



Comments from Imtac on the Equality Impact Assessment on the Department's arrangements for the purchase of rail tickets using the half fare smartpass

February 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 EQIA

- 4 Imtac is disappointed that the EQIA appears to be poorly informed, particularly in relation to the background to the issue of return ticketing. One issue members want to specifically clarify relates to paragraph 3.11 where reference is made to the Omnibus Partnership as “a constituent member of Imtac.” We would like to make clear that Imtac is constituted of individuals not organisations. Our members are required to represent the best interests of all disabled people and older people not their own organisations. There are many organisations of and for disabled people and older people that do an excellent job in promoting people’s rights. The Department should not attempt to diminish either the status and work of independent organisations or its own advisory Committee by including misinformation in documents. By way of further illustration paragraph 3.7 includes reference to an issue that arose around the purchase of rail tickets on-board trains. It is implied that Imtac raised this issue. It was, however, raised by the Omnibus Partnership who through the hard work of their members secured a change in Translink policy to allow the purchase of tickets on-board trains. Imtac was not involved in either the complaint or securing the change in policy.

- 5 Imtac welcomes the opportunity to comment on the current EQIA on ticketing arrangements and the half fare smartpass. The issue of return ticketing and concessionary fares has been raised consistently with Imtac by older people, disabled people and their organisations. As required by the Department's own Accessible Transport Strategy Imtac has reflected this issue in our advice to the Department for some time. This includes asking the Department to look at providing return ticketing as part of the Review of the Concessionary Fares Scheme undertaken in 2006/2007¹. Interestingly we also advised the Department to undertake qualitative research with users of scheme as part of the Review to identify the impact of the Scheme and potential improvements. The Department decided not to do this opting instead to use only quantitative data around usage of the scheme in the Review. It is therefore frustrating that in the EQIA the Department cite a lack of qualitative evidence from users of any impact as a reason for not progressing the issue of return ticketing.
- 6 Subsequent to the issue being raised Imtac was informed of changes to allow return ticketing for Smartpass users on rail journeys only in a meeting on 19th March 2009. It was only after this meeting that members discovered that the return concession only applied to holders of the Half Fare smartpass. Whilst welcoming the changes made Imtac did write to the Department in June 2009 asking that the concession be extended to all disabled people and older people who hold a smartpass.
- 7 It is important to understand why we asked for these changes. Many disabled people find queuing at stations difficult and uncomfortable. People who use a smartpass had suggested to us that having to buy a ticket for every stage of a journey made travelling more difficult and that if a return element could be obtained at the start of a journey this would make travelling much easier.

¹ Included in an Issues Paper submitted to DRD in September 2006 available on our website

- 8 The Committee felt that making this change would be a practical way the DRD could adjust a current policy to make transport more accessible to disabled people. As such the proposal fitted perfectly into the positive commitments made by the Department in the Accessible Transport Strategy 2005. As the ATS makes clear there is a strong correlation between age and disability and research shows that the majority of disabled people are aged over 60. Given this fact our advice makes clear that any introduction of return ticketing would have include all older people eligible for the Senior Smartpass. Interestingly the Department did not use the Accessible Transport Strategy as part of the available data and research when assessing the impact of the current policy.
- 9 One of the issues that has arisen during the debate around return ticketing has been the usefulness of arrangements for bus travel. Imtac recognises that on many Metro and town services there is no need for return ticketing due to the “hop on –hop off” nature of the service. However there are some Goldline services for which passengers must purchase tickets prior to boarding the coach. Disabled and older passengers have also told us that sometimes long queues develop for long distance Ulsterbus and Goldline services. Many of these passengers tell us that rather than queue for the services they would find it easier to buy a return ticket at the kiosk. Imtac has always recognised that return ticketing would be particularly beneficial for journeys made by train.
- 10 Imtac welcomes the Departments decision to undertake the full EQIA on the current policy. We agree with and endorse the main finding of the assessment that the current policy on returning ticketing impacts negatively on disabled people and older people. We cannot comment on detail on the other impacts identified by the EQIA but would suggest that the impacts broadly reflect the demography of areas where the public transport system is better in Northern Ireland.

- 11 Having identified the clear negative impact on disabled people and older people it is disappointing that the Department has indicated no measures can be introduced to mitigate against the impact. The issue of potential fraud is used as a justification to do nothing.
- 12 Imtac has a number of queries about what evidence there is to indicate that return ticketing will lead to greater potential for fraud. In relation to the concession being used by someone not entitled, currently all passengers need to purchase or show a ticket to a member of Translink staff to gain access to a bus or train. Regardless of whether tickets are issued on a single or return basis, the risk of fraud only increases if the appropriate checks are not made by staff. In finalising the EQIA Imtac recommends that the Department provide more detail on the weaknesses in the current system that would allow such fraud to take place.
- 13 The second area of concern expressed by the Department's audit advice is the potential for people to obtain a return ticket but not use the return element of the journey. There appears to be no clear logic to this argument. Why would anyone buy a return ticket with the express intention of not making the return element? Using the same logic would it not also be possible for a person to buy a ticket for a single journey and simply not travel? Obviously there may be occasions where a person, through circumstance, cannot make the return part of a journey but the risk of this happening on a regular basis is minimal.
- 14 The Department openly recognises in the EQIA that the current policy does not treat all disabled people in equitable manner. Imtac has raised question marks over the Departments justification for doing this. Given this we would advise the Department to reconsider the decision not to extend the facility to obtain return tickets to all disabled people who use the Concessionary Fares Scheme. This would include older people aged 60 and above, people who are registered blind and people in receipt of the War Disabled Pension.

In addition we recommend that the Department allow this facility to be used for both rail and bus journeys, recognising that the number of bus services where the concession will be used is relatively small.

- 15 Imtac also recommends that the Department considers extending the current scheme to allow Half-Fare Smartpass holders to obtain the concession on the price of the return fare of the ticket rather than the price of two single journeys. We understand that under current Budget proposals reimbursement for Concessionary Fares will be capped so such a change does not incur additional costs for Government. The change will make travel less expensive for the disabled people who use the path and will, we believe, encourage more disabled people to use public transport. Currently discounts offered by Translink, particularly around off-peak, return bus and rail tickets mean that savings using the Half Fare Smartpass are minimal.

Conclusion

- 16 Imtac would like to thank the Department for undertaking the current EQIA. We believe the EQIA clearly demonstrates that the current arrangements do not provide equality of opportunity for all disabled people (particularly people aged over 60, people who are registered as blind and people in receipt of War Disabled Pension). The Committee does not believe the justification for not extending the concession to all disabled people affected is valid. We therefore advise that the Department amend the policy to include the affected Groups. We also ask that the policy also be extended to include bus travel. In addition we recommend that the Department look at allowing Half-fare Smartpass holders to obtain a concession on a return fare rather than the current concession on single fare journeys

Contact us

- 17 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**