



**Comments from Imtac on the Draft Budget 2015 / 16:
Spending and savings proposals within the
Department for Regional Development**

December 2014

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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 Regional Development.

General comments

Imtac recognises that the proposed savings the Department are required to make in 2015 / 16 are unprecedented. The Committee also acknowledge that the scale of the savings required will inevitably have an impact on frontline and other services. However we are greatly concerned that the measures proposed in the draft Budget will **(1) generally have a disproportionately negative impact on older and disabled people, (2) will have a particularly devastating impact on the many older and disabled people who have limited or no access to a car and (3) significant reduce the ability of Imtac to carry out it's advisory role.**

The Department's own assessment seriously underestimates the impact of the proposed savings. The Department has made strategic and policy commitments and has legal obligations which mean it is required to do more to reduce the impact of savings and cuts to services on disabled people, older people and other Section 75 groupings.

Comments on the consultation arrangements

Imtac is disappointed by the short 4 week consultation period, which includes the Christmas holidays. The measures proposed in the consultation have the potential to deliver the most swingeing reductions to travel and transport in Northern Ireland in decades. The short consultation reduces the likelihood of the Department obtaining the full

range of the public's views on the proposals and makes it particularly hard for disabled people, older people and other "hard to reach" groups to respond. Whilst acknowledging timescales are not in the control of the Department, such short consultations should not be repeated in the future.

Saving proposals and disabled people and older people

Imtac recognises that the saving proposals will impact on all business areas of the Department including Departmental staff. However our concern is primarily the impact of the proposals on disabled people and older people. A number of key proposals will impact directly and negatively on disabled people and older people. These are the proposed reductions in funding of public transport services, reductions to the funding of the Rural Transport Fund and Transport Programme for People with Disabilities (including reductions to the Imtac budget), and the impact of savings on the maintenance of street lighting and pedestrian footways.

The consultation document contains very little detail on the specific reductions to public transport, RTF and TPPD services compared with the detail about impact on other Departmental services. This makes providing an accurate assessment of the impact of savings in these areas difficult. However by talking to Translink and other providers Imtac has been able to gather some information about the likely significant and severe impact on disabled and older people through the reduction of services and support.

We understand that the proposed savings may result in the removal of town services in 14 locations and reductions in town services in 7 other locations. Off peak Ulsterbus and NIR services will also be reduced significantly and Translink Rural Transport Fund services removed completely. There is also an indication that a number of staffed stations may close. Many bus services in Belfast will remain untouched by the saving proposals. Fares are expected to increase markedly as a result of saving proposals. Whilst this will not impact on free concessionary pass holders it will impact on disabled people who hold the Half Fare Smartpass.

Both Translink and DRD have access to data about the usage of services under threat by the saving proposals through programmes such as the Concessionary Fares Scheme. However even without access to this data it is not unreasonable to assume that the main groups using off peak bus services are older people, disabled people, younger people, women and people with dependants. It is also not unreasonable to assume that many of the people who use these services have limited or no access to alternative means of transport. To illustrate the point in Great Britain off peak services are often unprofitable but are supported by local authorities as “socially necessary” providing a lifeline for people with no alternative transport. As a direct result of the draft Budget unprofitable but socially necessary public transport services in Northern Ireland appear likely to be removed.

The Committee understands that the Department intends to reduce funding for the RTF and TPPD by £2 million in 2015 / 16. Imtac also understands that DARD propose to end funding to the Assisted Rural Travel scheme which provides limited concessionary travel to people using rural community transport. Many of the services provided under the two programmes provide “safety net” services for people who have no alternative means of travel. These services are already overstretched and many disabled and older people tell us they are frustrated and dissatisfied with the services provided. Reductions in town services and rural Ulsterbus services will only increase demand for alternative services. Reduction in funding will further reduce the ability of providers to meet growing and unrealistic expectations and demands. Many people have told Imtac that the cost of rural transport is already prohibitively high when and where subsidy from DARD is not available. With this subsidy likely to be removed costs will escalate further and be beyond the reach of many older and disabled people.

