



Comments from Imtac on the Accessible Transport Strategy draft Action Plan 2009-2012

June 2009

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About Imtac

- 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.
- 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.
- 3 Imtac receives support from the Department for Regional Development.

General comments

- 4 Imtac welcomes the opportunity to comment on the draft Action Plan 2009-2012 for the Accessible Transport Strategy (ATS). The Committee would like to commend the Department for the inclusive approach it has taken to the consultation around the draft Action Plan. We believe this approach represents good practice and should be used on a more consistent basis by both DRD and other Government Departments. The process also meets policy 4 of the ATS.
- 5 Imtac has supported and welcomed the significant investment made by Government here in transport services. Investment in buses, trains and infrastructure means public transport here is physically more accessible than in many other parts of these islands. In addition Government has invested in other services such as door2door, rural transport and concessionary fares. The ATS recognises that investment alone is not enough. The Strategy recognises that all the barriers that make using transport difficult must be addressed in order to maximise the impact of investment for disabled people and older people. It sets out a framework to achieve

this through implementation of policies many of which do not require resources only a change custom or practice.

- 6 The DRD rightly received widespread acclaim when the ATS was published in 2005. The framework set by the Strategy coupled with investment means that Northern Ireland has the opportunity to lead the way in designing a transport system accessible to older people and disabled people. Imtac is inextricably linked to the ATS. The Strategy clarified and strengthened our role as well as setting out a framework for our work. The ATS made clear the Committee has a key role in assisting stakeholders (including the DRD) in its implementation. Imtac is therefore uniquely placed to comment on progress around the delivery of the ATS.
- 7 It is clear to Imtac that some progress has been made around implementing the policies of the ATS. However it is equally clear that some policies have not been implemented during the development of other policies and services. In our response we indicated those areas where we feel the ATS is working and those areas where we feel it is not.
- 8 In order for investment in services to be deemed successful disabled people and older people must experience an improvement in travel choice and mobility. Imtac has talked to many disabled people and older people and their organisations and the consensus of all these discussions has been that whilst many things have improved people still experience unacceptable difficulties accessing transport. The Committee believes this feedback reflects the fact that investment here has not been maximised. It is the key recommendation of our response that rather than look at renewing the Action Plan for the next three years the Department needs a more fundamental look at how the Strategy can be implemented more holistically in the future.

Comments on the achievements 2007-2009

- 9 The draft Action Plan sets out on page 10 a number of key achievements of the ATS over the past two years. Many of these achievements are not directly attributable to the Strategy. Actions such as investment in buses arise from wider strategic priorities set by the Regional Transportation Strategy. Improvements are also driven by legislation, particularly the Disability Discrimination Act, which sets minimum accessibility requirements for buses, coaches and trains. These regulations mean that services will improve regardless of the ATS. The list of achievements focuses largely around investment in services not the implementation of policies. Chapter 3 of the consultation sets out the achievements of the 2007-2009 Action Plan. However, Intac questions how many of these have been fully achieved.
- 10 For example, the “achievement” around the start of the process to introduce legislation to extend Part III of the DDA to transport services here. This legislation was introduced in Great Britain in December 2006. As Policy 1 of the ATS commits Government here to introducing legislative changes in parallel to elsewhere in the UK, clearly a three year delay cannot be viewed as an achievement. In fact, the process only started here because disabled people lobbied MLA’s and the OFMDFM Committee in particular.

Where the ATS is working

- 11 There have been many achievements directly relating to the ATS. Some of these achievements have not received recognition in the draft Action Plan. The following are examples;
1. Roads Service has ensured that during the implementation of decriminalised parking enforcement that tackling abuse of accessible parking bays was a priority. Recently enforcement

has been extended to tackle misuse of the Blue Badge by non-disabled people. Roads Service is also working with Translink to look at ways of tackling illegal parking on bus stops. This approach is a clear example of ensuring that changes in policy deliver maximum benefits to disabled people and older people. The pro-active approach shown by the Parking Enforcement Team is reflected by Roads Service in general.

