

Comments from Imtac on the consultation on Taxi Fare and Taximeter Regulations

February 2012

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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.

Comments on the proposals for taxi fare and taximeter regulations

Research shows that disabled people and older people rely more on taxis than others in society for getting around. The cost of taxis is a major issue for many older people and disabled people and we have provided evidence of discriminatory practices amongst some operators during the review of taxi regulation in Northern Ireland and the subsequent passage of the Taxis Act.

Imtac is supportive of the proposals for a maximum fare for all taxis in Northern Ireland. We believe that this regulation will remove the most blatant cases of discriminatory charging experienced by disabled people such as the excessive premiums paid by wheelchair users for many accessible taxis.

The Committee is also supportive of the proposals for taximeters. We believe that taximeters are essential to ensure public confidence in the regulation of fares. Imtac supports the Departments proposals for taximeters as detailed in the consultation. It is of particular importance that taximeters have the ability to generate receipts.

Imtac does have a number of concerns, queries and suggestions we would like to raise.

With regard to tariffs we recognise the need for unsocial tariffs. However we do have some concerns about the times indicated in the consultation where these tariffs will apply – from 8pm to 6am Monday to Friday and all weekend. We would like the Department to provide us with more information about how these timings were decided including evidence that demand for services are low at these times and comparison with other places where fare regulation is in place.

The Committee notes there is provision for additional charges within the tariff proposals. We would like the regulation to ensure additional charges are not used to add to the costs of taxis for disabled people and older people. In particular we would like the regulation to make clear that the soiling charge cannot be applied in relation to the carriage of guide dogs or other assistance animals. On a similar issue the consultation does not make any reference to additional charges for the carriage of luggage. Regulation should make clear that it is not acceptable for taxi drivers or operators to make additional charges for the carriage of mobility aids and equipment.

With regard to taximeters we support the proposals for the issuing of receipts. However we note that it is not explicitly proposed to provide details of drivers on the printed receipts. Imtac recommends that all receipts include a method by which drivers can be identified, mirroring for example information currently provided on bus tickets here.

Imtac welcomes the proposals to require all taxis to display a fares board in the passenger compartment. We recommend that the Department specify the design of this board to ensure information is accessible to the broadest range of passengers. In addition we recommend that operators be made aware of how to provide information about fares in other formats if requested by passengers. Imtac is happy to assist the Department in any way around design issues.

Some of these issues could potentially fall under the provisions of the Disability Discrimination Act and the Disability Discrimination Order. Imtac believes that it is essential that the Department is pro-active in requiring operators and drivers to meet the provisions of equality legislation. We believe it is important that where it is possible to be prescriptive about potential discrimination this should be included in regulation. One area where this may not be possible is around proposals for passengers to negotiate a lower

fare. Imtac does have concerns that disabled people may not have the same opportunities as non-disabled people to avail of this option. We would ask that the Department to work with the Equality Commission to ensure that disabled people know their rights with regard to using taxis and that operators are aware that they are legally obliged to ensure disabled people enjoy the same level of service as non-disabled people.

On a final issue the Committee notes that no Equality Impact Assessment has taken place on the proposals. Whilst we acknowledge there was a comprehensive EQIA was undertaken on the Taxis Bill consultation it is important that assessments also take place on the detail of proposals around the provisions of the Act.

Conclusion

Imtac would like to thank the Department for the opportunity to comment on the proposals. The Committee is broadly supportive of the proposals for taxi fares and fare regulation. We have raised a number of concerns and made some suggestions and would welcome the opportunity to work with the Department and others to address these.