



**Comments from Imtac about Budget 2023-24
Equality Impact Assessment Public
Consultation**

(June 2023)

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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).

Introduction

The Committee recognises the unprecedented challenges faced across Government Departments created by the budget settlement for 2023-24. We acknowledge the budget involves very difficult or impossible choices for officials. Given the scale of the proposed reductions in day-to-day spending there will inevitably be negative consequences for all of society and particular impacts for people from the Section 75 groupings. Imtac, therefore, welcomes the decision to publish an Equality Impact Assessment consultation on the impact of the current budget. We fervently hope that the responses to the consultation will highlight what will be the catastrophic consequences of proceeding with the proposed spending reductions and will prompt a rethink of the situation.

We note the statement in paragraph 4.13 of the consultation document highlighting that decision making on some of options for reducing spending fall outside the existing powers of the Permanent Secretary. Imtac's position is clear, we strongly believe that important, potentially life changing, decisions about key services and policies should not be taken by officials. Decisions on these matters are the responsibility of elected representatives.

The work of Imtac

Given the scale of the current challenges we understand that the value of the work of Imtac will be assessed alongside all organisations that fall under the discretionary spending remit of the Department. The Committee is proud of its role in providing one of the few opportunities

for Deaf people, disabled people and older people to be directly involved in development of policies and services. Since our formation in 2006 we have worked to develop strong partnerships within the Department for Infrastructure, across other Government Departments, local councils, Translink and transport providers and, importantly, with grassroots organisations of Deaf people, disabled people and older people.

We stand over a track record of working with others to deliver real change which improves the lives of Deaf people, disabled people and older people. Examples of our achievements include:

- Helping to deliver the first Accessible Transport Strategy in the UK
- Helping to deliver key Executive projects including Belfast Rapid Transit – Glider
- Helping to deliver other key projects including the roll out of audio-visual information on Metro buses
- Ensuring public transport is more accessible through influencing the design of buses, trains and infrastructure
- Ensuring all future stations include Changing Places Toilets
- Ensuring inclusive and accessible place making through input into land use planning policy and public realm schemes
- Strengthening legislation to ensure disabled people have more rights when using transport services
- Influencing key policy areas including taxi regulation, concessionary travel, active travel and pavement and wider parking enforcement

From the perspective of the Department and wider Government, Imtac provides an essential opportunity to involve Deaf people, disabled people and older people in the development of policy and services therefore complying with both existing statutory equality duties and obligations set out in the UN Convention on the Rights of People with Disabilities. Most importantly the work of the Committee assists the Department (and wider Government) to get policies, projects and services right from the start, rather than having to go through the expense and inconvenience of revisiting and retrofitting. We believe the Department receives exceptional value for the small annual budget Imtac receives. Reducing our budget will make little or no difference to the current financial situation but have a big impact on our work and the benefit it delivers for society. Removing our budget altogether will cause significant damage to the progress made in making our travel, our streets and places accessible and inclusive to everyone.

One final issue needs to be considered in relation to the continued funding of Imtac. Imtac is one of three similar advisory bodies of disabled people, with DPTAC and MACS advising the UK Government and the Scottish Government respectively. Based on the principle of parity, disabled people (and older people) in Northern Ireland will be disadvantaged compared to their counterparts in Great Britain if funding here is removed.

Comments on the EQIA

(1) Consideration of data and research / Assessment of impact

The evidence for the assessment of impact on Section 75 groupings in the EQIA is largely based on quantitative data held by the Department. The use of such data is helpful in identifying who currently uses services and the groups in society that will most likely be impacted if services are removed or reduced. Clearly analysis of this quantitative data has identified disabled people and older people as potentially hardest hit by the proposed spending reductions.

The EQIA does not however take account of a wealth of available wider research which establishes the linkage between transport, travel, inequality and social exclusion in society. The use of this research would allow the EQIA to highlight the specific impacts reductions in services will have across the range of Section 75 groupings.

The seminal research on the linkage between transport and social exclusion was *Making the Connections: Final Report on Transport and Social Exclusion*¹ published by the UK Government in 2003. There have been numerous subsequent research papers published on the topic since the publication of *Making the Connections* including a series of reports commissioned by the Department for Transport in 2019².

