



Comments from Imtac on the Programme for Government Consultation Document

(December 2016)

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About us

The Inclusive Mobility and Transport Advisory Committee (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.

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.

Imtac receives support from the Department for Infrastructure.

General comments

Imtac welcomes the opportunity to make further comment on the development of the Programme for Government. As with the previous consultation on the Draft Framework¹ the Committee is seeking delivery in two key areas. Firstly does the Programme for Government contribute to the development of a more inclusive society where disabled people and older people can participate on an equal basis with others. Secondly, and linked to the first, does the Programme for Government advance a more inclusive transport system where older people and disabled people have the same opportunities as everyone else to travel when and where they want.

In line with these priorities Imtac has focused its response on Delivery Plans within the Programme for Government linked to three key Indicators. These are the Delivery Plans of the Department for Infrastructure (DfI) linked to Indicators 23 (Average journey time on key economic corridors) and 25 (Percentage journeys which are made by walking, cycling and public transport) and the Department for Communities (DfC) linked to Indicator 42 (Improving the quality of life for people with disabilities and their families). In its response Imtac has sought to determine whether its comments through previous consultation have been incorporated in the current consultation.

¹ [Comments from Imtac on the Draft Programme for Government Framework](#)

The omission of older people from the Programme for Government

In its submission to the consultation on the draft Framework in July 2016 Imtac raised concerns about the omission of older people and the implications of an increasingly ageing society from the Programme for Government. The Committee notes the statements made on page 8 of the Programme for Government Consultation Document seeking to reassure older people and their organisations, suggesting Section 75 monitoring would ensure the PfG was working for older people. Imtac believes this response is insufficient and fully supports the calls from the Commissioner for Older People, older people and their organisations for the final Programme for Government to explicitly reflect the priorities of older people in its Outcomes and Indicators.

Comments on the DfI Delivery Plan related to Indicators 23 and 25

In its previous submission Imtac had raised a number of issues about the proposed approach to Indicators 23 and 25. In particular the Committee recommended that the Delivery Plan should (1) include a clear recognition of the role transport plays in promoting social inclusion, (2) recognise the link between land use planning, travel and reducing the need to travel and (3) ensure that interventions are inclusive and that disabled people and older people are involved in the process.

Imtac wish to commend the Department for Infrastructure for responding to these issues in its published Delivery Plan. The “Overview of Indicators” clearly sets out the challenges ahead and explicitly recognises the social impact transport has in contributing to a fairer society. Both the “Overview” and “Proposals to Shift the Curve” recognise the key role land use planning plays in travel and reducing the need to travel. The Delivery Plan contains important commitments to have “a transport network that is inclusive and accessible to all” and contains a number of important references to the Accessible Transport Strategy 2025. Finally, and perhaps of greatest importance, the Delivery Plan explicitly recognises Imtac as key Delivery Partner, placing disabled people and older people at the heart of its Delivery Plan. The Committee believes that in many ways the Delivery Plan reflects a Department that is ahead of the curve compared to other Departments in meeting its equality obligations including the UN Convention on the Rights of People with Disabilities (UNCRPD).

The Committee supports the broad direction of travel set out in the Delivery Plan. It is difficult, however, to fully endorse the Plan because many of the measures included are broad and lack necessary detail and are not prioritised. The absence of any budgetary information also raises questions over whether some of measures will be implemented. Imtac acknowledges that some of these issues are not within the control of the DfI. Given the absence of detail it is vital that commitments made in the Delivery Plan on accessibility and engagement with Imtac are funded and delivered, as these are key to successful implementation.

Imtac has the following specific comments that it believes will improve the plan:

Page 16 refers to accessibility being “a major consideration” in the development of policy and services. The Regional Transportation Strategy (RTS) published in 2002 made accessibility a “requirement” when spending public money. Imtac recommends that the wording on page 16 be amended to reflect the RTS commitment.

In relation to measures to reduce demand (pages 20 & 21) the Department correctly identifies the importance of land-use planning. Imtac believes that in addition to land-use planning other measures aimed at reducing the need to travel can help reduce demand. Digital technology can play a major part in this. In the spirit of cross Departmental working the Delivery Plan should acknowledge the importance of (1) improving digital infrastructure and (2) promoting digital inclusion (ensuring older people and disabled people in particular can benefit from technology) can play a key role in reducing the need to travel.

Imtac supports initiatives to promote active travel. The Committee is also reassured by recent personal commitments given by the Minister to seek to improve pedestrian journeys. However this commitment is not currently reflected in the Delivery Plan with nearly all the emphasis on active travel on cycling. As almost every journey involves being a pedestrian the final Delivery Plan must give greater prominence to pedestrian journeys, investing in infrastructure that makes pedestrian journeys safe and accessible. As an indication of a direction of travel Imtac recommends that the Department commit to developing a Pedestrians Strategy as a

matter of urgency and to rename the Cycling Unit the Pedestrian and Cycling Unit with immediate effect. In the majority of circumstances Imtac supports the development of separate, safe cycling infrastructure, not shared facilities with pedestrians. Investment in infrastructure should be made in conjunction with measures designed to influence cycling behaviour, for instance raising awareness of the impact of pavement cycling on pedestrians.

