



The future of Door2door services – an issues paper

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Background

- 1 This paper has been prepared in response to a request from the Department for Regional Development for comments from lmtac on the future re-tendering of door2door services in Northern Ireland.
- 2 This paper will address the strategic role door2door plays in the overall transport system. The paper will address issues around availability of the service. Finally the paper will also address key components of the door2door service and make recommendations for improvements.

The strategic role of door2door

- 3 Door2door services originated in the 1970's and 1980's as a solution to the widespread inaccessibility of mainstream public transport to disabled people and older people. Services in Northern Ireland arrived somewhat later with Belfast and Derry beginning in the 1990's and wider extension to all major towns in 2006/7.
- 4 Since the door2door concept started we have seen a revolution in the way the travel needs of disabled people and older people are recognised and met. The Disability Discrimination Act 1995 set clear accessibility standards for public transport vehicles. In Northern Ireland wider Government investment means that accessible public transport is increasingly the norm.
- 5 Of course this does not mean that door2door services are redundant. Many areas still do not have adequate accessible public transport. Even where it is available some people may not be able to access it. This may be because of the distance to the bus stop or because the person has a larger wheelchair than current vehicles can accommodate. There may also be people who can use public transport when they are well or when the weather is fine but need a door2door service at other times.

- 6 In general transport policy has adapted to recognise the wider improvements to the transport system. Many local authorities are now looking at how to maximise the investment in mainstream public transport service whilst ensuring door2door services are available to people who cannot use these services. This approach also recognises that given the likely users of future door2door services the accessibility requirements of the service will increase.
- 7 In Northern Ireland policy as set out in the Accessible Transport Strategy (2005) is in line with this change in direction. The policies set out in the ATS seek to maximise the investment in accessible mainstream public transport by removing the barriers that prevent older people and disabled people from using services. The ATS also clearly establishes that it is DRD policy to reduce the demand on alternative services such as door2door.
- 8 Since the launch of door2door in 2006 the focus from DRD has been entirely on the promotion of new door2door services without promotion of the potential better alternatives. As we will explain this has created problems. The clear strategic challenge for the future is how DRD ensures that door2door services are available to people who have no alternatives whilst ensuring people who can use accessible mainstream public transport have every opportunity to do so.

Tackling availability issues

- 9 One of the key issues for any door2door service is availability. Given the “many-to-many” nature of the service demand for this type of service always outstrips the supply. The demand for services means that many people cannot get the service, cannot get it when they want or have to book the service well in advance (where this is possible). All this means that door2door often does not meet the expectations of users and in no way offers the equivalent level of mobility offered by mainstream accessible transport.

- 10 The service in Northern Ireland reflects the difficulties of operating this type of service. There are currently 12000 members here but only around 40 vehicles to deliver the service. Anecdotally Imtac has received feedback from members in various areas that getting the service is often difficult. The same feedback also indicates that many people stop trying to get the service after a number of failed attempts. This means that although the membership may be large in some areas usage of the service may actually be confined to a relatively small number of users. The feedback we have received from users across Northern Ireland indicates that availability of the service is the major issue for members of the service.
- 11 Anecdotal feedback is not supported by official statistics. The official refusal rate across door2door services here is around 3%. However recent statistics released to Imtac by the Department indicate a wide variation between operating areas. Figures for refusals in January 2010 show that Bridge in Derry had a refusal rate of 0.15%, Chambers 2.18% and Disability Action in Belfast 19.48%. We have talked directly to both Bridge and Disability Action and it would appear that these figures are broadly indicative of monthly figures. Figures for Belfast appear to reflect the anecdotal feedback from users who find the service difficult to access. However we have also received similar feedback from users in places like Bangor, Lisburn, Newtownabbey, Newry and Omagh. The figures from Chambers do not seem to reflect this feedback. Imtac does not believe that problems of availability are solely confined to Belfast. We believe further work may be required to ascertain whether all operators are recording refusals in the same manner.
- 12 As previously stated these issues are common to many of this type of service. There are a number of ways that demand for services can be managed:
- **Increase the number of vehicles** – increasing the number of vehicles will help address some of the difficulties with availability.

However it is likely that the number of vehicles required to effectively meet the demand will be prohibitively expensive for Government.

