



**Comments from Imtac on proposals for The Rail
Passengers' Rights and Obligations (Designation &
Enforcement) Regulations (Northern Ireland) 2016**

November 2016

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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. These formats include:

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Michael Lorimer
Imtac
Enterprise House
55-59 Adelaide Street
Belfast BT2 8FE

Telephone/Textphone: 028 9072 6020
Email: info@imtac.org.uk
Website: www.imtac.org.uk
Twitter: @ImtacNI

About Imtac

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 comment on the proposals. Despite uncertainty about the future following the vote by the UK to leave the European Union, Imtac supports the extension of a common set of rights for disabled people across Europe when travelling on different modes of transport. The Committee is therefore broadly supportive of the regulations with regard to Rail Passengers' Rights and Obligations.

Specific comments on the proposals

Imtac has two specific comments on the proposals. The first relates to complaint handling, the second, and closely linked to the first, is raising public awareness of rights.

In relation to complaints handling the Committee has some concerns about the designation of the Department as the complaint handling body. For most transport related issues in Northern Ireland the Consumer Council has a statutory role in complaints handling. This role includes handling complaints around other EU Regulations relating to passenger rights around air and sea travel. From a consumer perspective it would be preferable if there was one point of contact for passenger complaints around transport issues in Northern Ireland. It is the recommendation of Imtac that the Consumer Council be involved in complaints handling around the proposed passenger rights.

Related to the above is the issue of raising public awareness of the rights. Rights are only effective if passenger know about them. Imtac recommends that the Department develop a plan to raise public awareness of the new rights. The Consumer Council already undertakes

activities to promote awareness of passenger rights including promotion of rights specifically relating to people with reduced mobility and EU Regulation. Making provision for a role for the Consumer Council within the regulations would, in the opinion of Imtac, increase opportunities to raise public awareness of the new rights.

Conclusion

Imtac would like to thank the Department for the opportunity to comment on the current proposals. The Committee would welcome the opportunity to work with the Department and others in developing detailed proposals around the implementation of the regulations.