



**Comments from Imtac about the public
consultation on Taxi Fare Increase**

(October 2022)

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Making our information accessible

As an organisation of and for disabled people and older people Imtac recognises that the way information is provided can be a barrier to accessing services and participation in public life. We are committed to providing information about our work in formats that best suit the needs of individuals.

All our documents are available in hard copy in 14pt type size as standard. We also provide word and pdf versions of our documents on our website – www.imtac.org.uk. In addition we will provide information in a range of other formats including:

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About Imtac

The Inclusive Mobility and Transport Advisory Committee (Imtac) is a committee of disabled people and older people as well as others including carers and key transport professionals. Its role is to advise Government and others in Northern Ireland on issues that affect the mobility of Deaf people, disabled people and older people.

The aim of Imtac is to ensure that Deaf people, disabled people and older people have the same opportunities as everyone else to travel when and where they want.

Imtac receives support from the Department for Infrastructure (herein after referred to as the Department).

Background to our comments

Imtac notes that this is the second time in under a year that the Committee has been asked to comment on proposals to increase taxi fares. As with our comments made in October 2021¹ it is important to set out how the wider context informs our response to the current proposals.

Research² by the Joseph Rowntree Foundation which has highlighted that pre-pandemic nearly half of people living in poverty in the UK were either a Deaf or disabled person or someone who lives with a disabled person. There is growing evidence Deaf people, disabled people and older people are amongst those most impacted by the COVID-19 pandemic and the current cost of living crisis.

Research both from here and GB indicate that Deaf people and disabled people rely more on taxis to undertake everyday journeys than other sections of society. A Consumer Council report³ from 2017 indicates that disabled people are three times more likely to rely on taxis than non-disabled people. Statistics⁴ from England indicate disabled people make 55% more journeys using taxis compared to non-disabled people. Any increase in fares is likely to disproportionately impact Deaf people, disabled people and older people.

¹ <https://www.imtac.org.uk/publications/comments-imtac-about-targeted-consultation-proposed-taxi-fares-increase>

² <https://www.jrf.org.uk/report/uk-poverty-2019-20>

³ https://www.consumercouncil.org.uk/sites/default/files/original/Taxi_Research_Report_FINAL.pdf

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https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/972438/transport-disability-and-accessibility-statistics-england-2019-to-2020.pdf

Even before the COVID pandemic there was significant anecdotal evidence that access to taxi services for Deaf people, disabled people and older people living in Northern Ireland had worsened since changes to Regulation in 2016. The feedback Imtac has received since the removal of pandemic restrictions indicates that these barriers to access have worsened. Working with Imtac, the Department undertook a survey of Deaf, disabled and older peoples' experiences of using taxis in 2018. Despite a substantial response the findings of this survey have never been published. **As part of the broader recommendations associated with this response, we are requesting the Department publish the results of this survey without further delay.**

Comments on the proposals for Fare Increases

Whilst Imtac recognises the challenges created for taxi drivers and operators by the pandemic and cost of living crisis, the Committee has an overriding duty to represent the best interests of all Deaf people, disabled people and older people in the advice we give to Government.

Based on this duty we oppose a proposal that increases the cost of travel during a cost-of-living crisis whilst nothing is done to seek to mitigate its impact on Deaf people, disabled people, older people and other people on low incomes who we know rely disproportionately on taxi services.

Furthermore, Deaf people, disabled people and older people continue to face unacceptable barriers to accessing taxi services which we believe have worsened since the changes to regulation introduced in 2016. Imtac has heard about these recent examples of unacceptable practices from taxi drivers and operators:

- A wheelchair user visiting Belfast refused access by every rank taxi approached in Belfast City Centre
- A wheelchair user quoted £100 for 7 mile round taxi trip
- Refusal by a taxi driver to carry a passenger with a guide dog

Wider feedback indicates that both wheelchair accessible and standard taxi availability has reduced. Feedback from our members from areas such as Fermanagh and Tyrone suggest that taxi shortages are particularly acute in rural areas. There is no evidence from the

consultation that the fare rises proposed in the consultation will address any of these wider issues faced by Deaf people, disabled people, older people and other users of taxis.

Imtac recognises the need to periodically review and adjust taxi fares, but this should be part of a review of wider regulatory issues that balances the priorities of operators and drivers with those of passengers. The Committee believes that all the available evidence indicates that the current regulation of taxis in Northern Ireland is not working for Deaf people, disabled people, and older people. **In responding the current consultation our sole recommendation is that the Department initiate an immediate wider review of taxis in Northern Ireland which will consider fare increases as part of addressing wider issues with taxi services.**
Our proposals for change

The Committee is currently finalising a policy paper on the changes it believes are required to ensure Deaf people, disabled people and older people can access taxi services on an equal basis to others. A summary of key priorities highlighted in the paper includes:

1 Strengthening Regulation

We believe changes need to be made to strengthen regulation to ensure operators and drivers are required to make their services more accessible. Examples of changes include:

- Using existing powers under the Taxis Act to link the provision of WAVs to Operator Licensing
- Using existing powers under the Disability Discrimination Act to introduce a new legal duty to require taxi drivers to carry wheelchair users, broadly similar to existing legal duties for assistance dog owners / users

2 Providing financial incentives to taxi operators

We believe that the Department needs to do more to provide financial incentives to encourage operators to make services more accessible.

3 Involving taxis in transport policy and public transport services

We believe that taxis should be a part of the development of transport policy and services. We believe this will provide financial support to the taxi trade in return for improvements to the accessibility of services.

4 Improving Government contracting

We believe all Government Departments in Northern Ireland can play a lead role in improving the accessibility of services by requiring clear and inclusive standards when contracting services.

5 Mitigation for increasing fares

We believe that Government must look at mitigation measures that reduce the impact of increasing fares on groups in society (such as disabled people and older people) who rely on taxi services for day-to-day activities.

Conclusion

Imtac acknowledges the challenges faced by the taxi trade in the current cost of living crisis. We cannot, however, support proposed increases in fares which we know will exacerbate existing barriers and inequalities experienced by Deaf people, disabled people and older people when accessing taxis. Proposals that result in further limiting travel options for Deaf people, disabled people and older people also reinforce existing unequal access to employment, education, health and well-being, social activities, community and public life. Finally, the proposal to increase fares without mitigation is inconsistent with wider Government statutory equality duties and policy commitments. The Committee recommends that fare increases should only be considered as part of wider urgent review of taxi regulation.