



Comments from Imtac on the proposals for public  
transport reform

**February 2010**

This document is also available in alternative formats. To request a copy in an alternative format or for any other queries please see the "Contact Us" section of this response or visit our website at [www.imtac.org.uk](http://www.imtac.org.uk).

## **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.

## **General Comments**

- 4 Imtac commends the Public Transport Reform team for the positive engagement with the Committee prior to the publication of the current consultation. Early engagement with stakeholders is an essential part of policy development and we hope that the positive approach continues as proposals are taken forward.
- 5 The Committee would like to congratulate the Department for the inclusive approach it has taken to the current consultation. In particular the use of positive images of disabled people using transport and the production of an easy read summary of proposals are to be welcomed.

## **Our concerns about the proposals**

- 6 The focus for Imtac around any proposals that change the current organisation of public transport here are the benefits changes will bring for passengers and in particular disabled people and older people. Our members are less concerned about who organises the provision of public transport services as long as that organisation delivers for passengers including older people and disabled people.

- 7 It is clear from the information provided that maintaining the current situation is not an option moving forward. There is no doubt the changes proposed have the potential to deliver good services for older people and disabled people. In principle Imtac is supportive of all the proposals as outlined in the questionnaire accompanying the consultation. However all the documentation, including the draft Equality Impact Assessment, makes the assumption that improved services are an inevitable consequence of new structures. Imtac contends this is not necessarily the case unless important commitments are made by DRD around disabled people and older people. Without these commitments Imtac cannot fully endorse the proposed way forward.
- 8 Imtac is disappointed that the particular requirements of disabled people and older people are not fully recognised in the consultation. If the new arrangements are going to work for older people and disabled people, meeting their requirements must be explicitly recognised as a key priority for Government in making the changes. The DRD must set out the clear strategic direction that building accessibility for disabled people and older people is a condition of investing in public transport here. Without clear commitment from a policy level it is unlikely that the other tiers envisaged by proposals will deliver benefits to disabled people and older people.
- 9 The proposed Public Transport Agency has a key role in ensuring services improve for disabled people and older people. If the majority of services are to be contracted in future it is essential that the standards for these contracts build in access for disabled people and older people as a given. If this fails to happen disabled people and older people could potentially be more disadvantaged than is currently the case. For example current capital funding for new vehicles means that these vehicles must meet accessibility regulations, the proposed switch to revenue funding means vehicles do not have to be accessible unless specified under the contract.

- 10 The concerns of the Committee around the potential for contracted services not to deliver for disabled people are reinforced by our experiences of the Department contracting services such as door2door. It is our contention that the specifications for these services were not good enough and that this has impacted on the potential benefits of these services to disabled people and older people. This is particularly relevant to the vehicle specifications for current door2door services.
- 11 Many of the other proposed functions of the PTA such as marketing and information and ticketing need to incorporate accessibility for disabled people and older people. Failure to do so will restrict access to transport for many disabled people and older people.
- 11 On a similar issue the PTA will have responsibility for designing the network. As well as being responsible for ensuring this network is efficient and represents value for money the PTA has a responsibility to ensure that socially necessary services are also available. Balancing these requirements will be a challenge. Under the proposed changes the potential exists for efficiency and value for money to outweigh social concerns and for the overall current service provision to be reduced. This will impact disproportionately on older people and disabled people.
- 12 The third tier of the proposed new structures, the operators, will not deliver change for older people and disabled people unless clear direction is given from the first two tiers. This can be achieved through a clear policy direction, clear standards and strict enforcement of standards

### **Addressing our concerns**

- 13 In order to maximise the benefits of the proposed changes for disabled people and older people Imtac advises the Department to make the following commitments in any report arising from the current consultation.

- 14 Firstly we recommend the Department to make a formal commitment to build in accessibility for disabled people and older people as a condition of any change arising out of the proposals. This is in line with a previous commitment given in the Regional Transportation Strategy (RTS).
- 15 Secondly we recommend that the Department commit to formally set out a clear policy framework for ensuring disabled people and older people benefit from any new arrangements. Such a framework already exists in the Accessible Transport Strategy (ATS). We recommend the Department explicitly commits to implement the policies of the ATS when developing and operating the new structures.
- 16 Thirdly we recommend that the Department commit to mainstreaming accessibility for disabled people and older people is within the functions of any Public Transport Agency. This means that the requirements of disabled people and older people will be factored in key areas such as services requirements, promotion of services, local planning, performance levels, ticketing and fares.
- 17 Fourthly we recommend that the Department commit to mainstream accessibility for disabled people and older people through the delivery of services. This means clear and accessible standards for things like vehicles, provision of information, passenger facilities, ticketing, fares, training and complaints handling. The accessibility of services must be part of future performance monitoring and standards must be strictly enforced.
- 18 Fifthly we recommend that the Department commit to engage with older people and disabled people during the development and operation of new arrangements. This commitment for engagement must apply to each tier of any new arrangements. In line with the ATS Imtac should be explicitly recognised as the main source of

independent information and advice on transport issues for disabled people and older people.

- 19 Finally but perhaps most importantly we recommend that the Department commit to develop greater expertise and knowledge about transport issues for older people and disabled people within any new structures. The consultation makes clear that some of the functions of new agency will require particular expertise not found within the civil service. Imtac contends that making services accessible to disabled people and older people requires specific expertise and the Department and proposed PTA need to address the current gap in skills in this area.

### **Comments on the Equality Impact Assessment**

- 20 The draft EQIA contends that the only potential negative impacts on older people and disabled people are for staff currently employed in organisations affected by the changes. Imtac agrees that it is important to recognise the potential negative impacts on staff involved in the proposed changes and to propose mitigating measures. The draft EQIA makes the assumption that for passengers the proposed changes will only bring improvements.
- 21 As we have already highlighted Imtac does not believe there is enough evidence to support this assumption. We contend that if poorly implemented the changes could result in a worse service for disabled people and older people. In our response we have highlighted that the Department can ensure this does not happen by making and implementing six key commitments around disabled people and older people.
- 22 Imtac recommends that the Final EQIA recognise that the proposed changes could potentially negatively impact on disabled people and older people. By way of mitigation against this potential negative impact we would ask that the Department make the commitments we have recommended.

23 In addition to their duties under Section 75 of the Northern Ireland Act 1998 the Department has specific Disability Equality Duties under the Disability Discrimination Order. These duties require the Department to promote the participation of disabled people in public life and to promote positive attitudes towards disabled people. Imtac recommends that in moving forward with any future proposals the Department explicitly set out how they are meeting their Disability Equality Duties through any changes.

## **Conclusion**

24 Imtac welcomes the opportunity to comment on the proposals for public transport reform. Whilst the Committee recognises the need for change and support in principle all the emerging proposals we do not have enough evidence to say with certainty the proposals will improve services for disabled people and older people. As one of our members put it the Department are asking us to make “a leap of faith”. In responding to the consultation we ask the Department to give clear commitments specifically around disabled people and older people so we can be assured that services will improve. The Committee would welcome the opportunity to discuss our response with the Public Transport Reform Team.

## **Contact us**

25 To receive this response in an alternative format or for any other queries contact:

**Michael Lorimer**  
**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](mailto:Info@imtac.org.uk)**