



**Comments from Imtac regarding the draft DRD
Disability Action Plan (DAP) 2013-2016**

March 2013

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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. 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.

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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 draft DRD Disability Action Plan (DAP) 2013-2016. Members of the Committee met recently to discuss the draft DAP. In general terms members are disappointed with the draft DAP. In common with many DAPs it is formulaic and contains little new in the way of measures. It is difficult for Imtac to identify how measures contained in the plan will either increase the participation of disabled people in public life or promote positive attitudes towards disabled people.

In line with other DAPs the DRD appear to view “public life” within the confines of public appointments. Imtac believes this is an unnecessarily narrow view of the duties. Disabled people can participate in public life outside of the public appointments systems through for example participation in consultation and, of course, membership of Imtac. Steps that remove barriers to participation, for example making information more accessible, should be viewed as contributing to the participation of disabled people in public life.

Following discussions at the Imtac Committee the secretariat met with officials within the Equality Unit in DRD. The meeting was constructive and will hopefully mark the start of a process of on-going engagement between Imtac and the team. In our response the Committee has

recommended four key changes to the draft DAP which we believe will help the Department to better meet its disability duties.

Our recommendations for improvements

Our first recommendation is that the DAP should fully recognise and utilise Imtac as a resource available to the Department in meeting its disability duties. DRD is unique amongst Government Departments in sponsoring a committee of disabled people (and older people) which has a direct input into the development of policy and services. Imtac embodies the principles of the disability duties in that our work involves the direct participation disabled people in public life and has promoted positive attitudes to disabled people amongst officials within the Department and amongst others.

The DRD DAP should contain more information reflecting the important role Imtac plays in meeting the disability duties including information about who Imtac are and what we do. Action measure 4 does relate to support for Imtac. However without more information about the work of the Committee it is not clear how this measure supports the DAP. The performance indicator/target as detailed in the draft DAP misrepresents the role of Imtac by indicating our work programme should reflect Government priorities whereas the Accessible Transport Strategy requires our work programme to reflect the priorities of disabled people (and older people).

Our second recommendation is that the Department include an additional measure committing the DRD to engage with disabled people and their organisations at an early stage of policy and service development. This measure would directly demonstrate a commitment from the Department to encourage participation by disabled people in public life and through this direct participation would promote positive attitudes towards disabled people. The action measure would also complement policy 4 of the ATS.

Imtac would welcome a role in supporting the Department in implementing such a measure. The Committee already works successfully with officials from various business areas within the Department on an ad hoc basis. This work often includes early stage

discussions. We would be happy to work with the Equality Unit to consider ways this early engagement could become common practice within DRD. Imtac would also be happy to work with the Department to identify ways to involve other organisations of and for disabled people at an early stage, particularly with regard to business areas such as water not directly connected with the remit of Imtac.

Our third recommendation is that action measure 8 be amended to include direct engagement with disabled people. Imtac views direct engagement with disabled people as essential in promoting positive attitudes within DRD. Moreover the Committee feels strongly that this engagement should start at the highest levels in the DRD.

As with our other recommendations Imtac can be a resource to the Department in meeting this action measure. We would be keen to assist with the promotion of positive attitudes more broadly within the Department outside of our day-to-day work with officials. We are particularly keen to have direct engagement with senior officials and would welcome the opportunity to discuss how this could be achieved. For example a Deputy Secretary could attend a meeting of Imtac once a year or we could organise a workshop for senior officials with Imtac members aimed at promoting understanding of who disabled people are and their issues.

By way of further illustration of the benefits of direct engagement Imtac recently worked with Guide Dogs and officials from Roads Service Eastern Division running a number of workshops for staff directly involved in maintaining and improving the pedestrian environment. The consensus on all sides was that these events were extremely beneficial to all parties and created a much greater understanding of important design issues for disabled people.

Our final recommendation relates to the action measure around accessible information. Being able to access appropriate information is crucial in enabling disabled people to participate in public life. Imtac recommends the wording of this action be strengthened committing the Department to ensuring information it produces is both inclusive and accessible.

As with our previous recommendations Imtac would like to support the Department to implement such a measure. Imtac could assist with raising awareness amongst Department officials of the importance of accessible information through workshops. We could help the Department identify further improvements that could be made to existing provision (for example greater use of online audio information), and we could assist the Department to be proactive in promoting the availability of accessible information amongst disabled people and their organisations. The increased uptake of information by disabled people would be an important indicator of increased participation.

The Committee has one final recommendation around a minor change to wording of the DAP. Action Measure 1 refers to the ATS. As an outcome measure there is a commitment to “evaluate the main achievements of the action plan”. Any successful evaluation should look at both things that have been successful and things that have not and the lessons learned from each. As this is the last ATS action plan Imtac recommends that the outcome measure should be to evaluate how effectively the ATS has met priorities and policies.

Conclusion

Imtac would like to thank the Department for the opportunity to comment on the draft DAP. We hope our comments are constructive. The Committee would like to reinforce our commitment to working with the Department generally and the Equality Unit in particular to support the Department in the effective implementation of the disability duties.