The Department has told Imtac that we should expect a reduction in funding in 2015 / 16. This amount is insignificant in relation to the overall savings required (£18000) but is 27% of our current Budget. This follows reductions in levels of funding of 37% since 2010. The Department has made high-level strategic commitments to support the work of Imtac. By reducing our budget by such a drastic amount the

Department are clearly not meeting these commitments and, we believe, are not treating Imtac equitably in comparison with other funded organisations. Before agreeing to reductions in our funding Imtac will seek a formal explanation from the Department as to why reductions in funding to the organisation are so severe and how the Department propose to meet their strategic commitments to engage with disabled people and older people in the future.

All journeys involve some use of the pedestrian environment. Imtac has undertaken work, which makes clear that for many older and disabled people using the pedestrian environment presents major challenges. Many disabled people tell us that accidents in the pedestrian environment can have a devastating personal impact on their confidence. Savings proposed for reductions in street lighting and footway maintenance will make pedestrians journeys even more challenging and hazardous for disabled people and older people. Given the impact of reductions in other services many disabled people and older people (particularly those living outside Belfast) will be required to make greater use of the pedestrian environment to undertake routine day to day activities. Increased barriers due to poor maintenance and a lack of street lighting will make this impossible for some and very difficult for others as well as being less safe for everyone.

Analysis of the Department's assessment of the impact of the saving proposals

The major impact of the draft Budget on disabled people and older people is a significant reduction in travel opportunities, particularly for people living outside Belfast. The people affected most by the proposed changes are those people with no alternative to using current services. It is accepted that access to transport is vital in enabling people to work, undertake education, access key services and to have a social life, reducing or removing access to transport effectively excludes people from society.

It is of great concern to Imtac that nowhere in the Department's assessment of the impact of saving proposals is there any

acknowledgement of social impact of removing travel opportunities by reducing access to mainstream public transport services and safety net alternative services. A major impact of the proposed savings will be to increase levels of social isolation and exclusion amongst disabled people, older people and others. The changes will have a devastating impact on the lives of thousands of disabled people and older people. The savings will in the short and longer term cost Government in Northern Ireland many times more than the short-term savings achieved.

The omission of the social impact of saving proposals means that the general assessment and in particular the high level Equality Impact Assessment significantly underplays the impact of the proposals on not only disabled people and older people but also groupings such as younger people, woman and people with dependents who all disproportionately rely on public transport services. For example the Department cannot stand over the claim in the equality impact assessment that savings in relation to public transport will only have a minor impact on older people and more worryingly be of no consequence to disabled people. As currently drafted the Equality Impact Assessment is wholly inadequate. If the Department is to meet its statutory equality obligations a full and thorough Equality Impact Assessment should be carried out on all the saving proposals affecting services mentioned above utilising all the data available.

The Department has other statutory obligations relating to disabled people including a duty to promote the participation of disabled people in public life and to promote positive attitudes to disabled people. The implications of saving proposals detailed above will directly contravene these duties reducing the ability of many disabled people to undertake day-to-day activities. Proposed reductions to the Imtac budget will directly reduce one of the few opportunities across Government in Northern Ireland to participate in public life and contradict a key action in the Department's Disability Action Plan.

The savings plan takes no account of current DRD strategic commitments. The New Approach to Regional Transport clearly recognises the need to create a fairer society through the provision of alternatives to the car, explicitly recognising that for many including

disabled people travel by car is not an option. The strategy also commits the Department to improve travel opportunities outside Belfast. The Transport Act (NI) 2011 also places a duty on the Department to have regard to accessibility when securing the provision of public passenger services.

More specifically the Department has also published an Accessible Transport Strategy committing the Department to ensuring disabled people and older people have increased opportunities to travel. The cumulative effect of the proposed savings means the Department will fail to deliver on these commitments. The ATS also commits the Department to support Imtac as the key source of information and advice around travel and transport for disabled people and older people. The ATS requires Imtac to perform a number of related activities including an annual Work Programme. Proposed reductions in funding will make this nigh on impossible for the Committee. The Department is currently working with Imtac to develop a successor document to the ATS. Given the levels of service reductions proposed and a lack of resource and commitment to engage directly with disabled and older people, it is difficult to see how the Department can produce a new credible strategic commitment to improving services for older and disabled people.