Imtac notes the intention of the Department to promote the 10 qualities advocated by Living Places in its approach to developing infrastructure. The Committee was not consulted during the development of this guidance. Whilst Imtac concurs with much of the content the guidance, page 32 of Living Places advocates the use of shared space in urban design. Shared space has been the subject of huge controversy in Great Britain with disabled people and older people in particular feeling the concept designs them out of our towns and cities. As a concept shared space has been subject to numerous reports, reviews and inquiries. It is disappointing that the positive interpretation of shared space presented in Living Places has not been balanced by the views of others who do not share enthusiasm for what they believe is a flawed design concept. This reinforces the need for broad consultation and the involvement of disabled people and older people in the design of policy. Imtac wants to make clear it does not support the use of shared space² and recommends that it should not be used in any circumstance in the future design of public realm and other infrastructure in Northern Ireland. If places and spaces are to be genuinely accessible and inclusive for pedestrians then vehicular traffic should be diverted totally away.

Imtac welcomes and supports the broad proposals to make public transport a more attractive and accessible option particularly for people who have no access to the car. The Committee also welcomes the broad commitment to improve connections from rural areas to the key transport network, however the Committee also believes people living in urban areas would also benefit from improved services that connect to the mainstream services. For some time Imtac has reflected in its advice³ the need to radically

² [Imtac Statement on Shared Surface Streets](#)

³ [Flexible Future - lessons from the development of demand responsive transport services](#)

rethink current rural and urban services funded by the Department. Much more information and further detailed consultation is essential on all the proposed measures in the Delivery Plan relating to public transport. This includes the proposed review of Ulsterbus Services, the targeting of resources to Goldline services and work of the Integrated Passenger Transport Project. Imtac expects the Department to meet commitments made in the Delivery Plan to engage with Imtac and to build accessibility for disabled people and older people at each stage of this process.

Imtac recommends that the Department explicitly mention groups targeted for proposals around “Behavioural Change” and that specific mention is made of older and disabled people (page 28).

Imtac recognises and supports the need for demand management measures as a tool in changing travel behaviours. The Committee supports the use of parking constraint (both in the core of towns and cities and communities in close proximity) but recommends that the Department make clear within the Delivery Plan that concessions will be made for certain essential users such as Blue Badge holders.

Related to the above the Department needs to give greater strategic consideration to the enforcement of the Blue Badge Scheme. Imtac will recommend that Blue Badge Holders are exempt from many of the demand management measures. The Committee has concern that this will automatically increase the value of the Badge and experience elsewhere shows unless anticipated, fraud and misuse by non-disabled people may become a serious problem. The Committee recommends that the Department builds in improved enforcement of the Blue Badge Scheme as part of demand management measures.

Comments on the DfC Delivery Plan for Indicator 42

In its response to the previous consultation on the draft PfG Framework Imtac had welcomed the inclusion of a specific indicator around disabled people. However the Committee did raise concerns that Government appeared not to be adopting a rights based approach to this indicator based on the principle that disabled people should be able to participate in all aspects of society on an equal basis with others. Imtac was also concerned about the passive portrayal of disabled people in the previous

consultation. In its response the Committee made a number of recommendations setting how positive changes could be achieved.

The Delivery Plan for Indicator 42 contains no reference to rights. Instead the Indicator is linked to Outcome 8 (We care for others and we help those in need) and Outcome 9 (We are a shared society that respects diversity). The consultation document contains the following broad commitment under Outcome 8 – “helping and caring for the most vulnerable in our society, ensuring provision is adequate to meet their needs.” Imtac believes strongly that this approach is wrong. The approach and wording of the Delivery Plan and the Programme for Government Consultation Document reinforces perceptions that disabled people are the problem, are less fortunate than others in society and should be helped from a sense of obligation and pity.

As currently drafted the Delivery Plan for Indicator 42 is also incompatible with Governments legal obligations. Outcome 3 (We have a more equal society) of the Programme for Government Consultation Document contains the important commitment “to fulfil our equality obligations including compliance with international human rights conventions.” These obligations include the UN Convention on the Rights of People with Disabilities. UNCRPD makes clear that there is an obligation on Government to take all steps to ensure that disabled people can participate in society on an equal basis to others. The Delivery Plan makes no mention of UNCRPD.

Some may argue that it is actions not rights that matter. Imtac disagrees totally with this argument. Measures based on a humanitarian or medical approach rather than a rights based approach towards disabled people will simply not work. Past experience shows this approach results in increased frustration on the part of disabled people and conflict between them and Government. By way of practical example the Delivery Plan contains the commitment to design public awareness initiatives to counter negative attitudes to disabled people. Imtac questions how attitudes towards disabled people can be changed when Governments approach is based on the premise that disabled people are vulnerable and in need of help from wider society rather than on disabled people who are active and equal members of society. Similarly a Delivery Plan that seeks to provide adequate

rather than equal provision across the range of interventions can only further alienate and marginalise disabled people.