2. Last year the Assembly passed a Taxis Act giving the Department of the Environment powers to better regulate taxis here. These powers include measures that will improve access for disabled people and older people to taxis. The Taxis Act followed an extensive review of taxi regulation here which involved extensive engagement with disabled people and older people. This process is a superb example of Government implementing the policies of the ATS with regard to consultation and effective policy development.
3. Translink has received substantial public funding over the past decade. Despite the improving physical access to transport the transition to a more accessible public transport system has been difficult due to other barriers that make transport inaccessible. To its great credit Translink has responded positively to these challenges. Changes made to make services accessible include:
 - Making information about services more accessible and using positive images of disabled people and older people in materials
 - Replacing all faulty automatic ramps on buses with manual ramps
 - Improving signage on buses including priority seating signage

- Developing policies around minimum service standards for older people and disabled people
- Designing a unique and innovative accessible bus for use in rural areas
- Making provision for all 4000 staff to receive disability equality/ awareness training
- Consulting with disabled people and older people on the design of all of the above

12 These are examples that highlight how the ATS can and is working. The examples also clearly highlight that the Strategy is not about investment in services - it is about maximising investment by ensuring all the barriers that prevent disabled people and older people accessing transport are removed. Issues such as information, training and developing positive policies are as important as having vehicles people can get on and off easily. Perhaps the most important aspect of each these examples is the involvement of disabled people and older people in the development of policy and services.

13 Many of these issues have been raised by Imtac with the stakeholders concerned. Since the publication of the ATS Imtac members have worked hard to ensure the Committee meets the objectives set by the Strategy. Part of this work has been to develop positive partnerships with all the Government agencies, transport providers, other statutory agencies and most importantly disabled people, older people and their organisations. As well as the aforementioned examples Imtac has also worked effectively with OFMDFM, the community transport sector, the General Consumer Council, the Equality Commission, local airports as well as numerous organisations of older people and disabled people to ensure that legislation, policy and services are developed to maximise the benefit to older people and disabled people.

Where the ATS is not working

- 14 Despite the positive developments to date there are areas where we believe the ATS is not working, or could be improved. This section highlights some of these areas using examples where appropriate.
- 15 Many of the policies in the ATS aim to “mainstream” key issues to ensure that investment in services is maximised. These policies seek to address the everyday barriers that may prevent disabled people and older people accessing transport such as vehicle accessibility, access to information and the attitudes of staff involved in providing services. The implementation of these mainstreaming policies should mean that these barriers are not built into any services developed by or supported by DRD here.
- 16 It has become apparent to Imtac that many of these policies are not being applied consistently, particularly with regard to the design of important services. Policy 11 for instance requires the Department to promote the use of accessible vehicles on alternative services. Imtac has questioned whether the Department is meeting this policy through the delivery of door2door transport using taxis. This decision was taken against the advice of the Committee and ignores research conducted into the limitations of taxis¹. Imtac has received reports from disabled people who are members of door2door who cannot access these vehicles or can only access them with great difficulty. More recently the Department created a Travel Voucher Scheme to be used by large groups in rural areas. Whilst vehicle accessibility was mentioned in the criteria for operators it was not a requirement. As a result few if any of the operators currently involved in the

¹ For example European Conference of Ministers of Transport Report “Access to Taxis” 2007

scheme provide vehicles that are accessible. This will mean that many disabled people and older people cannot use a publicly funded service aimed at specifically improving their mobility. The same Scheme also does not require any of the operators to train staff around disability equality or awareness. This is counter to Policy 6 of the ATS.

- 17 Information is another area where policies are not always applied consistently. For example policy 28 of the ATS requires all information about services funded by Government here to be made available in formats “appropriate to the needs of older people and people with disabilities. Imtac has worked hard with Translink and the community transport sector to improve the accessibility of information about these services. However other providers including the DRD do not always meet these standards. For example the Committee recently learned that application packs for the range of concessionary smartpasses are not available in alternative formats. Given that people eligible for the smartpasses are among those most likely to need other formats (blind people for instance) this is disappointing and is an example of the Department not meeting their own policy requirements.
- 18 Another key function of the ATS is to set out a policy framework to manage the transition to an accessible transport network. Policies seek to maximise the investment in new buses, trains and coaches whilst ensuring alternative services are there for people who require them both in the interim and the longer term. Policy 13 of the ATS makes clear that it is Departmental policy to maximise the use of public bus and rail services to reduce the need for alternative services. Policies 24 and 25 make clear the importance of raising awareness of all accessible travel opportunities available to disabled people and older people. Imtac believes that since 2005 there has been scope for the Department to manage this transition more effectively. In particular Imtac is concerned that the focus from DRD

has almost entirely focused on promoting alternative services and has neglected the benefits of promoting the benefits of the rapidly improving accessibility of public buses and trains.

