



Comments from Imtac on proposals for Taxi Operator Licensing

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 proposals

- 4 Imtac is disappointed that the consultation period is only 8 weeks which included the Christmas holidays. In future we would recommend that the Department allow 12 weeks for consultation and allow additional time to take into account significant holiday periods.
- 5 The Committee was a significant stakeholder during the development of the Taxis Act 2008. We assisted the Department consult directly with disabled people and older people during the development of proposals and gave evidence to the Environment Committee supporting the provisions of the Taxis Bill.
- 6 It is not our intention to respond to all the questions contained in the consultation document. Imtac is supportive of Operator Licensing as we agree with the Department that Licensing will mean better services for users of services. We are broadly supportive of the proposals for licensing set out in the consultation.
- 7 Imtac does have two main concerns with regard to the proposals. The first is the failure by the Department to link Operator Licensing to proposals to improving the accessibility of taxi services to disabled people and older people. The second is a concern about resources available to the Department to enforce any new arrangements.

- 8 Improving accessibility to taxi services was a key driver for the Department when reviewing the regulation of taxi services here. Improving accessibility was also one of the key priorities identified by the Environment Committee in its report into the Taxis Bill. During discussions with the Department and Imtac it was agreed that there were major benefits in linking improvements in accessibility to proposals for Operator Licensing. It is disappointing that current proposals do not make this linkage.
- 9 One of the agreed areas where Operator Licensing could improve access was to ensure that in future Operators provide a percentage of accessible vehicles. By doing so we could start to address the current low number of vehicles accessible to disabled people and wheelchair users in particular. Imtac is aware that work by the Department for Transport has failed to provide regulation around an agreed accessible design for taxis. We are also aware that the Department here will bring forward its own proposals for improving access to vehicles. Despite these issues we believe that the Department must include in future regulations for Operator Licensing provision for increasing the number of accessible taxi services, even if these provisions will only be phased in when agreement is reached on the design of accessible taxis.
- 10 There are additional accessibility measures that can be linked to operator licensing. These include the provision of information about services. For example an operator could be required to provide an text messaging service for users making the service more accessible to people who are deaf or hard of hearing. Other issues that can be linked to Operator Licensing could include depot accessibility and staff training. Imtac believes there is a good case to link many of the requirements of Operator Licensing to the requirements of the Disability Discrimination Act (1995) and the Disability Discrimination (Transport Vehicles) Regulations (Northern Ireland) 2010. The Committee feels there is also potential to incentivise accessibility

improvements through discounted license fees. We would welcome the chance to discuss these issues with officials from the Department at the earliest opportunity.

- 11 The second concern the Committee is related to the resources available to the Department to enforce the new arrangements. The proposals outlined in the consultation will involve significant resource implications for current operators both in terms of the fees involved but also the increased record keeping required by the licensing regime. Imtac is aware that existing taxi enforcement is under resourced and could not possibly cope with the proposed new arrangements. We are concerned that without significant investment in enforcement the potential exists for people to operator illegally, outside the licensing arrangements. This will not only disadvantage users in terms of safety it will also significantly disadvantage genuine operators who seek to meet the licensing requirements. Given the current financial climate Imtac would like assurances from the Department that the necessary resources will be available to enforce Operator Licensing.

Conclusion

- 12 Imtac would like to thank the Department for the opportunity to contribute to the current consultation. Broadly speaking the Committee is supportive of proposals for Operator Licensing. We do however feel that any future regulations for such Licensing must contain strong measures to link Licensing to improving the accessibility of services to older people and disabled people. Imtac would welcome the opportunity to discuss with officials from the Department how this can be achieved.

Contact us

- 13 If you have a query about this document or would like it in another format you can contact us at:

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