The research has established the connection between a transport and travel policy based around car dependency and the inequality this has created for people with little or no access to the car. In summary we

¹ See https://www.ilo.org/wcmsp5/groups/public/---ed_emp/---emp_policy/---invest/documents/publication/wcms_asist_8210.pdf

² See for example <https://www.gov.uk/government/publications/access-to-transport-and-life-opportunities>

have created a society where travel is essential but also a society that has created barriers to travel for many people. These barriers include:

- A lack of availability of transport
- A lack of accessible transport
- The high cost of transport
- Inaccessibility of wider infrastructure and the inaccessible location of key services and activities
- Limiting factors such as much longer journey times and multiple connections for people not travelling by car

We know from the research that certain groups in society are impacted more than others by transport related social exclusion including:

- Disabled people
- Older people
- Younger people
- Women
- People from minority and ethnic communities
- People on low incomes

The research also demonstrates that social exclusion due to transport can be exacerbated for people living in rural areas compared to those living in urban areas.

Research also tells us how poor access to transport impacts on people's lives and life opportunities including:

- Limiting access to employment
- Limiting access to education and learning
- Limiting access to key services including healthcare
- Limiting access to social, cultural and leisure activities
- Limiting access to cheaper food provided by larger supermarkets

Two other impacts arising from research are relevant to the current consultation.

Firstly, there is strong evidence that traffic impacts most heavily on the poorest communities. This means, for example, that statistically a child is much more likely to be killed or seriously injured as a pedestrian in a road traffic accident if they live in the most deprived 10% of wards.

Secondly, there is a cumulative impact on the individuals and communities arising from social exclusion, connected with transport. For individuals it means isolation, loneliness, and the associated impact on their mental health. For communities it means a lack of investment in local facilities, high unemployment, low educational achievement, poor health outcomes, higher levels crime and anti-social behaviour.

(2) Comments on the proposals outlined in the EQIA

Imtac recommends that the Department includes the consideration of existing and accepted research into the linkage between transport, travel, inequality, and social exclusion in its assessment of the equality impacts of the Budget 2023 / 24. The Committee believes such an approach will give a more realistic assessment of the impacts of the proposals contained in the consultation. We propose to highlight these impacts in the subsequent paragraphs.

Before addressing proposals to address the funding gap, it is necessary to highlight the negative impacts of some of the decisions already taken by the Department. The Committee is keenly aware that any measures that increase the cost of travel and transport are likely to impact most greatly on those in society who have the lowest incomes especially during a wider cost of living crisis. In particular, the rise in public transport fares and Rathlin Ferry fares already make travel more difficult for people on low incomes who don't have access to a car. Research such as Making the Connections shows this will disproportionately impact younger people, women, people with dependents, people from minority and ethnic communities and some disabled people. Imtac does acknowledge that the concessions currently offered by the Concessionary Fares Scheme provide some mitigation to older people and some disabled people from rising fares.

Imtac has greater concerns about the proposals to address the remaining funding gap. A reduction in public transport provision and removal of community transport and Shopmobility services will have a

catastrophic impact on people with limited or no access to a car. Research such as Making the Connections demonstrates the removal and reduction in these services is likely to impact most on disabled people, older people, younger people, people with dependents, women and people from minority and ethnic communities with the impact of service reductions felt most in rural areas and smaller towns, potentially isolating individuals and whole communities.

We are also extremely concerned about proposed reductions to Road Safety activities and roads maintenance, the potential switching-off of street lighting and the cessation of the gritting service. The previously highlighted research indicates that more deprived communities are disproportionately impacted by traffic, so while the proposals are likely to exacerbate existing road safety problems and ultimately lead to more people being killed and seriously injured using our roads, this is likely to impact more severely on deprived communities. A lack of maintenance, street lighting and gritting is likely to impact most on people walking, wheeling, or cycling, making such journeys feel more difficult (in some cases impossible) and make people feel less safe. Research³ demonstrates a lack of roads maintenance and street lighting is likely to lead to more slips and falls (and associated rises in compensation payments) and is likely to impact most on disabled people, older people, younger people, people with dependents, women and people from minority and ethnic communities for whom such journeys are a necessity not a choice.

