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**Comments from Imtac about the All-Ireland Strategic Rail Review**

 **(January 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](http://www.imtac.org.uk). In addition we will provide information in a range of other formats including:

* Large print
* Audio versions
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If you would like this publication in any of the formats listed above or if you have any other information requirements please contact:

Michael Lorimer

Imtac

Titanic Suites

55-59 Adelaide Street

Belfast BT2 8FE

Telephone/Textphone: 028 9072 6020

Email: info@imtac.org.uk

Website: [www.imtac.org.uk](http://www.imtac.org.uk)

Twitter: @ImtacNI

**About Imtac**

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

Imtac’s aim 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 (hereafter referred to as the Department).

**Context**

Deaf people, disabled people and older people make up a significant proportion of the population of the island of Ireland. There is a strong correlation between age and impairment, most disabled people are older people. Projections indicate that older people will make up an increasing percentage of our community.

Both jurisdictions on the island are signatories to and must meet obligations under the articles of the UN Convention on the Rights of People with Disabilities (UNCRPD). Article 9 of the Convention requires state parties to:

“To enable persons with disabilities to live independently and participate fully in all aspects of life, States Parties shall take appropriate measures to ensure to persons with disabilities access, on an equal basis with others, to the physical environment, to transportation, to information and communications, including information and communications technologies and systems, and to other facilities and services open or provided to the public, both in urban and in rural areas…”

Historically our rail infrastructure has been designed such that it excludes many disabled people and older people. Stepped access to rolling stock, stations and other infrastructure is the most basic barrier that has made travel difficult or impossible for many. Other physical barriers include the lack of accessible facilities such as wheelchair user’s spaces on trains, priority seating, accessible toilet facilities, accessible parking and tactile surfaces on platforms and elsewhere.

The way services have been provided has also been a barrier to rail travel. Often staff are not available to provide assistance or are unaware of how to provide the most appropriate assistance. Inaccessible infrastructure and poor services often mean disabled people and older people must give notice to use services and are limited to travel to and from certain accessible locations.

The accessibility of the rail network has improved over the past 20 years, driven by both domestic and European legislation and regulation. This means we now have much improved rolling stock and improved access and facilities at many stations. However, as indicated by page 18 of the consultation, significant physical accessibility constraints remain on the rail network across Ireland, which mean that disabled people and older people cannot travel on an equal basis to others.

For Imtac the key priority for any All Ireland Strategic Rail Review is to recognise the barriers that making using current rail services difficult or impossible and to include strong commitments to remove these barriers and make rail travel accessible to all in society (meeting obligations placed on both jurisdictions as signatories to the UNCRPD).

**Comments on the consultation**

Imtac welcomes and supports the All Ireland Strategic Rail Review. Whilst the Committee has no objections and is broadly supportive of goals and objectives of the review we are very disappointed that there is no goal or objective designed to remove the barriers to travel by rail currently experienced by large numbers of Deaf people, disabled people and older people.

Our key recommendation for the Review is the inclusion of an additional goal to **“Develop an inclusive all Ireland rail network, accessible to all”.**

The Committee also recommends that this goal be supported by the following objectives:

* to improve our rolling stock to ensure it is step free, inclusive, and accessible to all
* to improve our rail infrastructure to ensure it is step free, inclusive, and accessible to all
* to improve the delivery of our rail services to ensure they are inclusive and accessible to all

As part of the next stages of the review and relating to the implementation of the additional goal and objectives recommended by Imtac, the Committee also recommends that a feasibility study be undertaken into the introduction of level access trains to the rail network across the island of Ireland.

**Conclusion**

Imtac welcomes the opportunity to contribute to the current consultation on the strategic review. The Committee is disappointed that the proposed review fails to fully acknowledge the importance of a rail network that is accessible to everyone. In our experience this is often an indication that Deaf people, disabled people and older people have not been involved in the process to date. To ensure this is addressed in the future and to promote a better understanding of issues highlighted in this response the Committee would welcome the opportunity to meet with officials working on the Review.