



Guidelines for effective consultation with older people and disabled people

March 2008

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1 About Imtac

- 1.1 Imtac is a committee of disabled people and older people as well as others including key transport professionals. Our role is to advise Government and others in Northern Ireland on issues that affect the mobility of older people and disabled people.
- 1.2 Our aim is to ensure that older people and disabled people have the same opportunities as everyone else to travel when and where they want.
- 1.3 Imtac receives support from the Department for Regional Development.

2 Introduction

- 2.1 Government here has made high level commitments to make the transport system more accessible to disabled people and older people. The Regional Transportation Strategy promised to build in accessibility for disabled people and older people as a condition of public money being spent. The RTS also committed the DRD to develop an Accessible Transport Strategy to address the particular barriers to travel experienced by older people and disabled people. In order to deliver on these high level commitments it is essential that the DRD develop the best possible policies and services that address the barriers experienced by disabled people and older people. Imtac views consultation with disabled people and older people as the key driver in developing effective policy.
- 2.2 These guidelines have been developed by Imtac to assist the Department for Regional Development and others to engage with disabled people and older people through consultation. The guidelines are based on good practice and are designed to assist the DRD to meet Policy 4 of the Accessible Transport Strategy (ATS) which requires consultation with disabled people and older people at an early stage of policy development.

3 How these guidelines should be used

- 3.1 In line with the policies contained in the ATS these guidelines should be used during consultation particularly in regard to those policies and programmes that directly affect disabled people and older people. These policies include the Transport Programme for People with Disabilities, the Rural Transport Fund and the Concessionary Fares Scheme as well as the ATS itself. However they should also be applied generally to the development and review of other policies as many policies not focussed on disabled people and older people may never the less have major consequences for them.

4 The benefits of effective consultation

4.1 Effective consultation with disabled people and older people should be viewed as an essential part of policy development. Engaging with older people and disabled people can help policy makers:

- Understand barriers to travel and mobility experienced by older people and disabled people
- Assess the impact of new and current policies or services
- Develop better policies and services
- Identify potential new policies or services

4.2 In addition consultation helps Government agencies meet the following statutory duties and policy obligations

- Meeting DRD policy around consultation
- Meeting Government's statutory duties under Section 75 of the Northern Ireland Act
- Meeting Government's disability duties under the Disability Discrimination Act (DDA)

4.3 The Accessible Transport Strategy (ATS) clearly recognises the value of consultation in developing policies and services. Policy 4 of the ATS commits the DRD to:

“Consult with older people and people with disabilities and their representative organisations at an early stage in the development of new transport policies and projects and on the detailed implementation of access features incorporated in new transport infrastructure.”

- 4.4 This policy applies generally to all DRD policies and services but particularly to those that are specifically designed for older people and disabled people. The ATS clearly makes the link between good policy development and effective and early consultation with older people and disabled people.
- 4.5 Section 75 of the Northern Ireland Act 1998 requires all public authorities to have due regard to the promotion of equality of opportunity and regard to the need to promote good relations. Consultation has great value in assessing the impact of policies on older people and disabled people. It provides essential qualitative data which can be also be used to inform future policy decisions.
- 4.6 The new disability duties under the Disability Discrimination Order require all public bodies to:
- to promote positive attitudes towards disabled people, and
 - to encourage participation by disabled people in public life.
- 4.8 Effective and inclusive consultation with disabled people should be an integral part of any public bodies Disability Action Plan.

5 Guidelines for effective consultation

5.1 Imtac recommends that the following be applied to the development of all new policy and the review of existing policies and programmes:

- Written consultation, allowing a minimum of 12 weeks, must always take place during policy development or review
- Consultation must be clear about what the proposals are, who may be affected, what questions are being asked and the timescale for responses
- Written and other forms of consultation must be accessible to disabled people and older people
- Imtac recommends that additional methods of consultation also take place to supplement written consultation
- That these guidelines are applied to consultants undertaking work on behalf of the Department for Regional Development
- That participants in any consultation process are always informed of the outcome of the process – illustrating how consultation has influenced the policy

Written consultation

5.2 Imtac recommends that all new policy development and any review of existing policy be subject to formal written consultation. This written consultation can be targeted. Any written document must be designed to be accessible to the widest audience. Imtac has included in Appendix A a checklist developed by the Disabled Persons Transport Advisory Committee to assist the Department for Transport make consultation documents accessible. The Committee recommends that the DRD adopt this guidance as future standard practice.