The DRD, as with all Government as whole, has obligations to meet in relation to the UN Convention on the Rights of People with Disabilities. The measures included in the draft Budget and Savings Proposals directly contravene many of rights of disabled people contained the Articles of the Convention. However Imtac would draw the Departments attention to the following articles:

- Preamble to the Convention provision (o) on the right of disabled people to access decision making about issues that affect them.
- Article 4(3) General Obligations – Disabled Persons right to participate and be actively involved in decisions which affect their daily lives
- Article 29(b) The Right to Participation in Public Life - The right to participation in non-governmental organisations and associations

concerned with public life of the country.

- Articles 9 The Right to Accessibility – including transport services
- Article 19 The Right to Live Independently
- Article 20 The Right to Personal Mobility
- Article 26 The Right to Habilitation and Rehabilitation – with specific importance to people living in rural areas

Reducing the impact of savings – our recommendations

Imtac believes that the impact of the savings on the majority of the population who use the car will be negligible. Savings will create inconvenience not hardship for the majority. However the impact savings on people who have no choice but to use public transport and other services will mean extreme hardship. This includes many thousands of older and disabled people. We would strongly urge the Department to look at ways that vital local buses services and the core bus network can be given greater protection within the proposed Budget. If these services are removed past experience tells us that they will not come back.

The Department must look to bring in additional resources to reduce the impact of savings on people without access to a car. Proposals for increased on-street car parking charges and charging for parking on-street in more locations has been supported by Imtac in the past and should be explored as a matter of urgency. Such measures are clearly a fair way to demonstrate the impact of savings is not concentrated on the most vulnerable in our society.

The Department does not allow Imtac to hold any reserves. As a result we cannot protect ourselves against the impact of reduced funding by using reserves. The Committee is aware that other organisations funded by the Department have been allowed to develop significant reserves including many of the Rural Community Transport Partnerships. The Department should ensure that reserves held by funded organisations

can be utilised to minimise the impact of cuts to services and ensure limited resources are distributed more equitably.

Even if the Department is able to reduce the impact of these savings Imtac acknowledges that some reduction in services is inevitable. Given this it is essential that the Department take a more strategic approach to a reduced level of funding, reviewing as a matter of urgency existing programmes and services to ensure local communities receive the best services resources allow. Imtac has argued that services currently delivered under RTF and TPPD are not the most efficient and effective way of delivering services and would benefit from such a review. This could be incorporated into ongoing work by the Department looking at integrated transport and the planned review and renewal of the Accessible Transport Strategy.

Of much greater significance are the resources allocated to the Concessionary Fares Scheme in Northern Ireland. The Draft Budget makes clear that the Scheme will be protected and substantial additional resources have allocated for 2015 / 16. In principle Imtac is supportive of free travel for older people and disabled people. However as a means of reducing social exclusion the scheme remains a blunt instrument, benefiting people with good public transport links or people who can travel to access public transport most. The impact of the proposed savings will increase this inequality. Many more people will have a Smartpass but no service to use it on. People who use concessions on popular commuter services to travel to and from work will by and large see no change, whilst people who rely on off-peak services to access a range of local and regional services will see options shrink or disappear. The Committee believes that the impact of the saving proposals will see growing disparity and inequality around access to the scheme amongst older and disabled people, which will be increasingly impossible to ignore. We recognise the importance and value of the concessionary fares scheme to older people in particular but we feel in the current climate a debate is needed around how we ensure as many people as possible can continue to benefit from the scheme. In particular the Committee would like to see a discussion brought forward by the Department about how to prioritise resources within the

Concessionary Fares Scheme to offer greater protection to older and disabled people who rely completely on public transport services.

Finally the Committee believes Imtac, itself, is a valuable resource to the Department. Imtac provides important, strategic advice around the development of policy and services and helps the Department meet a range of statutory and strategic obligations. The reductions proposed for Imtac will effectively mean a reduction in staffing, reducing our one member of staff to part-time, reductions in meetings and tasks performed by the Committee, and the closure of our current office. Imtac believes that the relatively small savings involved in reductions to the Imtac budget will result in poorer services being delivered to disabled people and older people and result in much greater costs to the Department and wider Government in Northern Ireland. Whilst the Committee acknowledges it must contribute to the savings required we would like to discuss, as a matter of urgency, how this could be achieved whilst maintaining an effective advisory role. We do not believe this possible under the proposed reductions.