- 19 By way of illustration Imtac would like to highlight the development of door2door transport. Door2door is a vital service that ensures that those disabled people and older people who cannot access mainstream public transport have an alternative. The Department has invested heavily in promoting door2door including television advertising. Similar promotion of accessible public transport services has not taken place. Promotion of door2door has been successful with some 9000 people having joined the scheme to date. However Imtac is aware that operators have only around 40 vehicles to deliver this service. As a Committee we are increasingly receiving feedback from people who find the service difficult or impossible to access. There are growing concerns among members that perhaps the Department has created the demand for a service that operators will never be able to meet.

- 20 Another area that highlights imbalance in implementing the ATS policies around the transition to an accessible transport network is the current support for a Travel Buddy Scheme by DRD. Policy 25 of the ATS recognises that disabled people and older people will require additional support to address concerns about using new transport services. Travel training has been used elsewhere, and by some organisations here, to support disabled people and older people to use conventional public transport independently. The Buddy Scheme here initially started as a pilot working with older people to encourage use of bus services. At the direction of DRD the focus of this pilot was changed to encourage people to use door2door services in certain areas. Imtac does not see the rationale for supporting a scheme with such a narrow focus and the Committee does not believe this scheme fits within the framework set by the ATS.

- 21 Investment in alternative services such as door2door has been a good thing but Imtac is concerned that the imbalance in the promotion of these services as opposed to better bus and rail services is placing an unrealistic demand on services and is not maximising the investment made in these other services. By way of illustration nearly 90% of Metro bus services currently meet accessibility standards as do all town bus services in places outside Belfast. Further investment may mean we have a fully accessible bus network by 2012. New trains on order will mean the entire network here will meet accessibility standards by 2012. This means that the public transport network is and will be more accessible than many other parts of these islands. Yet collectively little has been done to promote this. Imtac believes that many of the 9000 members of door2door could be benefitting from these improved services freeing up this vital service for those who do not have this choice.
- 22 To further emphasise this point Imtac would like to highlight the difficulties experienced by the Committee and others in seeking support from the Department for initiatives that would enhance access to mainstream public transport. Perhaps the most relevant example is the delays and endless difficulties experienced around developing a pilot of audio visual information systems on buses here.
- 23 Other areas and local authorities do provide better examples of utilising resources to maximise the benefits of investment in public transport services. In London for example the bus network is 100% accessible. Transport for London has recently changed its approach to Dial-a-ride services for disabled people with a view to the service acting as a stepping stone for many dial-a-ride users to use mainstream buses. This approach is complemented by travel training schemes. This approach should mean that Dial-a-ride services are more available to disabled people who cannot access conventional bus services.

- 24 Working with disabled people and older people is at the heart of implementing the ATS. Section 5.3 of the ATS sets this in context highlighting the key role Imtac has to play in the process. Policies 3 and 4 of the strategy set out the framework for future engagement with disabled people and older people. Policy 3 seeks to clarify the role and importance of Imtac as the main source of advice to the Department and others. Policy 4 is a commitment to consult with older people and disabled people generally around policy and service developments. As perhaps is illustrated by previous comments in this section there remains a gap between these policies and what happens in practice. There have been good examples of where Government here has engaged effectively with both the Committee and others (as highlighted in the previous section). However Imtac and others are too often not consulted around key policy and service developments. As a result Imtac often has to raise issues with the Department after services have been introduced. This approach is far from ideal as it makes positive change more difficult to achieve and does not help relations between the Committee and the Department.
- 25 By way of example one of the areas where this has been a problem is the Concessionary Fares Scheme. A positive outcome of the ATS in 2005 was an action to review the Scheme here with a view to improving access to its benefits. There are many issues with the Scheme, some relating to concessions available but others relating to the administration of the Scheme including the requirement to buy single tickets for each part of a journey. The Department took the decision not to engage directly with disabled people and older people during the review (counter to policy 4 of the ATS) and published a report looking at the concessions but not the administration of the Scheme in January 2007. Imtac and others continued to press the Department to look at removing the administrative barriers that make using the scheme difficult for disabled people and older people. Eventually the Department agreed to change the requirement to buy

