



**Comments from Imtac on the consultation on the
draft Programme for Government, Investment
Strategy and associated EQIA**

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.

General comments

Imtac welcomes the opportunity to comment on the draft Programme for Government and Investment Strategy. The Committee is disappointed that the associated Equality Impact Assessment for the consultation was published six weeks into the consultation process. Government should ensure that in the future EQIA's are available as and when consultation documents are published.

The Committee fully recognises the unprecedented economic circumstances that the Northern Ireland Government faces at this time and we appreciate that cuts to services are inevitable. Imtac welcomes the commitment in the draft PfG to protect the most vulnerable in our society from these cuts. The Committee also welcomes the overall commitment towards reducing inequality in our society.

Many of the commitments contained in the draft PfG have the potential to make things better for disabled people and older peopleⁱ. Imtac particularly welcome specific commitments on issues that are important to older people such as measures to tackle fuel poverty, crime and fear of crime. However the generic nature of commitments and the lack of overall detail make it difficult to provide a more fulsome endorsement of the PfG.

Imtac is particularly concerned that the draft PfG does not contain specific commitments to improve the life chances of disabled people. The EQIA makes clear that disabled people represent a significant proportion of our society and that evidence shows disabled people are less likely than others to be in employment and more likely to live in poverty. Successive administrations here have failed to address these

issues and this situation is likely to worsen over the next few years. For instance the Westminster Government proposals for Welfare Reform will result in many disabled people receiving less in benefitsⁱⁱ with little evidence that their employment opportunities will improve. It is clear to Imtac that there is an onus on the Northern Ireland Executive to do more in the Programme of Government to explicitly recognise the difficulties faced by disabled people. This could be demonstrated with commitments to ensure training, employment and other opportunities for disabled people are improved.

Imtac welcomes the proposals to extend age discrimination legislation for older people to cover goods, facilities and services. However the Executive should recognise that since the introduction of the Equalities Act in Great Britain in 2010 disabled people and older people have stronger rights there than exist in Northern Ireland. Imtac does not believe this disparity in rights between here and other parts of these islands supports the Executives wider commitments on equality. The Committee recommends that the Programme for Government should include a commitment to address this equality deficit.

Comments on the transport elements of the draft PfG/Investment Strategy

It is now accepted that older people and disabled people are disadvantaged more than others in society because of a lack of access to suitable transportⁱⁱⁱ. Poor access to transport means many disabled people and older people find it difficult to do everyday activities and access key services. Research shows that transport or lack of it is a major contributor to social exclusion and inequality in our community^{iv}.

Imtac recognises and welcomes the investment made in transport services by Government in Northern Ireland over the last decade aimed at improving access to transport services for disabled people and older people. However our analysis indicates that disabled people and older people still experience many barriers to travel^v.

Imtac welcomes the commitment to spend £500 million over the period on sustainable transport measures. Looking at proposals for how this resource is to be allocated^{vi} we welcome further capital investment in better and more accessible bus and rail services in Northern Ireland.

Imtac is concerned about proposals for to reduce revenue support for public transport services over the same period^{vii}. Proposed reductions in

the subsidy provided by DRD as well as reductions in the transport services provided by both Education and Health will inevitably result in reductions in public transport service levels over the next few years particularly in rural areas of Northern Ireland. It will also place an unrealistic burden on services such as Door2door transport and rural Dial-a-lift and further isolate sections of the community.

Based on a simple analysis of the public transport elements of the PfG Imtac believes that reductions in service levels will significantly reduce the ability of many in our society to travel. This will have a significant impact on the broader commitments in the draft PfG around tackling inequality and impact on a number of specific commitments in the Programme aimed at tackling this issue^{viii}.

The EQIA on the PfG recognises that the reduction in subsidy will have an impact on older people and disabled people. However the document does not acknowledge that savings to education transport budget will magnify the impact of these reductions nor does it propose measures to mitigate this impact. It is disappointing that Government here indicates that responsibility for introducing mitigating measures to compensate for the reduction of subsidy lies with Translink.