- 5.3 Any written document must be made available in the full range of accessible formats including large print, audio, easy read and languages other than English, including BSL and ISL. These should be available from the first day of any consultation process. In cases where this cannot be achieved DRD must extend the deadline for responses to take account of any delay. Any consultation document should be clearly available on the appropriate section of the DRD website.
- 5.4 As well as making documents available in accessible formats the DRD must also develop mechanisms for people to respond in accessible ways to consultation. For example some blind people and other disabled people may need to ring in and record their responses. The option of responding in an accessible way must be clearly advertised on all consultation documents.
- 5.5 Imtac recommends that any consultation process allow a minimum of twelve weeks to allow maximum participation from stakeholders. It is particularly difficult to respond to consultations that take place during the Christmas holidays and during July. We recommend that both the period between Christmas and New Year and the peak summer holiday period be excluded from this twelve week period.
- 5.6 Imtac can provide advice to the Department on targeting older people and disabled people during consultation.

Additional methods of consultation

- 5.7 Imtac recommends that DRD undertake additional methods of consultation as well as written consultation. These activities should be viewed as supplementary to a written consultation and not a substitute for it. Imtac views the following as good examples to additional consultation methods:
- Pre-consultation
 - Consultation meetings
 - Using existing forums

- 5.8 In our experience the earlier stakeholders are involved in a process the more likely that the process will be inclusive and effective. If stakeholders are involved too late barriers may already have been built into a policy that will give rise to difficulties for disabled people and older people. Imtac strongly recommends that as a minimum DRD engage with Imtac at the earliest stage of any process to avoid potential difficulties.
- 5.9 Imtac can also provide advice at this stage on planning a consultation process and targeting information at disabled people and older people.
- 5.10 Imtac welcomes the growing trend by public bodies here to hold meetings with stakeholders during formal consultation processes. These meetings give consultees the opportunity to engage directly in a process. They can help identify issues for particular geographical areas. Finally they are a way that officials can meet in person people directly affected by policies. Whilst such meetings can be organised by the Department it is often useful to involve stakeholders in organising and convening such meetings, particularly with regard to reaching people who don't usually participate in consultation. Imtac has assisted DRD and others in this respect in the past (see the section on good practice examples) and would encourage that this practice be used more often.
- 5.11 Any consultation event undertaken by DRD must be accessible to all those attending. Imtac has included in Appendix B a checklist developed by the Disabled Persons Transport Advisory Committee to assist the Department for Transport make consultation meeting accessible. The Committee recommends that the DRD adopt this guidance as standard practice.
- 5.12 The Department should engage with any existing forums to supplement any written consultation. Obviously from the perspective of Imtac, the Committee strongly recommends that DRD utilise fully the resource, knowledge and expertise possessed by Imtac during any process.

Use of consultants

- 5.13 Imtac has noted that consultations are often undertaken on behalf of the Department by consultants. Often such processes do not meet the high standards we have outlined above.
- 5.14 Imtac recommends that DRD integrate inclusiveness and accessibility into the process of procurement for any work that involves consultation. Consultants should be required to show how they propose to address these issues and what skills and expertise they have in this area.

Keeping participants informed

- 5.15 A key aspect of any accessible and inclusive consultation process is going back to consultees and explaining what changes were made as a result of the consultation as well as what changes were not made. This helps consultees assess the value of contributing to consultation and better understand the policy making process.
- 5.16 Imtac recommends that the DRD adopt the practice of going back to consultees with feedback as standard procedure for all consultation.

6 Good practice examples

The Accessible Transport Strategy (ATS)

6.1 The ATS was developed by DRD during 2004-5. The Strategy seeks to identify and overcome the barriers that prevent access to the transport system for older people and disabled people. The consultation process included pre-consultation to identify issues and formal consultation on the draft ATS. The process was designed from the early stages to be inclusive and to encourage the participation of older people and disabled people. The Department received unprecedented praise for their approach to consultation and the resulting final ATS. The process remains a benchmark for future consultation.

6.2 Key aspects of the consultation included:

- Talking to groups at early stage about how to make the process inclusive
- The creation of a group of key stakeholders to advise throughout the process
- Use of key stakeholders to distribute the pre-consultation Issues Paper and the draft ATS
- Organisation of 13 public meetings across Northern Ireland to help identify issues
- Use of stakeholders to convene meetings
- Organisation of specific focus groups with deaf people and people with learning disabilities to help identify issues
- Organisation of 4 regional workshops with disabled people and older people to discuss the draft ATS
- The provision of clear information to participants at each stage of the consultation explaining processes and decisions

The Review of Taxi Regulation in Northern Ireland

6.3 The Department of the Environment (NI) has been reviewing the regulation of taxis in Northern Ireland for a number of years. The process has involved pre-consultation with stakeholders, consultation on proposed changes to regulation and consultation on legislation connected with the review. From an early stage the review team identified disabled people and older people as key

stakeholders and were pro-active in seeking their views at each stage of the process.