Despite the barriers created by society, disabled people have and continue to make a huge contribution to the development of a more equal society. Many of the recent positive developments such as the introduction of Audio Visual Information Systems on buses, the strengthening of the Disability Discrimination Act and the retention of the Independent Living Fund (for existing users) has been driven by disabled people themselves. Imtac is another positive example of disabled people actively contributing to the achievement of change. It is disappointing that the Delivery Plan does not recognise the contribution disabled people themselves have made to achieving change.

Imtac recommends that the DfC radically rethink its approach to Indicator 42. It is essential that it becomes a primary indicator for Outcome 3 – We have a more equal society. The Commitment and Context of the Delivery Plan must be similarly redrafted to reflect Governments international equality obligations under UNCRPD, based on a society where disabled people can participate on an equal basis to others. Finally the Delivery Plan must be redrafted to reflect the positive contribution disabled people already make towards changing society in Northern Ireland. The Delivery Plan must seek to build on the achievements of disabled people to date by making clear that disabled people themselves are equal partners in delivering the change needed.

In addition to the above Imtac have the following specific comments that it believes will improve the plan:

Imtac has reservations about the suggested approach to measuring the success of Indicator 42. The Committee welcomes the decision by the Department to commission further research into how to measure success of the indicator and recommends the Department await the outcome of the research before progressing. It is important that any steering group for the research involve disabled people from outside public services. Imtac would welcome the opportunity to contribute to the research.

Imtac welcomes commitments to bring forward legislation to ensure that disabled people have the same protection under the law as their peers in the rest of the UK. At the consultation events

the Department suggested that prioritising some changes in legal protections might be preferable to trying to achieve total parity. Imtac does not support this approach. Given the Department will only have one opportunity in the current mandate to make legislation; it is essential that parity be achieved within this timescale. Given that Government has legal obligations under UNCRPD in relation to legal protection; it is not acceptable under any circumstance to leave aspects of legislative reform until the next Assembly mandate.

Imtac welcomes the proposal to develop a Regional Disability Forum and for disabled people to be included in this forum. Further engagement is required with disabled people and their organisations about the make up and recruitment of the Forum. Great care must be taken to ensure the Forum is independent of large organisations for disabled people who provide services on behalf of Government and from the Department for Communities itself so it can effectively perform the function of a “critical friend”.

Linked to the above, the establishment of a Regional Forum must not restrict existing and future opportunities for disabled people to participate in policy and service development. Imtac is one such example of an existing organisation with over 10 years experience of working with Government. A key aspect of the work of the Forum must be to promote and develop wider opportunities for disabled people to participate, both strengthening rather than replicating existing opportunities such as Imtac, as well as supporting new ideas and opportunities.

A key aspect of enabling disabled people to participate more is ensuring that all necessary support is readily available including assistance with the cost of travel, the provision of accessible information and communication support. Imtac believes that the Department for Communities can play a key role in ensuring that this support is resourced and available both to the proposed Regional Disability Forum but also to wider Government and bodies such as Imtac. By way of example the Department could purchase and loan out portable hearing loop systems and other communication systems which would make meetings and events accessible to more disabled people.

Imtac welcomes the commitment in the Delivery Plan to develop a Northern Ireland standard for accessible communications. When

agreed Imtac recommends all Government Departments and all statutory bodies adopt the standard. Furthermore Imtac recommends that any organisation in receipt of Government funding be required to meet the standard.

Imtac welcomes the commitment to work with DfI on the Accessible Transport Strategy 2025 (ATS 2025) and public realm accessibility. Given that Imtac is a key partner in the DfI Delivery Plan and has co-designed the ATS 2025 with DfI officials, its specific role in relation to transport should be acknowledged in the DfC Delivery Plan.

Imtac believes many of the other measures contained in the Delivery Plan are too broad and lack any clear target or outcome. Much work is required on the part of officials from all Departments to reassure disabled people that the Programme for Government marks a significant change in approach from the past.

Imtac has two suggestions for additional measures. The first is based on changing attitudes towards disabled people. The Committee recommends that DfC work with organisations of disabled people to develop a Disability Equality Training (DET) course (designed and delivered by disabled people). Once agreed DET should be adopted as a standard across all Government Departments and all statutory bodies. In addition any organisation in receipt of Government funding must be required to undertake DET. The second additional measure relates to digital inclusion. Given our previous comments in response to the DfI Delivery Plan, the Delivery Plan for Indicator 42 must include measures to make the benefits of digital technology more accessible to more disabled people.

Conclusion

Based on its key priorities Imtac believes there are positives and negatives within the current Programme for Government Consultation Document. On the positive side the inclusive approach of the Department for Infrastructure offers the opportunity to make progress towards a transport network where disabled people and older people can have equal access. On the negative side Imtac does not believe the approach set out by the Department for Communities will significantly advance a wider society where disabled people can participate on an equal basis

with others. Intac remains concerned about the lack of priority given in the Programme for Government to older people and their issues and the implications this has for an increasingly ageing society. Despite reservations the Committee wants to work with all parties to ensure that the final Programme for Government delivers fully for older people and disabled people.