



**Imtac's comments on the
public consultation and draft equality impact
assessment on the proposal to extend
the Northern Ireland Concessionary Fares
Scheme to people aged 60-64**

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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 Comments on the consultation process

- 2.1 Imtac recently published guidelines to assist the DRD to meet policy commitments made in the Accessible Transport Strategy around consultation with older people and disabled people. The Committee commends the Department for making the consultation document available in alternative formats and including a textphone contact for people who are deaf or hard of hearing.
- 2.2 However the Committee would make the following recommendations that should inform and improve future consultation processes.
 - Consultation processes should last 12 weeks not the 8 weeks advertised
 - As well as advertising alternative formats consultees should be offered the opportunity to respond in a manner that suits them best – eg over the telephone
 - An “easy read” version of the consultation should be developed to make the process more accessible to everyone including people with a learning disability

- Consideration should be given to additional forms of consultation, such as focus group meetings or public meetings, to supplement the written consultation. Given this is a policy that affects both older people and disabled people the Committee believes that such measures would have been appropriate.

3 Comments on the public consultation

- 3.1 Imtac welcomes the proposed extension of the current Scheme to allow free travel for older people from 60 to 64. This gives older people here parity with national concessionary schemes that exist in Great Britain.
- 3.2 Despite the change Imtac must express frustration that the Scheme will continue contain serious inequalities between those older people and disabled people currently eligible for concessions. These inequalities mean that the scheme brings little or no benefit to many older people and the majority of disabled people. The inequalities also seriously undermine the objectives and policy commitments made by the DRD in the Accessible Transport Strategy (2005). Statistics contained in the current consultation and the previous Review indicates that the vast majority of disabled people eligible have not applied for the concession. With regard to older people whilst uptake is high the majority of smartpass holders either never use the concessions or use it infrequently. Imtac is concerned that analysis of usage of the scheme highlights the limited impact of the Scheme in tackling social exclusion and that more work is needed to ensure that those who currently do not use the Scheme can. Two issues are of particular concern.
- 3.3 Firstly the majority of disabled people here qualify for half-fare travel only. There is no valid explanation as why these groups of people should not enjoy the same concessions as other disabled people such as those who registered blind or indeed older people other than a lack of resources. The

Departments own ATS makes clear that the cost of travel is a barrier for both older people and disabled people. Northern Ireland is now the only administration in these islands that does not include free travel for disabled people as a part of the concessionary travel scheme a disparity that is again impossible to justify.

3.4 The second issue is the difficulty many older people and disabled people have using the current scheme. This may be because public transport available might not be accessible or for people living in a rural area public transport is simply not available. Alternatives to public transport including taxis and door-to-door are often more expensive than public transport.

3.5 Despite the frustrations of the Committee we acknowledge that resources are finite and Government here had to make difficult choices. We recognise that there is currently little or no scope to make further extensions to the Scheme. However Imtac would like the Department to consider the following recommendations:

- Make extending free travel to disabled people the priority when resources become available
- Make a policy commitment that future extensions of the Scheme will apply equally to older people and disabled people (in line with the ATS)
- Cost and consider making travel free on door-to-door services supported by the Department
- Pilot a taxicard/taxivoucher scheme here to assess its effectiveness as an alternative to the current Scheme

4 Comments on the draft EQIA

4.1 Imtac is disappointed that the EQIA applies only to the proposed extension to the Scheme and not the Scheme itself. Clearly such a narrow focus on such limited numbers of people will have relatively few negative impacts on any of the equality groupings and as such a detailed response is pointless.

4.2 However as we have clearly identified disabled people outside this narrow age band are significantly disadvantaged by the current Scheme both in comparison with older people here but also in comparison with disabled people living in every other part of these islands. To some extent this results from changes made to Schemes elsewhere since the last full EQIA on the policy in 2004. Given this Imtac feels that the Department should have considered an impact assessment on the whole policy rather than the proposed extension only.

5 Other comments

5.1 Imtac previously completed a joint report with the Mobility and Inclusion Unit in DRD around the provision of information about policies and services. We identified that the current provision of information around the Concessionary Fares Scheme was inadequate. In response to our report the Department committed to work with us to improve information about the Scheme once changes were in place. Imtac would ask the Department to set out a clear timetable for this work being completed.

6 Conclusion

6.1 Whilst Imtac welcomes the proposed extension to the Concessionary Fares Scheme to older people aged 60 to 64, the Committee remains frustrated that many inequalities continue exist within the scheme. Disabled people in particular continue to be disadvantaged here in comparison the equivalent schemes elsewhere. Imtac acknowledges the finite resources available to Government here but we would ask that DRD give a formal response to recommendations made in this response.

Imtac Members 2008/09

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

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