- **Restrict eligibility** – Restricting who can use the service is another way to control demand. Imtac would not recommend this be used before a series of measures are introduced to ensure people who may be affected have the opportunity to use alternative transport services.
- **Restrict usage** – Measures could be introduced to ensure that members have more of an opportunity to use services. For example members could be restricted to a set number of journeys a week. Also new members could be guaranteed their first journey. This is unlikely to meet user's expectations of the service but will lead to more equitable access to the service.
- **Promote alternative transport options** – Many current members of door2door may be able to avail of local accessible public transport either for general travel or for specific journeys. These options may be more suitable for many current users of door2door as there is no need to book the service in advance, the service is guaranteed to be available and in many cases will be free to the users through concessionary travel. However to enable people to fully utilise these services much work has to be done to remove current barriers including issues such as improving access to information about public transport and issues around personal confidence. Promoting alternatives to door2door is a "win win" for everyone; it allows those current users of door2door who can use public transport much greater freedom to choose when and where they travel, it means that people who cannot use public transport will find that door2door is more likely to be available when they need it and by reducing the demand on door2door it reduces the substantial subsidy Government is required to pay for this type of service. In the future maximising the use of accessible public transport should be the priority for future DRD policy.

- 13 It is unlikely that any one of these measures will address the problems with the availability of the service. However a combination of all of the above could make a radical difference to user's access to the service.

Improving vehicle specification

- 14 Another factor limiting the usage and effectiveness of door2door is vehicles used to deliver the service. As we have previously stated with the wider improvements made to transport system the requirements of people using door2door services will become more specific. For example accessible public transport is only accessible to wheelchair users whose chair meets the reference wheelchair specification. People who use larger wheelchairs will need vehicles that can accommodate their chair. Research undertaken by the Department for Transport clearly indicates that people are increasingly using larger and taller wheelchairs¹.
- 15 Wider research and studies have also been undertaken into the usability and accessibility of vehicles for all disabled people². In general the findings of all this research indicate the following are requirements for any vehicle used to deliver door2door type services:
- No steps, slopes or doorsteps either at entrances or inside the vehicle
 - Roomy interior including space of mobility aids
 - High levels of comfort and safety
 - Seats facing forward

¹ "A survey of occupied wheelchairs and scooters" DfT 2005

² These include MPV (Multibus)1998 Westerlund & Stahl, Taxis for All 2002 Oxley & Stahl and the Determination of Accessible Taxis Requirements 2004 Richardson & Yelding

- Closeness to the driver

- 16 There are detailed specifications available around how these issues can be incorporated into a vehicle. The most widely respected specification has been produced by DPTAC “Specification for small buses designed to carry 9 to 22 passengers 2007”. Vehicles that meet this specification are commercially available. There are detailed specifications available for smaller taxi type vehicles but it has been impossible to produce a commercially viable accessible taxi. This was recognised in a recent consultation from DfT around improving access to taxis for disabled people. DfT has also produced research detailing the access limitations of taxi type vehicles³.
- 17 Door2door is a service for people who cannot use or find it difficult to use mainstream public transport. The reasons why people cannot access these services are complex but can be summarised in terms of difficulties getting to the transport and difficulties getting on and off the transport. Using vehicles that are easy to get on and off is an essential component of any service but particularly for a service such as door2door. The research outlined above indicates the key factors that make a vehicle accessible. Imtac believes that current vehicles used to deliver the door2door service fail to meet the requirements of users of the service (people who find it difficult or impossible to use public transport) and it is somewhat ironic that in many locations the local Translink Town Service will offer vehicles with a higher level of access and comfort.
- 18 There are two types of vehicles currently used to deliver the service. The first is a high-floor minibus with stepped side access and a rear tail-lift to allow access to wheelchair users. The majority of vehicles used are smaller taxi vehicles with again stepped side access and

³ See “Ergonomic Requirements for Accessible Taxis” DfT 2006

rear lift access. Imtac would like to make it clear that the majority of users of door2door are not wheelchair users but ambulant disabled people. These disabled people will have a variety of impairments such as arthritis, a heart condition or osteoporosis. For the vast majority of users the main obstacle in using transport will be steps. The research highlighted previously indicates that steps above 20mm will pose difficulties for many disabled people. Both vehicles used to deliver door2door have significant stepped access way in excess of the 20mm threshold, the smaller taxi vehicle also has a low ceiling height which makes access and travelling difficult and painful for many people who find stooping difficult or impossible. The taxi vehicle has a cramped interior and small uncomfortable seating both of which are not suited to users of the service. Anecdotally Imtac has received feedback that because of vehicle deficiencies people can only access vehicles with a great deal of direct assistance from drivers. This is not only undignified it can be painful. Feedback indicates that some users give up using the service because of this experience or put up with discomfort because it is the only way they will get out.

- 19 Any door2door service must offer good access for the majority wheelchair users. Modern accessible public transport allows access for wheelchair users whose chair meets certain dimensions (the reference size). Given that Door2door is a service for people who find using public transport difficult or impossible it is essential that as a minimum requirement door2door uses vehicles that allows access for people with chairs larger than the reference size. Larger buses currently used to deliver door2door can accommodate passengers with wheelchairs larger than the reference size. The majority of vehicles used to deliver the service are however taxi type vehicle and these vehicles do not allow access even to passengers whose chair meets the reference size. In particular the reduced height at entrance at the rear of the vehicle means that the many wheelchair users whose chair is high or has a high headrest cannot access this

vehicle. In many of the towns where door2door operates the taxi vehicle is the only vehicle available. Because of its design many wheelchair users will not be able to access the service in these places.

