



## **Comments from Imtac on the Review of the Door-2-Door Scheme and associated EQIA**

**January 2013**

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## General comments

Imtac welcomes the opportunity to comment on the current consultation around the Review of the Door2door Scheme in Northern Ireland. The Committee also welcomed the opportunity to meet with officials from the Department prior to the publication of the consultation. We believe this pre-consultation was useful and helped shape the emerging proposals in a positive way.

Imtac is supportive of the broad principles outlined in the document. In simple terms door2door is a necessary service and will be essential for some disabled people well into the future. For other current users of the service, mainstream public transport offers a better service but better information and targeted support is required to encourage these users to use mainstream services. With the improvements made to public transport it makes sense for Government policy to adapt to maximise usage of public transport, freeing up door2door for those users who cannot use public transport. The arguments put forward in the consultation broadly mirror the advice given by Imtac in a number of documents published by the Committee<sup>1</sup>.

Whilst agreeing with the broad principles outlined in the consultation document, Imtac differs on some of the suggested changes to eligibility, which we will highlight in our response. The Committee also believe more detail is required around the two other recommendations in the consultation. This restricts the Committee from fully endorsing these recommendations. However we have made a number of suggestions, which we believe, could be incorporated under Recommendations 2 and 3, which the Committee believes are the type of measure required to progress these recommendations. We would welcome the opportunity to discuss our suggestions with officials at an early date.

Imtac would like to highlight one other general issue. As well as door2door the Department also supports specialised alternative transport services in rural areas. These services have their own

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<sup>1</sup> See [The future of Door2Door services](#) and [Assessment of current eligibility criteria for Door2Door transport services in NI](#)

eligibility criteria, operating areas, hours of operation, differing costs etc... Imtac believes there is merit in undertaking a holistic review of all specialised services with a view to delivering a better all round service for the communities involved and obtaining greater value for money for Government. In our comments on the recommendations we will highlight the potential benefits of a more holistic approach to delivering alternative services.

## **Comments on the recommendations**

### Recommendation one – changes to eligibility

Imtac previously published a paper on door2door eligibility<sup>2</sup>. We identified a clear rationale why someone may need door2door based on issues around impairment, environment and personal factors. These included:

- The distance to the nearest bus stop may be too far for somebody to walk
- A person may not have the confidence or skills to use bus services independently
- Some disabled people cannot use mainstream public transport because of the access restrictions of vehicles such as restrictions placed on the size of wheelchair that can be accommodated on-board
- Some disabled people can use public transport if they are feeling well and the weather is good but rely on door2door at other times

It is extremely difficult to develop precise criteria for Door2door eligibility based on our rationale that do not exclude some people affected by the issues above. For example someone may not qualify for a certain benefit on the grounds of being able to walk a certain distance but the nearest bus stop may be well beyond distances used to measure eligibility for the benefit or the distance that the person is actually capable of walking. Similarly people

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<sup>2</sup> See [Assessment of current eligibility criteria for Door2Door transport services in NI](#)

with a learning disability will generally not qualify for higher rates of mobility benefits but may never have the confidence or skills to travel independently on public transport. Furthermore other disabled people have conditions (for example MS) that affect their mobility intermittently – purely benefit-based criteria are likely to exclude these people.

The majority of the proposed revised eligibility criteria are linked to qualifying benefits. Whilst Imtac does not disagree with the criteria proposed, the Committee believes that it is imperative that the Department retains a safety net within the criteria to ensure that those people who genuinely need the service are not excluded. The Committee agrees with the Department that using GP's is not the best way to provide this service. We believe there are better examples from other providers of similar services of meeting the requirement for a safety net. For example Transport for London allows people to apply for Dial-a-Ride in London by completing a paper based questionnaire<sup>3</sup> based around their difficulties accessing public transport.