6.4 Key aspects of the process included:

- Talking to organisations of and for disabled people and older people at the early stage of the process
- Using Imtac to distribute information about proposed changes to regulation to disabled people and older people
- Working with Imtac to organise 2 public meetings in Belfast and Derry about proposals
- Working with Imtac to organise 2 focus group meetings in Dungannon and Belfast to discuss proposals
- The provision of clear information to participants at each stage of the consultation explaining processes and decisions

7 Conclusion

- 7.1 Imtac believes that effective consultation is vital to developing inclusive and accessible policies and services. Effective consultation will assist the DRD meet the commitments made in both the Regional Transportation Strategy and the Accessible Transport Strategy to develop an inclusive and accessible transport system. The Guidance set out in this paper sets out how the Department can “mainstream” accessibility for disabled people and older people during future consultation. Imtac recommends that the DRD adopt these guidelines and apply them to all new policy development as well as any review of existing policy.
- 7.2 Imtac believes that these Guidelines are also useful for Government in general in Northern Ireland.

Appendix 1

Checklist for documents

A consultation document should be as simple and concise as possible. It should include a summary, in two pages at most, of the main questions it seeks views on. It should make it as easy as possible for readers to respond, make contact or complain. The questions asked in consultation documents need particular attention. Any question should be clear and easy to understand. Where a format such as a questionnaire with spaces for specific responses is provided it should be made clear that responses in other formats will be taken into account.

Documents should be made widely available, with the fullest use of electronic means (though not to the exclusion of others), and effectively drawn to the attention of all interested groups and individuals. Making documents widely available may include doing so in alternative formats. These could include Braille versions, audiotapes, large print, easy-to-read versions with illustrations to benefit people with learning difficulties, and versions using Sign language. We recommend this is considered at an early stage in the development of the policy and budgeted for.

Where documents are published on the Internet they should be easily accessed and downloaded, with the option of a single file as well as a number of smaller files for each section. Many people with sight disabilities experience problems accessing 'pdf' files, especially where a document is in many parts. Some people with visual impairments relying on text-to-voice conversion software which may not be able to access these documents at all. We recommend a simple text or 'Word' version is also made available as a single download. We recommend officials ensure organisations of and for disabled people are contacted on a range of issues. In ensuring disabled people are aware of consultations we recommend contacting Imtac and umbrella organisations in the first instance.

Use a readable font. Arial or another clear sans serif font with a 14 point size is recommended. All paragraphs and pages should be numbered using Arabic numbering (e.g. 1, 2, 3).

Avoiding using acronyms. Explain any technical terms

Alternative formats – could include Braille versions, audiotapes, large print, clear print using special typefaces, easy-to-read versions with

illustrations to benefit people with learning difficulties, and versions using Sign language. We recommend this is considered at an early stage in the development of the policy and budgeted for. It may be possible to generate some of these formats such as large or modified print at short notice but you should have some copies available at all times in all formats in which they are likely to be needed.

Website materials - Where documents are published on the Internet they should be easily accessed and downloaded, with the option of a single file as well as a number of smaller files for each section. We recommend a simple text or 'Word' version is also available as a single download. Some text to sound software used by people with visual disabilities cannot read PDF documents.

Consultation list – include representative and any relevant local disability organisations, Do not assume that a national organisation is best placed to respond to a local consultation or will know who is.

Video is increasingly a medium used in consultation processes. Videos should include subtitles, and consideration be given to include British Sign Language. Where DVDs are used it may be possible to design in Sign language interpretation, audio-description and subtitles and soundtracks in a range of languages from the start.

Dealing with queries – be prepared to respond to queries about consultation in appropriate ways to the inquirer. Textphones such as minicom allow a deaf person to send a typed message through a telephone line, while Typetalk is a national relay service connecting a textphone and a hearing telephone user using a hearing operator who is in contact with other parties. Fax, e-mail and text messages are also popular methods of communication for deaf people.

