



**Comments from Imtac on the Equality Scheme for the
Department for Regional Development**

March 2011

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About Imtac

- 1 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.
- 2 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.
- 3 Imtac receives support from the Department for Regional Development.

Comments on the Equality Scheme

- 4 Imtac welcomes the opportunity to comment on the Department's Equality Scheme. The Committee has decided to concentrate our comments on the Audit of Inequalities and related Action Plan.
- 5 The Audit of Inequalities provided in the document is comprehensive and provides a good overview of how the work of the Department impacts on the Section 75 groupings. Imtac would like to make a number of suggestions to further improve the Audit.
- 6 The Accessible Transport Strategy (ATS) was published in 2005 after extensive consultation with disabled people and older people. The ATS provides a wealth of both qualitative and quantitative data on the barriers that make travel difficult for disabled people and older people. All of these barriers are as relevant today as they were in 2005. The Audit of Inequalities should highlight how the policies of the ATS underpin the Departments approach to addressing the transport requirements of older people and disabled people.
- 7 In relation to the data and evidence used in the audit Imtac recommends that the Department also include "Making the Connections – Final Report into Transport and Social Inclusion" produced by the Social Inclusion Unit at Westminster in 2003. The report makes the clear link

between car ownership and social inclusion/exclusion and identifies the groups in society most likely to be effected by social exclusion. An understanding of the report and its findings would for instance help to explain why rural services are disproportionately used by the groups highlighted on page 13 of the audit and why people aged 25-64 tend not to use these and other services.

- 8 The Department need to be cautious in relation to buggy spaces on buses (page 11 of the audit). Not all Translink buses have dedicated buggy spaces and this often leads to parents using the wheelchair user space. The Committee has heard first hand of the experience of wheelchair users who have been refused access to buses or some cases verbally abused for wanting to access the dedicated wheelchair space on buses. We have been talking to Translink for sometime about this issue and have been able to agree new signage on a bus that moves us away from the idea that buses are “baby friendly”. It would be helpful if the Departments Equality Scheme were worded to reflect the respective priority that should be given to parents with buggies and wheelchair users.
- 9 The Department also need to be cautious about claims that operators provide staff with “disability and diversity”. Imtac has recently looked at this issue in relation to people with a learning disability. We found that providers of door2door and rural transport primarily used Midas. Midas contains an element of disability awareness training but is far from being comprehensive disability training. Perhaps a better wording would be “staff receive training that includes some disability and diversity issues.”
- 10 Imtac believes that the Audit should do more to emphasise the importance of the Blue Badge to the mobility disabled people and older people. There are over 100,000 Blue Badge holders in Northern Ireland – nearly ten times the membership of Door2door for instance. The Audit should include statistics the numbers of Blue Badges to reinforce the importance of the scheme to older people and disabled people here. The Department should also include reference to decriminalised parking enforcement under the measures undertaken by Roads Service. Enforcement of accessible

parking and the Blue Badge has improved since the introduction of DPE making it easier for many Blue Badge holders to park in our towns and cities. This can be backed up by statistics for PCN's issued.

- 11 Specific mention should also be made of traffic management proposals for Belfast City Centre (Belfast on the Move). These potentially have significant implications for how disabled people and older people access the city centre – where they park, where they get on and off the bus etc. Given the likely impact on disabled people and older people we have asked that each proposal emerging from Belfast on the Move be subject to EQIA.
- 12 In relation to the issue of access to pedestrian areas it is important that the Equality Scheme and Audit of Inequalities provide a balanced assessment of the issue. It should be made clear that whilst restricted access negatively affects disabled people who use the car unrestricted access would negatively affect other disabled people (such as people with a visual impairment) who would find moving or parked vehicles in a pedestrian area a hazard.
- 13 With regard to the assessment of inequalities the Department needs to be cautious about using data to fit with current policies or services. For instance all available data (included in the Audit) suggests that use of public transport by disabled people is low despite the investment in services. The data also shows that disabled people are less likely to have access to a car and more likely to rely on expensive taxis. Rather than look at the reasons why disabled people are not using public transport more the Departments identifies an opportunity through the assessment to boost door2door usage. Imtac has been pressing the Department for some time to change this approach and look at measures that maximises disabled people and older people usage of public transport at the same time as reducing the pressure on door2door services. There are many ways this can be done most of which have already been identified by the Departments own ATS. The assessment and action plan needs to be more balanced reflecting the need to support more disabled people and older people to use public

transport whilst maintaining alternative services such as door2door for people who can't use public transport.

- 14 The Assessment and Action Plan need to reflect better the importance of the Blue Badge to disabled people and older people. In particular careful consideration needs to be given to policies that may improve the scheme or that may restrict the scheme. With this in mind we would encourage specific mention in the Audit and Action Plan of future measures to combat Blue Badge misuse as well as the development and roll out of Belfast on the Move proposals.
- 15 Imtac agrees with the Department that variations in the uptake of the Concessionary Fares Scheme are worth investigating. However we believe that this should not just be confined to older people in the West of Northern Ireland. Uptake by disabled people of the half-fare smartpass is very low efforts should also be made to improve this. Also the Department's own Review also highlighted the majority of older people do not use the smartpass or use it only once or twice. The Audit should acknowledge both these issues and the Action Plan should contain measures to improve uptake and usage for both older people and disabled people.

Conclusion

- 16 Imtac hopes the Department find these comments useful. The Committee are keen to develop an improved working relationship with the Equality Unit. One of our Working Groups plan to meet with officials from the Unit shortly. In the meantime any queries about this response can be directed through the Imtac secretariat.

Contact us

- 17 Please contact Michael Lorimer if you have any queries about this paper, would like it in another format or language or would like to help us implement any of the actions. Michael can be contacted at:

Imtac
Enterprise House
55-59 Adelaide Street

Belfast BT2 8FE

Telephone: 028 9072 6020
Textphone: 028 9072 6016
Fax: 028 9024 5500
Email: info@imtac.org.uk

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