One issue that should reinforce the need for a safety net in eligibility criteria is Welfare Reform and in particular the migration from DLA to PIP. The consultation recognises that figures from DSD suggest that up to 20% of current recipients of high rate mobility component of DLA will not be eligible for the equivalent under PIP. Leaving aside the merits or otherwise of the changes to benefits, this means that these people will automatically lose access to a range of Government services and concessions linked to travel including door2door. It is highly likely that many of these people potentially need the service based on our rationale detailed above. In our Annual Report for 2012<sup>4</sup> Imtac advised Government that “where necessary Government should introduce proposals which mitigate against any negative impacts around changes to benefits.” Retaining a safety net within the eligibility criteria for door2door is one way the Department could demonstrate their commitment to this.

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<sup>3</sup> See [Transport for London Dial-A-Ride services](#)

<sup>4</sup> See [Imtac Annual Report 2012](#)

Imtac welcomes the proposals in the consultation for interim measures that ensure that disabled people can still access the Door2door service during the transition from DLA to PIP.

Imtac also welcomes the proposal to renew membership of door2door every three years. This will enable the Department to collect data and make an assessment of the impact of other policies designed to help people use mainstream public transport services. Renewing membership also presents the Department with an opportunity to provide existing members of door2door with information about the limitations of the service as well as information about mainstream alternatives. The Committee is particularly keen to work with the Department to ensure that the future system for application and reapplication is straightforward and that all information provided to people in connection with the service and other services is accessible and inclusive. This includes ensuring materials are designed using clear print guidelines, that alternative formats are clearly advertised as being available and mechanisms are in place to ensure that members receive information from the Department in their preferred format.

One final point needs to be made around eligibility criteria. Looking at statistics for current members it is unlikely that the measures proposed will reduce the membership of door2door by more than a few thousand. Based on current usage and demand this will mean that there are still more members of scheme than there are vehicles/services to meet potential demand. From Imtac's perspective restricting eligibility criteria is unlikely to reduce the demand for the service. This is best achieved by providing and promoting better alternatives to the service and highlighting the limitations of door2door to users in comparison with these alternatives.

### Recommendation two – Flexible and integrated delivery

The detail around recommendation two in the consultation document is somewhat vague and lacks detail. Imtac does welcome the proposed engagement with stakeholders to develop this recommendation further and we look forward to future discussions with the Department. In the interim Imtac would make the following points.

Firstly, as public transport becomes more accessible to more people the specific requirements of remaining users of the Door2door service will be greater. This applies to many aspects of the service but most specifically to vehicles used to deliver the service. It is essential that vehicles used to deliver the service are accessible to users of larger wheelchairs and have no steps. Imtac has been clear in the past that low-floor minibuses offer the best vehicle to base future services around. The Committee has also indicated that utilising local taxi services is acceptable where the vehicle meets passenger requirements.

Secondly, many people who rely on door2door do so because public transport services are located too far to walk to for access. The Department illustrates in the paper the unsustainable cost of door2door. However rather than ask how to reduce the cost of door2door by changing the nature and delivery of the service, instead should we not ask what we can do to make mainstream public transport services more accessible to door2door users? For example could the routes of town services be reviewed to reduce walking distances for people or could these services be made more flexible. On the simplest level adapting these services into “hopper” services which could be hailed anywhere along the route (providing it is safe to stop) would broaden the accessibility of mainstream public transport.

Thirdly, services such as door2door (and to a certain extent rural dial-a-lift) are para-transit services. This means that they exist in parallel to public transport because the people who use them cannot obtain access to public transport because of where they live, accessibility of vehicles etc - for this reason integrating Door2door service with the public transport network is difficult. There are however many other different models of flexible or demand responsive transport that are more effective (from a passenger and cost perspective) in meeting demand and linking with wider public transport services. Imtac has published a paper<sup>5</sup> highlighting the benefits of these types of demand responsive transport services. The Committee view use of these types of flexible services as the most effective way of reducing reliance on expensive door-to-door transport in both urban and rural areas.

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<sup>5</sup> See [http: Flexible future - lessons from the development of demand responsive transport services - April 2012](http://flexiblefuture.org.uk/wp-content/uploads/2012/04/Flexible-future-lessons-from-the-development-of-demand-responsive-transport-services-April-2012.pdf)

Even with these improvements there will always be the need for specialised door2door but demand can be reduced significantly.

