

From: G.MAX O'BRIEN
Sent: 08 July 2009 00:14
To: ATS Info
Subject: TRIM: DRD Disability Action Plan

Janet

Apologies for the lateness of this submission which I have not had time to check. If you need any clarification please let me know and I will arrange to discuss.

These are my views on the above document:

- **Future Action plans should record the changes that have been implemented or underway and include the organisations that made representation on behalf of older or disabled people;**
- **There should be an honest statement on the financial resources that have been allocated and used over the previous three years and the proposed expenditure in the coming two years;**
- **There needs to be an explanation of where (viz., Canada, America, Australia, New Zealand, Scandinavian or other European country) the DRD obtains it's "up-to-date- best practice from;**
- **The report should contain a schedule of DRD meetings, past or proposed, with organisations representing older and other disability organisations;**
- **do the Strategic Objectives (SO1 to SO7) adequately cover the future implementation of Part III of the Disability Discrimination Act 1995 which is out for consultation at present?**

Strategic Objective One

GENERAL - identify the issues being implemented in partnership with key stakeholders that appear not to have been progressed effectively and which are presently detrimental to older and disabled people.

- **PO1A01 I believe that whilst the DRD may claim that legislative changes in GB have been implemented in parallel they have not been implemented at the same time.**

- ***PO1A03 Using words such as "interoperability" in Action Plans is not helpful to the understanding of the proposals by those people in the sector.***
- ***P01A04 It is essential that those involved from both the private and public sector in implementing the campaign at all levels require detailed training from older and disabled people before the process is commenced.***
- ***PO3A01 MIU and PPTD must address the long outstanding transport barriers that have proved difficult to consider or to implement.***
- ***P03A03 I believe that the Officers of IMTAC should take the opportunity to make this submission to the Minister at a small formal occasion. At the same time there should be a Press Release and photograph of those attending issued to the media to improve the communication of the information to those in the sector.***
- ***P05 Whilst it is beneficial to know what other bodies are implementing, the Department should not slavishly follow other jurisdictions.***
- ***P06 There does not seem to be provision here to involve those people with a disability who have a living experience of disability and/or being older and who may also be involved in the delivery of training to others.***
- ***P07 Whilst it is understandable at the present time for the Department to highlight 'affordability' and the number who will benefit it must be remembered that this number are already a minority in society.***
- ***P08 There is a need to ensure a high level of training (by disabled and older people) if such research is going to be beneficial. There needs to be a discussion on the research priorities which should cover the province.***
- ***P09 The Department needs to consider how it can more effectively distribute all the changes and improvements to individual disabled and older people who are not members of organisations and who lack human contact.***

Strategic Objective Two

- ***It seems to me that this SOP10 is asking the appropriate Service Providers to simply keep to the law that is already on the statute books since 1995 and to make it look as if this is part of the Department's annual workplan.***

Have they become the Disability Implementation and Enforcement Department (viz DIED)

Strategic Objective Three

- ***This SO appears to me to lay down the main work for the Department.***
- ***The Department should provide information and explanation on those issues that have been slow to be implemented.***
- ***I also see that there is an intention to carry out a number of reviews under this SO is there an understanding of the pressure that voluntary organisations are in at present and how they can cope with a lot of changing and delayed circumstances.***

Strategic Objective Four

- ***S04P22 has omitted to include the word "accessible" and therefore is of no relevance to disabled people outside the three areas offered to the sector. Am I right that this provision has been withdrawn?***
- ***S04P23 is dangerous for older drivers to have their licences challenged and then withdrawn from them. There is little knowledge of the criteria of the review undertaken on behalf of the DVLA when a person licence application is flagged for OHS involvement.***
- ***Secondly under this IMTAC should engage with t***
- ***The DVLA should ensure that any driving assessment should be done in the person's own environment and that they should not be asked to take the test in a strange driving environment.***

Strategic Objective Five

- ***SO5P24 needs to be widened to include the DVLA on the "attitudinal and psychological barriers" when considering approving re/new of an individuals driving licence.***
- ***SO5P24 should also include the area of research and a NI University should be engaged on the project.***
- ***SO5P26 unless a decision is taken on the level of clamping vehicles 'parking illegally' in private and public car parks there will be no great advancement in removing this unacceptable action.***

- ***under SO5P26 consideration should be given to issuing Blue Badges for a one off 12 month period and should have a colour code on the badge to distinguish one year from another.***

Strategic Objective Six

- ***SO6P27 should include a serious look at what technology is available in GB, Europe and world wide that does not require the reinventing of the wheel and could drastically shorten the timescale for implementation.***

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