



Assessment of current eligibility criteria for door2door transport services in Northern Ireland

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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.

Purpose of this paper

As part of our annual work programme 2010/11 Imtac committed to look at the current eligibility criteria for door2door transport in Northern Ireland. The purpose of this paper is to assess whether current eligibility arrangements are the most appropriate in ensuring that those people who most need the service can get to use the service.

What is door-to-door transport?

Door to door is a specialised transport service for disabled people. Originating as a concept in the 1970's door to door recognises that using mainstream public transport is often difficult or impossible for some disabled people and provides an alternative service for the disabled person in their locality. Disabled people must become a member of the service before using it and must pre-book journeys.

In Northern Ireland door2door transport is available in all towns and cities with a population of over 10,000.

Why do we need door2door?

Since the emergence of door2door in the 1970's we have seen a revolution in the accessibility of mainstream public transport. Under the Disability Discrimination Act 1995 all new buses,

coaches and trains must meet accessibility regulations. Investment by Government in Northern Ireland means that the majority of public transport here now meets these accessibility standards meaning that potentially many more disabled people can use mainstream services.

Despite the investment in services all evidence suggests that usage of public transport by disabled people continues to be lower than that of non-disabled people. The NISALD¹ survey showed that 83% of respondents said they rarely or never use public transport. The Northern Ireland Travel Survey² indicates that people with limiting long term illness make substantially less use of public transport than people without. Finally statistics³ around the uptake of the Half-fare smartpass indicate that only a small proportion of those eligible have obtained this concession.

Based on these figures Door2door will remain essential to some disabled people for whom barriers still exist that prevent them from using public transport. Many of these barriers have been identified in the Accessible Transport Strategy⁴. Examples of these barriers include:

- The distance to the nearest bus stop may be too far to walk for somebody
- A person may not have the confidence or skills to use bus services independently
- Some wheelchair users cannot use mainstream public transport because of restrictions placed on the size of wheelchair that can be accommodated onboard
- Some disabled people can use public transport if they are feeling well and the weather is good but rely on door2door at other times

¹ Northern Ireland Survey of People with Activity Limitations & Disabilities (2007)

² Northern Ireland Travel Survey 2006-2008

³ Policy Review of the Northern Ireland Concessionary Fares Scheme 2007

⁴ Accessible Transport Strategy for Northern Ireland 2005

Why eligibility is important?

Operating any door-to-door type transport service is difficult. With potentially many people wanting to use the service and wanting to travel to many different locations meeting the demand is often a challenge. Often users cannot make the journeys they want and either must be flexible about when they travel or are not able to make the journey. The demand on services often limits the benefits of the service to disabled people.

From an operational perspective eligibility is a key way demand for the service can be managed. The purpose of eligibility criteria is to ensure the service is targeted at those disabled people who either find it impossible or difficult to use mainstream public transport.

Given the changes since the door-to-door concept started in the 1970s and 1980s it is reasonable to assume that fewer disabled people require the service today than in the past. Significant recent investment in accessible public transport in Northern Ireland means that many more users of the current door-to-door service could potentially use mainstream transport providing the appropriate services and support are put in place. It is therefore sensible to look at eligibility for the service on a periodic basis both in terms of making sure people who need the service can get the service but also in terms of what additional support could be put in place to enable more people to use public transport.

Current arrangements

The membership of door2door services in Northern Ireland is centrally managed by the Department for Regional Development. The eligibility criteria are the same for all services regardless of location. People are **automatically** eligible for the service if they meet one of the following criteria:

- Receipt of the higher rate mobility component of Disability Living Allowance
- Receipt of the higher rate care component of Disability Living Allowance
- Receipt of the higher rate care component of Attendance Allowance
- People who are registered blind
- People aged 80 years or older

Applicants must provide proof of eligibility under these criteria. The DRD carry out checks with the relevant statutory agency to confirm eligibility.

People who do not automatically qualify for the scheme through access to a benefit or through age can become members if their doctor confirms they find it difficult or impossible to use public transport. Applicants are asked what difficulty they have using public transport.

At the end of 2009/2010 there were 11,394 members of door2door across Northern Ireland. Figures supplied to Imtac by the Department for Regional Development indicate that just under 30% of members qualify under the 80 or over age criteria, 25% of members qualify under Mobility Component of the Disability Living Allowance criteria, 14% of members qualifying through referral by doctors, 7% of members qualify under the Attendance Allowance criteria, 6% of members qualify as Registered Blind and 4% of members qualify through the Care Component of DLA criteria. This leaves around 14% of current members who have accessed the service through other reasons outside of the established eligibility criteria. No information is available to quantify what these other reasons are.