The Committee recommends that the final EQIA include measures that mitigate the impact of cuts. Imtac acknowledges that given the financial situation there is limited room for manoeuvre but the PfG should acknowledge that older people, disabled people and others on lower incomes have fewer alternatives for travel than others in our society . However the Committee notes that the draft PfG recognises the need for cross departmental/agency working. Imtac believes that with regard to transport there are three areas where cross departmental working could make the best use of the resources we have and contribute to mitigation against the reduction in services elsewhere. These are:

- A Demand Responsive Transport Forum to look at the potential of developing more flexible transport solutions within current resources
- A Travel Training Forum to look at how existing resources could be used to extend support services to enable people to use transport
- Improved and better co-ordinated information about travel services

Imtac would also like to see a further commitment included in the draft Programme for Government that would improve access to public transport services for many older people and disabled people. The DRD recently completed a pilot of an audiovisual information system on a bus route in Belfast. Whilst we acknowledge that it is likely that resources will not be available to extend this pilot across the complete bus fleet and network we do believe that Government here could legislate to amend the Public Service Vehicle Accessibility Regulations to ensure that all new buses introduced in Northern Ireland include this facility.

One final issue we recommend the Executive to consider is the issue of free travel for disabled people on public transport. Imtac recognises that limited resources currently make introducing such a measure unlikely in the short term as transport operators continue to be reimbursed for actual usage of smartpasses. However the DRD Savings Plan indicates that the DRD may seek to reduce this level of subsidy in the future regardless of the number of passengers using the pass. If this proposal is progressed we would like the Executive to consider making travel on public transport free for eligible disabled people who currently have half-fare concessions^{ix}.

Conclusion

Imtac welcomes the opportunity to comment on the draft Programme for Government and Investment Strategy. We hope the comments we have provided are constructive and helpful. The Committee would welcome the opportunity to provide further details on any of the issues we have raised if required.

ⁱ Commitments include:

- provide £40 million to address dereliction and promote investment in the physical regeneration of deprived areas through the Social Investment Fund;
- invest £40 million to improve pathways to employment, tackle systemic issues linked to deprivation and increase community services through the Social Investment Fund;
- implement a strategy for integrated and affordable childcare;

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- deliver a range of measures to tackle poverty and social exclusion;
 - ensure that at least one year of pre-school education is available to every family that wants it;
 - ensure all children have the opportunity to participate in shared education programmes and substantially increase the number of schools sharing facilities;
 - reform and modernise the delivery of Health and Social care to improve the provision and quality of services;
 - reconfigure our network of health and social care services to improve patient outcomes and access to new treatments;
 - bring forward a £13 million package to tackle rural poverty and isolation in the next 3 years
 - upskill the working age population by delivering over 200,000 qualifications;
 - support people (with an emphasis on young people) into employment by providing skills and training

ⁱⁱ Under the proposals many disabled people will be placed on time limited Employment Support Allowance. The proposals to replace Disability Living Allowance with Personal Independence Payments indicate a reduction of 20% of overall claimants.

ⁱⁱⁱ Detailed analysis of these issues is contained in the Accessible Transport Strategy produced by the DRD in 2005.

^{iv} The best analysis of the linkage between transport and social exclusion is contained in Making the Connections: Final Report on Transport and Social Exclusion (SIU 2003).

^v This assessment is based on our discussions with disabled people and older people and their organisations as well as an analysis of statistical evidence including the Policy Review of the Concessionary Fares Scheme, the Report on Promoting Social Inclusion Group on Disability and the DRD Audit of Inequalities.

^{vi} Ministerial response to written assembly question AQW 5048/11-15

^{vii} Contained DRD Savings Plan published earlier this year

^{viii} See i above

^{ix}The DRD has accepted that anomaly exists between concessions for disabled here and other parts of these islands where free travel is available. A lack of resource has prevented this anomaly being addressed. If the funding mechanism for concessionary fares is altered resources may not be an issue. The ATS identified the cost of travel as one of the barriers that prevent disabled people from travelling.