Finally, in many locations where door2door operates there is little distinction made by communities between the town and its rural hinterland. Despite this we have developed two separate alternative services for the town and country. This has led to significant anomalies around operational areas and where people would like to travel. For example someone could live on the edge of a town and wish to travel to a village close to their home but be prevented because of inflexible boundaries. Conversely some door2door areas group a number of urban areas where distances that can be travelled are much greater. Rural Dial-a-lift operates a completely separate service with larger operating areas. It is Imtac's view that it does not make sense (from a passenger perspective or from a value for money perspective) to try and meet local community need through two stand-alone and separate services. The Committee believes that an opportunity has been missed to look at the provision of a more holistic alternative service in many areas with an overall review of both the provision of door2door and rural dial-a-lift.

### Recommendation 3: Travel Assistance Measures

Imtac broadly welcomes the proposal to look at a range of measures to support users of door2door to use mainstream public transport where this is possible. This proposal recognises that one gap in transport that needs to be addressed is overcoming the barriers both perceived and physical that deters some users getting to and accessing the main public transport network. We welcome the Departments commitment to engage with the Committee to look at options to extend the support available to disabled people and older people.

Whilst the Committee also welcomes the proposed measures around existing schemes such as the Travel Buddy Scheme and the Travel Safe Guide the Committee also believes more can be done to broaden the range of support available. In terms of travel training Imtac has drafted a paper highlighting the benefits of such schemes. One of the chief recommendations of this paper, which will be published shortly, is that Government (including DRD) should link in with other providers of these programmes and could encourage the development of other schemes through practical



guidance similar to that developed by DfT<sup>6</sup>. Regarding the provision of information more could be done to link in with Translink to better promote services through a revised Access Guide and to look at low-cost promotional campaigns to promote the benefits of using public transport services. Information about door2door should also be revised highlighting the limitations of the service. London Dial-a-Ride has produced a good example of this type of information<sup>7</sup>.

One note of caution does need to be made around the accessibility of public transport. Whilst it is true to say most town and city bus services offer low-floor access, many inter-urban and rural services use vehicles with stepped access. Similarly whilst access to new trains is excellent access at many unstaffed halts remains problematic. In a number of places in both the EQIA and consultation document the Department makes claims along the lines 100% of rail services being fully accessible or 80% of buses accessible which is clearly not the case. Imtac plan to publish a report shortly assessing the accessibility of public transport. The report is likely to highlight that problems remain with the accessibility of both bus and rail services. It is essential that disabled people and older people are given a realistic picture of public transport if they are to have the confidence to use those services in the future.

## **Comments on the EQIA**

Given that door2door is a service designed to be used exclusively by disabled people it is very difficult to comment on how the proposals impact on disabled people. From an equality perspective Imtac believes that it is essential that disabled people (including many older people) have the same opportunities to use mainstream public transport as everyone else. The consultation marks an important recognition of the Department's role in helping this to happen which is positive (although there is a lack of detail on how this will be achieved). However the proposal to restrict eligibility could potentially mean that people are unnecessarily excluded from the service and this could cause real hardship to the

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<sup>6</sup> [GOV.UK Guidance: Travel Training: good practice guidance](#)

<sup>7</sup> [Transport for London: Your guide to Dial-a-Ride services](#)

lives of these individuals. On this basis the impact is clearly negative and the Committee would advise the Department to look again at the proposed criteria and provide a safety net for people who do not meet the revised criteria.

## **Other issues**

Imtac has highlighted in previous papers other ways demand for door2door could be managed. Whilst none of these proposals on their own will resolve issues with the service they may result in more equitable access to the service and therefore merit further discussion. Some of changes could include:

- Restricting usage to a certain number of journeys per week or setting a quality standard of providing a minimum one return journey per week per member
- Guaranteeing new members their first trip thereby ensuring services do not settle into set usage patterns which exclude potential new users
- Raising the cost of door2door to the same as local bus service fares to provide the incentive to use buses (this would have to apply to both rural and urban services to be fair)

## **Conclusion**

Imtac thanks the Department for the opportunity to comment on the proposals arising from the review of Door2Door Services. The Committee would welcome the opportunity to discuss our comments with officials at the earliest opportunity.