Comparison with other schemes

As part of this report we looked at eligibility criteria for other door-to-door schemes mainly operating in Great Britain⁵. Broadly these schemes used four models for eligibility:

- Access to certain benefits only
- Access to certain benefits with the option for membership if verified by an independent person usually a doctor

⁵ We looked at schemes run by all the main Passenger Transport Executives including London, Manchester, Merseyside and Strathclyde. We also looked at schemes operating in smaller cities such as Cambridge.

- Access to certain benefits with an option of self-certification outlining the difficulties applicants have using public transport
- Self-certification based on the evidence provided by the applicant on their difficulties in using public transport

Benefits under which individuals qualified for the service vary from location to location but generally all include Higher Rate Mobility Component of Disability Living Allowance.

In nearly every case including locally applicants are asked to provide information about their impairment – for example if they are a wheelchair user, blind or partially sighted, have a learning disability. This information does not form part of the eligibility criteria but could form part of an overall assessment of an applicant's suitability for the service.

As well as other door-to-door schemes we also looked at eligibility criteria for the Blue Badge Scheme. This is a scheme that offers parking concessions to disabled people to assist them to park close to their destination. There are around 100,000 Blue Badge Holders in Northern Ireland. Applicants automatically qualify for the Badge if they receive Higher Rate Mobility Component of DLA or War Disabled Pensioner Mobility Supplement or if registered blind. In addition to the automatic criteria the Blue Badge can also be issued on a discretionary basis based on evidence provided by the applicant around their ability to walk distances. The applicant is required to provide contact details for their doctor. The Badge is renewed every three years.

Based on comparison with other schemes the current eligibility criteria for the door2door scheme is similar to many other schemes.

Analysis of evidence

Clearly there are a number of different options for eligibility for door2door services. Criteria based solely around receipt of benefits or age is one option. Benefit criteria are a relatively straightforward way of identifying disabled people who could also make use of a service such as door2door. As applicants only have to prove receipt of the benefit it is relatively easy to administer. In

Northern Ireland proof of qualification is sought from the relevant statutory agency by DRD.

Benefit/age related criteria do have drawbacks. It is difficult to match benefits directly to an individual's need for a service such as door- to-door in that they find it difficult or impossible to use public transport. For example some disabled people may need door to door but only receive Lower Rate Mobility Component of Disability Living Allowance and not qualify for the service. Conversely someone may be in receipt of a benefit that qualifies for door to door but may have no problems accessing mainstream public transport. Benefit/age related criteria are a blunt tool in targeting the service. The inflexible nature of a benefit linked eligibility criteria is perhaps illustrated best in the current scheme by the significant number of people who have gained access to the service for "other reasons" outside the set eligibility criteria.

One way that schemes can be broadened is to add discretionary criteria in addition to the benefit or age related criteria. This usually involves the applicant providing their own evidence of the need for the service which can be verified by an independent referee usually the applicants GP. Discretionary criteria means the applicant does have to provide more information about what makes using public transport difficult. However unlike the benefit based criteria a judgement needs to be made whether the person should be able to use the service. In the case of Northern Ireland all applicants under the discretionary criteria must have the application supported by their doctor. Whilst this provides a degree of certainty that the applicant has a disability it is debateable whether in all cases the doctor has the knowledge to certify that the individual finds it difficult or impossible to use public transport. For example a doctor is unlikely to have detailed knowledge of modern accessibility standards for buses or which services operate where an applicant lives.

The final way eligibility can be set is to allow applicants to self-certify, providing their own evidence of the difficulty they have using public transport. Usually, but not always, applicants are required to provide their doctors details which are used if there is a query over the eligibility. Sometimes applicants can provide proof of receipt of benefits as further evidence of their need for the service.

By asking applicants to explain their difficulties using public transport it can be argued that self-certification is the best way to target the service. An additional consequence of self-certification is a wealth of qualitative data on the barriers that make using transport difficult for disabled people which could shape wider policies around improving access to transport for disabled people and older people. For example if a substantial number of applicants cite a lack of confidence as a reason for not using public transport policy makers could look at travel training/support measures to address this barrier. Similarly if people cite not being able to get on or off buses as a reason for not using buses this may indicate a low-awareness of the accessibility of services in an area and the need for better, targeted information. In the longer term this information is invaluable in reducing demand for a service such as door2door by maximising the use of public transport and ensuring the service is targeted at those that need it most.

