



**Comments from Imtac regarding consultation  
on future arrangements for consumer  
representation in Northern Ireland**

**January 2014**

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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](http://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.

If you would like this publication in any of the formats listed above or if you have any other information requirements please contact:

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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.

## **Current arrangements for Consumer representation in Northern Ireland**

As an advisory Committee with a specific remit relating to transport Imtac feels it appropriate only to comment on current arrangements as they relate to transportation services.

In relation to transport services Imtac believes that the Consumer Council currently provide effective representation in terms of advice, complaints handling and representation on consumer issues. The Consumer Council has taken specific measures to reach out to older people and disabled people and have effectively resolved complaints from individuals with a disability. From a broader perspective the Consumer Council has worked closely with organisations of and for disabled people such as Imtac and issues for disabled people and older people are included in the wider policy work undertaken by the Consumer Council around transport.

Of particular importance to Imtac is the complaints handling role undertaken by the Consumer Council around EU passenger rights when travelling by air and sea. Significant credit should be given to the Consumer Council in efforts made to inform disabled people and older people of their rights in these areas and their work with

operators of services. Recognition should also be given to the willingness of the Consumer Council to work in partnership with others on this including Imtac.

One final point is important in relation to current arrangements. A number of disabled people and older people have spent time as members of the Council over the years. The Consumer Council therefore has been more successful in promoting the participation of disabled people in public life than many other public bodies where representation by disabled people is at a very low level.

### **Future Consumer representation arrangements in Northern Ireland**

Imtac believes that it is not in the interests of consumers to have multiple organisations representing consumer issues in Northern Ireland. We believe this leads to confusion and frustration amongst consumers. The Committee therefore supports a single consumer representation body for Northern Ireland.

In relation to the most appropriate model Imtac believes any body needs to be appropriately resourced, must be transparent and accountable. As an independent advisory body funded by Government Imtac disputes any implication in the consultation that such bodies cannot be independent. We have found no evidence in the papers that accompany the current consultation of examples of where the Consumer Councils independence has been compromised. Finally specifically in relation to transport there is no other current body in Northern Ireland that could effectively undertake the current transport remit of the Consumer Council. Imtac views the suggestion from the consultant that the remit potentially transfer to Transport NI as unacceptable.

Based on the above Imtac strongly supports the option of a continuation of the current Consumer Council model of an Executive Arms Length Body.

## **Impact Assessments**

As previously indicated the Consumer Council has a good track record in engaging and working with disabled people, older people and their organisations. Also as previously indicated the Council has been proactive in recruiting disabled people as members of the Council and therefore promoting opportunities for participation by disabled people in public life. It is disappointing that the impact assessment has not given appropriate weight to these issues and in particular the lack of information about how alternative options will ensure this engagement and participation continues is a major omission. Given the absence of detailed information around these issues Imtac believes the conclusion that each option has no significant implications on any of the Section 75 groups is questionable.

## **Conclusion**

Imtac would like to thank the Department for the opportunity to contribute to the current consultation. The Committee strongly supports the option to retain current arrangements for the Consumer Council as an Executive Arms Length Body.