- 20 Moving forward the DRD must address the poor standards of vehicles currently used to deliver door2door services in Northern Ireland. Key to this is to use the accepted specification from DPTAC as the minimum future standard. The DPTAC specification offers low-floor, step free access, high level of comfort and access to a range of wheelchair users. Given the obvious and accepted limitations of taxis the Department should not include this type of vehicle in any future service specification. Interestingly many local authorities in GB are adopting the use of the low-floor minibuses that meet the DPTAC specification for similar type services – including Hampshire County Council, Transport for London and Strathclyde Passenger Transport Authority.
- 21 Imtac does not however dismiss the use of taxis completely. Some people who use door2door can use taxis in comfort and safety (many people with a visual impairment for instance). We believe that in these circumstances it is acceptable for operators to sub-contract journeys to local taxi operators. Such practices can help increase the number of vehicles available in areas and offset some of the additional costs in improving the standard of vehicles. Much work is needed to ensure that operators have the expertise to match the right vehicles to the right individuals.

Other issues

Hours of operation

- 22 Some debate has taken place recently between Imtac and DRD around the hours of operation of door2door with the suggestion from the Department that services could be restricted or removed in the evening. Imtac wants to make clear there is no justification for a

change in operating hours other than to save costs. We believe that such restrictions would have a major negative impact on the participation of disabled people and older people in public life. We have looked at similar schemes across the UK and no such restriction applies.

- 23 It has also been suggested by the Department that taxis could provide evening services. Given the accessibility restrictions of taxis this would effectively mean that some members of door2door would not be able to use the service during these hours.

Provision of information

- 24 The DRD must ensure that future operators of door2door provide information to members in formats that are accessible as a condition of the tender. This must apply to information about fares and billing as well as general information about the service.

Ticketing

- 25 The DRD must ensure that as a condition of the tender operators must provide users of the service with a receipt for every journey taken on door2door and that if multi-journeys have been purchased receipts indicate how many journeys are left. This information must also be provided in alternative formats to members if required.

Training

- 26 Current providers of door2door are required to train staff around disability awareness. Currently most operators use MIDAS as the basis of their training. Imtac does not feel that this training meets good practice in terms of disability training. We are also concerned that MIDAS does not cover issues for some disabled people including people with a learning disability.
- 27 Imtac recommends that the Department specify in detail in the tender the training requirements for operators of door2door services. The

tender should refer to good practice guidelines available including those produced by DPTAC and Imtac. The Department must ensure mechanisms are in place to ensure that training is carried out and that training is of sufficient quality.

Cost of travel

- 28 The current cost of door2door is £1.50 per trip. This cost to the user should not rise under any new contract for the service. In terms of equality members of the concessionary fares scheme cannot avail of the concessions on door2door. Ideally Imtac would like to see concessions available across all modes of transport and that users of door2door are not penalised because of the inaccessibility of other transport. The Committee also notes that users of Dial-a-lift in rural areas can use their concession on that service.
- 29 Imtac recognises that this issue will largely be dictated by resources available. The Committee also recognises their other issues to be resolved around the concessions available under the current Scheme including free travel for disabled people on mainstream public transport. Given these issues reducing the cost of door2door to the user is a lesser priority for Imtac than the other issues raised in this paper.

User involvement

- 30 If the service is to be effective it is essential that the Department develop mechanisms to ensure that users of door2door can be involved in future developments or raise issues that could improve the services.
- 31 One way this could be achieved is through user panels or through regular user surveys. Imtac recommends that any future mechanisms for user involvement be independent of either the DRD or operators of the service. The Consumer Council for example could co-ordinate this work.

32 Users of the service must also be able to complain about the service if they are not satisfied. Feedback we have received from users indicates that many people do not know how to make such a complaint. Moving forward Imtac would like to see a much more transparent, consistent and accessible complaints procedure than currently exists. All members should be provided with information (in a format that is accessible to them) about how to make a complaint. Imtac would like to assist the Department in developing the future complaints procedure.

Conclusion

33 Imtac welcomes the opportunity to comment on the future tendering of door2door services in Northern Ireland. In concluding our priorities for the future are in order of importance:

- Maximise the usage of mainstream public transport and reduce the demand on door2door
- Improve quality and accessibility of the existing services through clear standards for vehicles, information and ticketing, training and user involvement
- Maintain current hours of operation
- Look at ways to reduce the cost of the service to users

34 We would ask that the Department also be mindful of their statutory duties to promote equality of opportunity for disabled people and the participation of disabled people in public life when considering any changes to the current services.

Contact us

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