single tickets and return journeys became permissible in April 2009. However it has now become apparent that the return journey concession only applies to half-fare smartpass holders and can only be used on rail journeys. Many older people and others such as Blind Smartpass holders would benefit equally from the change but for some reason have been overlooked by the Department. Imtac is again in the position of asking the Department to look at this issue again with a view to making further changes.

- 26 The above example is an illustration of the sometimes difficult process involved in achieving modest positive change for disabled people and older people. This clearly is not what was envisaged as positive engagement by the ATS when published in 2005.
- 27 The final area of concern Imtac would like to raise is the function and performance of the Mobility and Inclusion Unit. MIU was established by the ATS to “champion” the Strategy within the Department, assisting the various divisions to mainstream policies in their work. It has been apparent to Imtac that for some time MIU has not been effective in fulfilling this role. There are clearly reasons for this including staff turnover, knowledge, expertise, resources and the priority given to other projects. As highlighted paragraph 13 of this response Imtac is itself working hard to champion the ATS to stakeholders. However in the long term we need the Department to provide both commitment and resources to implement the strategy through a dedicated unit envisaged in section 7.2 of the ATS. Without an effective body to drive the Strategy it is clear that many of the problems the Committee has highlighted will continue to happen.

The way forward

- 28 In responding to the current consultation Imtac has avoided detailed comments on the draft Action Plan. Imtac responded in detail to the last Action Plan consultation at the end of 2007. It is perhaps

indicative of the difficulties being raised that many of the issues we raised then are still relevant. The Committees comments to the current consultation are deliberately more strategic. Our position is based on the experiences of Committee members and the overwhelming feedback we have received from disabled people and older people who tell us the undoubted substantial investment in transport is not meeting expectations. As a Committee we believe that before we commit to a further three year action plan we must all first address fundamental issues around the implementation of the Strategy and the failure to maximise investment.

- 29 A second factor that is influencing our comments is the financial situation that will face Government here for years to come. It is clear that resources in the future will be extremely scarce. It is imperative in this climate that we are smart about how we spend money in future. It is clear to the Committee that future investment must be targeted to better deliver maximum benefit to older people and disabled people and that the policies of the ATS provides the perfect framework to do this. As a society we simply cannot afford not to implement the ATS.
- 30 Imtac believes whilst progress has been made over the past four years there are significant areas where implementation of the ATS needs to be improved. The Committee therefore recommends that before entering another action plan the Department should undertake a detailed review of how well the Strategy is being implemented. In particular we would like the Department to take a fresh look at
- how the mainstreaming policies of the ATS can be better incorporated in key programmes,
 - how the DRD can implement policies around managing the transition to an accessible transport system and

- how the Department can engage more effectively with disabled people and older people.

A review should also look at the mechanisms for implementing the ATS and in particular the performance and functions of MIU. The opportunity should also be taken to review how well other aspects of the ATS are working including the role, functions and performance of Imtac. Section 7.4 of the ATS makes provision for review of the Strategy in addition to renewal of the Action Plan. Given the ongoing reviews and likely refocusing of both Regional Development Strategy and Regional Transportation Strategy a more detailed look at the ATS appears sensible.

Conclusion

31 Imtac thanks the DRD for the opportunity to respond to the consultation. The Committee acknowledges the progress that has been made to date through implementation of the ATS and substantial investment in services. Despite this progress and as an effective advisory body we cannot ignore key areas where we can see the Strategy is not being implemented. We also cannot ignore the growing number of disabled people, older people and their organisations who are telling us things are not improving for them.

We believe it is in the interests of all stakeholders (Government, transport providers and disabled people and older people) for a review of the ATS to take place.

Contact us

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