



**Comments from Imtac on the consultation on the abolition of DPTAC; and the best options for successor arrangements should DPTAC be abolished**

**September 2012**

Imtac is committed to making information about our work accessible. Details of how we can do this and how to contact us are included on the next page.

## **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. These formats include:

- Large print
- Audio cassette or CD
- Daisy disc
- Braille
- Electronic copies on disc or via email in PDF or word
- Easy read

We will also provide information about our work in other languages if you require this.

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  
Fax: 028 9024 5500  
Email: [info@imtac.org.uk](mailto:info@imtac.org.uk)

## **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 welcomes the opportunity to comment on the options for successor arrangement for DPTAC should it be abolished. The Committee contributed to the consultation in 2011 on the future of DPTAC. It was our preference then that DPTAC be retained in its current format.

As a Committee our remit includes not just disabled people but older people as well. This recognises the important correlation between age and disability. Imtac acknowledges that given this correlation much of the advice given by DPTAC in the past already addresses issues for older people without formally being required to do so. However Imtac has no objections to a broadened remit under any future arrangements which includes older people.

## **Key Considerations for Imtac**

In making an assessment of the different options contained in the consultation document Imtac has its own considerations which we would like to see reflected in any new arrangements. These are as follows:

- 1 There is a continued need for some form of mechanism by which disabled people can provide advice to Government around transport issues***

Transport and mobility are key to the delivery of wider Government objectives around inclusion and delivering greater rights to disabled people. DPTAC since its inception has had a pivotal role in ensuring that improvements have made to the accessibility of the transport

system. It is clear from both research and the gradual introduction of improvements to public transport under legislation that disabled people will continue to find travelling difficult for the foreseeable future. Any decisions, therefore, around the future of DPTAC should be based on Governments continuing need for advice about transport from disabled people.

**2     *Any future arrangements must continue to involve the participation of disabled people***

One of the important aspects of the work of DPTAC that appears to have been overlooked in the consultation paper is the participation of disabled people in the advisory role of DPTAC. It is essential that any future arrangements involve the participation of disabled people rather than just their representative organisations as indicated in the consultation. By ensuring this Government will also be meeting obligations under Article 29 of the UNCRPD in relation to the participation of disabled people in public and political life. The existence of DPTAC also assists Government meet other obligations under UNCRPD including Article 9 in relation to accessibility.

**3     *Any future arrangements must enable Government to continue receive independent advice around issues for disabled people***

It is important to understand that disabled people are not all the same and that a range of factors (not solely predicated on someone's impairment or disability) can mean some issues are more significant for some people than others. Often there is a conflict between issues that are important for some disabled people and not for other disabled people. This diversity can be confusing for policy makers in that they hear so many differing and often conflicting views. One of the great benefits of organisations such as DPTAC and Imtac is that Government can obtain a consensus view on what are often difficult issues. Such a consensus view is often difficult or impossible, in our experience, when engaging with individual and often differing representative organisations.

**4     *Any future arrangements must ensure that Government receives advice that reflects the best interests of all disabled people***

A key element of future arrangements highlighted in the consultation is advice that is "representative of all disabilities and disabled groups". As

our previous point indicates this is a difficult challenge because of the diversity of disabled people. Imtac believes that it is impossible to create a body that is fully reflective and representative of disabled people. There is also a danger that attempts to do so will result in a simple box ticking exercise. Again one of the key aspects of the past work of DPTAC (and Imtac) is that members are expected to act in the best interests of all disabled people, putting aside their own interests if necessary. From Imtac's perspective maintaining a source of advice based on a strong "community of interest" amongst disabled people is more important than chasing a notional ideal of representativeness.

**5 *It is important that future arrangements enable Government to receive the best advice***

Currently members of DPTAC are recruited through an open and transparent process based on merit. Members reflect a mix of people ranging from people with specific technical knowledge to others with more "real life" experience of being a disabled person but each member brings knowledge, experience and expertise to the Committee. Imtac believes that the current arrangements for recruitment of members does give Government some reassurance that the advice received from DPTAC is robust. We are concerned that some of the options detailed in the consultation make no reference to how people or organisations will be selected to participate in new arrangements, their qualifications for providing such advice and what safeguards are in place to ensure that Government receives the best possible advice. It should also be pointed out that members and the chairperson of DPTAC are currently appointed by Ministers and that this arrangement, more than any of the other options detailed in the consultation, ensures the level of accountability to Ministers required by the DfT.

**6 *It is important that future arrangements continue to reflect a two-way communication process between Government and disabled people***

Imtac is concerned that the consultation document reflects a general frustration that DPTAC pursues its own priorities over that of Government. Whilst we fully acknowledge advising on Government policies and priorities are a fundamental aspect of the work of DPTAC, the Committee also has obligation to raise issues that are a priority for disabled people with Government and Ministers in particular. It is worth noting that one of the recommendations of the 2008 review of DPTAC was that the Committee should raise more issues with Ministers "off their

own bat.” Imtac would be concerned that some of proposed options rely too much on ad hoc engagement confined to issues that reflect Government priorities only, thereby losing the two-way communication we believe is vital to good policy making. Imtac recognises that this process can often lead to tension between the advisory committee and the sponsoring Department but we would argue that such tensions are necessary in developing better policy.

## **7 Any new arrangements must be more flexible and cost-effective**

Imtac does concur with arguments presented in the consultation document that elements of DPTAC’s current statutory remit does make it difficult for the Committee to be more flexible and cost effective. In the current climate it is essential that any new arrangements allow the Committee to be flexible in terms of membership, meetings and remit. As Imtac is not statutory we do have flexibility over many of these issues. However DPTAC’s statutory status is valued by disabled people and their organisations and we believe greater weight could have been given in the consultation to reviewing and revising DPTAC’s statutory remit to provide it with the desired flexibility.

As a Committee we agree that any future arrangements must be cost effective particularly given the current restrictions in Government finances. However we find it difficult to make any assessment of value for money based on the information provided in the impact assessments. For instance many of the options listed contain staff cost lower than that of those for the current DPTAC secretariat without any explanation of why. Also some options appear to suggest that staff costs would be the only costs taking no account of obvious other costs associated with the proposed way forward including venue hire, travel expenses, communication support etc. Regardless of the way forward chosen (including the option of a revised statutory DPTAC) Imtac believes that costs can be contained at acceptable and realistic levels.

### **Imtac’s position on the options presented in the consultation document**

Based on our own key considerations Imtac does not believe that any of Options 1,2,3,4, 5 or 6 on their own offer Government an effective successor arrangement to DPTAC. We believe the most effective solution would be a revised statutory remit for DPTAC which is not so restrictive. A non-statutory specialist body that combines elements of

some of options listed and preserves the best elements of the existing Committee may also provide an alternative to current arrangements. Imtac believes that safeguards built around the implementation of both options can ensure that these options can be cost effective whilst ensuring that Government receives the best possible advice. We would also encourage that any future arrangements should include in its terms of reference mechanisms to ensure engagement with similar bodies in devolved administrations, including Imtac, and important bodies such as Equality 2025.

## **Conclusion**

Imtac thanks the Department for Transport for the opportunity to contribute to the current consultation around the future of DPTAC. The Committee hopes the Department find our response helpful. We would welcome the opportunity to provide additional feedback if required including the lessons that could be learned from current arrangements in Northern Ireland.