Whilst these are the broad impacts of the proposals in the consultation, it is the real-world detrimental, cumulative consequences of the reductions on society that need to be acknowledged by decision makers. Removing and reducing services to such an extent will mean:

- A reduction in or loss of opportunities for employment for those impacted – Northern Ireland already has the highest employment gap between disabled people and non-disabled people in UK⁴ and the budget measures will inevitably increase this gap.
- A reduction in or loss of opportunities to take part in primary, secondary, further and higher education and lifelong learning – Northern Ireland already has the highest levels of educational

³ See for example the following report from Living Streets

<https://www.livingstreets.org.uk/media/8128/pedestrian-slips-trips-and-falls.pdf>

⁴ <https://www.gov.uk/government/statistics/the-employment-of-disabled-people-2022/employment-of-disabled-people-2022>

disparity between disabled people and non-disabled people anywhere in the UK⁵. The budget proposal will contribute to a worsening of an already dire situation.

- A reduction in access to key services including health and social care – Northern Ireland already has acute difficulties with health and social care services. The budget will make access to these services more difficult for many ultimately increasing the pressures in the system.
- A reduction in or loss of participation in social, cultural and leisure activities for many impacted – This is likely to contribute to increased isolation, loneliness and mental health issues, increasing the burden and costs for other public services.
- Increased travel and other costs (including food) for people impacted – The proposals will undoubtedly increase costs for people mainly currently living on lower-than-average incomes, increasing existing income inequalities during a cost of living crisis.
- A much less safe roads network leading to greater levels of deaths and serious injuries as well as increased trips and falls, deterring many people from making essential journeys walking, wheeling and cycling.

Three further broad and cumulative impacts of the proposals need to be acknowledged.

Firstly, transport and travel are essential to enable everyone to participate in society. These proposals impact on people who currently experience the most difficulties travelling and impact least on people who have easy access to a car. If implemented, the proposals will undoubtedly significantly increase the pre-existing inequalities in society and undo progress in policy and service development that has taken decades to establish. Savings in the short term are being made at the expense of the longer term goal of a fairer more equal society. Further consideration needs to be given to mitigating the impacts on those who face the greatest barriers to travel and transport through placing more of

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<https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/disability/bulletins/disabilityandeducationuk/2019#highest-qualification-by-disability-status>

the burden of any savings on those in society who experience the wider opportunities and travel choice afforded by the car.

Secondly, travel and transport have a cross cutting impact across everything Government does. The consequences of the proposals will inevitably increase the pressures on other services provided by Government and ultimately lead to increase costs to provide healthcare, education, training and employment services. From this perspective the savings achieved are the definition of a false economy.

Thirdly, Government in Northern Ireland has set ambitious targets around meeting the existential challenge of climate change. Key to this approach is reducing societies dependency on the car through reducing the need to travel and promoting and providing more sustainable travel options including better public transport and priority for walking, wheeling, and cycling. As well as increasing existing inequalities in society, the proposals will inevitably lead to increased car dependency making achieving our climate change goals impossible. To be clear Imtac recognises that failure to adequately address the issue of climate change will have catastrophic environmental and social impacts on Northern Ireland society and once again significantly increase future costs for Government here.

Conclusion

In our concluding comments on the consultation Imtac would simply restate its position. If implemented, all available evidence demonstrates the proposals, while affecting everyone, will have catastrophic and significant impacts across all the Section 75 groups. The proposals impact most heavily on those people who currently have least access to travel and mobility and will inevitably lead to a significant increase inequality in Northern Ireland society. In addition, the Committee believes reduced access to travel and transport will increase the pressure on other public services and ultimately lead to higher costs for Government. Finally, the proposals will make meeting climate change targets impossible and lead to catastrophic long term consequences for Northern Ireland society.

We believe basic accountability and good governance requires that such significant decisions must be made elected representatives, not the civil service. Given the disproportionate and obvious impact of the measures on Section 75 groups, the Committee is recommending that, in line with the statutory equality duties, mitigating measures are considered prior to

final decisions being made. Where savings are required, measures should be targeted more at people in society who currently experience the wider opportunities and travel choice afforded by the car rather than those who already have limited or no access to travel and mobility.