Appendix 2

Checklist for accessible meetings

Assessment criteria for accessible venues:

- Reserved or Blue Badge parking near to entrance and reached by an accessible route
- Well signed entrance with clear accessible route from parking, pedestrian access points and public transport drop off points, including ramps and handholds in accordance with Part M building regulations.
- Due consideration needs to be given to the venue's distance and accessibility from public transport links (rail, air and low floor bus) to reduce the cost of providing taxis from the terminals to the venue, and indeed the availability of accessible taxis. To ensure full accessibility of the venues used you may have to audit how suitable the facilities would be.
- Dropped kerbs at entrances and level or ramped access
- Accessible road crossings near entrance which should include such features as beepers on signal posts, textured cones on controls that are easy to see and reach (and preferably with tactile/Braille controls and audible announcements) and textured route paving
- Guide dog run/toilet facilities
- No narrow doorways (minimum 800mm for a straight approach, more to allow for turning)
- Lifts available to all levels with low level controls
- Accessible and clearly signed toilet facilities for both sexes
- Accessible access to refreshment facilities (restaurants or café areas), telephones and vending machines
- Conference room space to cater for the expected number of people (including language service professionals such as Sign language interpreters, lipspeakers and palantypists) with enough circulation space for wheelchair and assistance dog users
- Tables with at least 750mm clearance for wheelchairs underneath, and chairs removed from some table spaces to allow room for wheelchairs.

- Clear accessible signs, in terms of height, contrast, print. *Inclusive Mobility*¹ offers advice on signage.
- Controllable lighting, including blinds, within the conference room area to assist Sign language interpreters and lip speakers
- Sound enhancement equipment either available on site or 'hired in' by the user.
- Announcements of evaluation procedures will need to take account of the needs of disabled people
- Ask people to introduce themselves in turn, so people with visual disabilities can be sure where people are in relation to themselves.
- Where interpretation is provided ask people to avoid acronyms and jargon and not to speak too fast, to enable interpretation to take place smoothly
- Make sure there are no obstacles at entrances and in corridors such as bins, and cables.

Sound enhancement equipment suppliers

The Mobility and Inclusion Unit in DRD has a portable induction loop system which can be used by anyone in the Department.#

In addition a number of companies can provide sound enhancement equipment and normally the services of a technician throughout the hire period. This can take the form of an induction loop for the room, portable inductors worn by individuals who need them or an amplification system with microphones.

Communication support

Palantypists are stenographers providing speech to text reporting during meetings using a typing machine and usually a laptop screen, though text can be projected onto larger screens for larger numbers of people.

The palantypists bring their own equipment to meetings but will need to have a power supply available for their equipment. It is always useful to have an additional extension lead available. All leads need to be taped to the floor for safety.

¹ <http://www.dft.gov.uk/transportforyou/access/tipws/inclusivemobility>

Palantypists are in demand and it is advisable to book their services as soon as a meeting date is known. If not available, an alternative provision might be to engage Sign language interpretation, finger spelling, Sign Supported English or lip speakers but you would need to ask members individually if these alternatives would be suitable (it would depend on the type and size of meetings).

Interpreters will translate speech into Sign language and vice versa. They need papers in advance of the meeting. Two interpreters will need to be available at each meeting as interpreters need regular breaks.

There may well be a charge of the full cost of provision for palantypist and interpreter cancellations of less than one working week before the booking date.

Water should be made available for assistance dogs, and arrangements for their exercise and relief over the course of a long meeting.

Meeting Papers

The general principles relating to consultation documents set out below should be followed.

The meeting papers should be produced in a sans-serif font such as Arial with a 14 point font size. The papers should be ideally bound to enable ease of use. All paragraphs and pages should be numbered. Where papers are handed out at meetings, and expected to be used, this is impossible for people who need alternative formats such as tape

Nameplates should be used in the largest font size possible.

Imtac Members 2007\8

Frank Caddy	Chair
William Stewart	Vice-Chair
Michelle Bagnall	
Elizabeth Black	
Terry Butler	
Ann Collins	Convenor Personal Mobility Group
Sinclair Duncan	
Barbara Fleming	
Anita Gracey	
Tom Hoey	Convenor Public Transport Group
Karen Magill	
Henry Mayne	
Norma Moore	
Joe McCusker	
David McDonald	Convenor Information & Training Group
Geraldine Mulhern	
Andrew Murdock	
Bryan Myles	
Ronnie Patterson	
Alan Sheeran	

More information on our members is available on our website, visit www.imtac.org.uk.

Observers

Olaf Hvattum	Age Sector Reference Group
Kevin Doherty	Disability Action
Tony O'Reilly	Equality Commission for Northern Ireland
Alan Preston	Mobility and Inclusion Unit (DRD)
Janet Watson	Mobility and Inclusion Unit (DRD)
Eddie Lynch	General Consumer Council