The main drawbacks of self-certification are that it requires those administering the scheme to have the knowledge and skills to make judgements about an applicant. It could also be argued that applicants could provide inaccurate information on their applications to gain access to the service. Clearly this is a danger but must be balanced against the fact that none of the options for eligibility guarantee only people who find difficult or impossible to use public transport can use the service. Additional checks and balances within the application process can help reduce the potential for inappropriate applications.

Recommendations

Recommendation one: Revise current eligibility criteria making self-certification the main criteria

Based on our analysis of the different options for eligibility criteria our key recommendation is that in future benefit/age criteria should not automatically qualify people for door2door transport. Instead all applicants should be required to provide evidence of the difficulties they have accessing public transport. We believe this option is the most appropriate in ensuring that only people who have difficulties accessing public transport can use the service.

We do not believe that receipt of benefits should be disregarded altogether. Imtac recommends that applicants have the option of

indicating receipt of certain benefits as a way of providing further evidence of the need to use the service.

Imtac also believes that information provided about applicants impairments in other sections of the application should be considered in assessing suitability for the service. For example if an applicant indicates they are a wheelchair user, whose chair is too big to travel on public transport and who is in receipt of Higher Rate Mobility component of DLA Imtac would believe this to be clear evidence of the persons suitability for membership of the service.

Imtac recommend that the all applicants be asked to provide contact details for their doctor. Queries should only be undertaken with a doctor if concerns are raised about an individual's suitability for the scheme.

Recommendation two: Make the application straightforward

Many people find filling in forms difficult and being asked to provide evidence of need could make the application process more arduous than it is currently. In making the change to self-certification it is important to ensure that the applicants can easily identify the difficulties they have using public transport. For example rather than ask people to provide the evidence in their own words applicants could be asked to indicate which barriers prevent them using public transport from a series of options. Application packs must also be made available in formats accessible to the applicant. Imtac can assist the Department in any revision of application packs.

Recommendation three: Introduce an Appeals Procedure

In most cases decisions about application should be straightforward. However there may be occasions when refusal of an application is disputed. For this reason Imtac recommends the Department introduce an appeals procedure for people who are refused access to the service. The Committee believe this is essential for any process where a subjective decision is being taken. We believe that an appeals procedure is also required under the current eligibility criteria as we are aware of some cases where disabled people have been refused membership of the service because their doctor has not supported the application.

Imtac can assist the Department in developing an appeals procedure. As with the application process steps must also be taken to ensure the appeals procedure is accessible.

Recommendation four: Introduce a periodic renewal system for membership

Imtac believes there is merit in introducing a time limit on membership of door2door and asking members to renew their membership. The Committee believes a membership period of three years would be preferable and is used by similar schemes such as the Blue Badge Scheme.

Renewing membership would have a number of benefits. Firstly it would allow any new eligibility criteria to be introduced over time and ensure all members meet the criteria. Secondly it would ensure that membership database is accurate by removing members who no longer want to use the service or who have died.

Recommendation five: Ensure staff assessing applications have the appropriate knowledge and expertise

Imtac does not believe that assessing applications for door2door membership is a difficult or complex process. It does not require staff involved to have medical knowledge but does require them to have an understanding of who disabled people are and the barriers that make using transport difficult. For this reason Imtac recommends that staff involved making decisions about door2door membership undertake Disability Equality Training delivered by an experienced disabled trainer. The DET should be tailored to give staff an understanding of how barriers in the built environment and the design of transport services can make using transport difficult or impossible for disabled people. Imtac can assist the Department in devising a suitable training course.

Recommendation six: Utilise evidence provided by the changes to improve wider services and policies

One of the major benefits of changing the current criteria is the information it will give the Department about the barriers that make using public transport difficult. Imtac recommends that this evidence be periodically reviewed to ascertain what the main barriers are. The Committee further recommend that using this

evidence the Department identify actions that will reduce the impact of these barriers. These actions should be targeted at increasing the use of mainstream public transport by disabled people and older people whilst reducing usage of door2door services thereby ensuring the service is available to people who need it most. This will enable the Department to meet the existing policy commitments made in the Accessible Transport Strategy at the same time as starting to address the historic low usage of public transport by disabled people.

Conclusion

Imtac welcomes the opportunity to comment on current eligibility criteria for door2door services in Northern Ireland. We believe our recommendations would have the following benefits:

1. A better targeting of the service to people who find difficult or impossible to use public transport
2. A better understanding of why people need the service
3. Better informed policy to encourage more disabled people to use mainstream public transport
4. Resource savings in terms of the bureaucracy currently involved in checking eligibility

We hope the Department find our recommendations useful and look forward to discussing our proposals in more detail

Contact us

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