

The Omnibus Partnership

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This document is available, on request, in alternative formats, including CD ROM and Easy Read. Also, we welcome any response you make to it in the format which suits you best.

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Janet Watson

MIU Regional Planning & Transportation Division DRD

Room 3-01 Clarence Court 10-18 Adelaide Street Belfast BT2 8GB

Response to DRD Consultation on:

Accessible Transport Strategy Draft Action Plan 2009-2012

Introduction

The Omnibus Partnership is an organisation of disabled people. We work to ensure that, together with other disabled people, we are enabled to live independent lives and are socially included. As disabled people, we will be amongst those affected, directly, by the Consultation and its subsequent implementation; so, we welcome this opportunity to respond. Our response is the culmination of discussions with our Members, together with other disabled people, here, in Northern Ireland.

**An organisation of disabled people
working for our inclusion in our society**



Information and Communication

The Omnibus Partnership commends and thanks DRD for advertising the availability of and responding, promptly, to our request for a range of alternative formats of the Consultation.

We recommend, though, that the availability of alternative formats be highlighted, on the front page, and, since it might not be easy or possible for some disabled people and, even, their organisations, to reply “in writing”, that an additional statement be included, to the effect that DRD accepts responses in alternative formats, also.

We recommend, too, that DRD includes, with its contact information, an SMS number, for use by, especially younger, deaf people.

The Omnibus Partnership commends and thanks DRD for including positive images of disabled people on the document.

Question 1

Since the launch of the Accessible Transport Strategy in 2005 do you think the accessibility of the transport system for disabled people and older people has improved?

The Omnibus Partnership notes that the question is stereotypical: lumping all disabled people, demographics and transport modes together, as one; as if it were that simple.

Consequently, the answer to the question cannot be a straight “yes” or “no”: it depends.

The Omnibus Partnership notes, moreover, that the question is presumptuous: implying that any improvements in access, to the transport system, for disabled people and older people, are due, only as a result of the Accessible Transport Strategy; not so.



Question 2

Can you say why?

The Omnibus Partnership commends the Department, per se, for the substantial amount of funding it has committed and will be committing, to ensure that all public buses and trains, here, in Northern Ireland, meet current accessibility standards, by 2012.

That being said, current accessibility standards do not include audiovisual systems, on public buses. So, whilst a significant number of wheelchair users and people with other mobility impairments are able, nowadays, to access public buses, people who are deaf, deafened, hard of hearing, blind or partially sighted, or who have a speech impairment or a learning difficulty cannot and, generally, do not do so, because of concerns or actual experiences of being left off at the wrong stops: a circumstance, which might not just be disconcerting but also dangerous. Moreover, public buses, unlike trains, here, are not accessible to all wheelchair users, especially powered wheelchair users.

Nor do door to door services, in urban areas, nor community transport services, in rural areas, alleviate such discrimination: they are never as readily available as public bus services and the vehicles are not designed to accommodate all and, consequently, not fit for the purpose of transporting disabled people and older people, who public bus and train services are not accessible to.

The Omnibus Partnership notes, moreover, that the previous Action Plan is accredited with the “start of a consultation process to introduce legislation to extend part III of the DDA to Transport services in N.Ireland” (page 10); when, in fact, The Omnibus Partnership was the body of disabled people who invigorated and initiated the removal of the exemption. We recognize that, together, OFMDFM, the DRD and DOE amended the original, but we feel it only appropriate that the actions of disabled people, such as ourselves, be accorded appropriate recognition, also.



Question 3

Has the improvement in the accessibility of public transport (i.e. accessible buses, trains, Door-2-Door services etc) increased the travel opportunities for disabled people and older people?

The Omnibus Partnership notes that this question is presumptuous and, even, prescriptive: implying that every respondent should have answered a simple “yes” to Question 1.

But, like Question 1, the answer, here, too, cannot be a straight “yes” or “no”: it depends.

Question 4

Can you say why?

The Omnibus Partnership knows, from experience, that, where appropriate vehicles and services are in place, disabled people enjoy using them and enjoy the freedom that using them gives.

That being said, professional and public attitudes have a large part to play in how comfortable and confident disabled people and older people can feel, about using all transport services, accessible to them, here, in Northern Ireland: it is of no use having vehicles, on the road or the tracks, if, for example, ramps cannot be deployed, maybe for no reason other than attitudinal, if you cannot determine where your stop is, if no one is willing or cannot remember to tell you, or if you are denied access to a door to door service because you live just 500 meters beyond the boundary and you are advised the service can never be available to you.

Clearly, buses, trains and door to door services are only as accessible, to disabled people and older people, as the attitudes of the policy makers and professionals, providing them, allow.



Question 5

What are the remaining barriers to making public transport accessible for disabled people and older people?

The Omnibus Partnership knows, from experience, that the primary remaining barriers to making transport, not just public transport, here, in Northern Ireland, accessible to disabled people and older people, are the following, in priority order; where 1 = biggest barrier:

1. the disablist attitudes endemic to the PPTD, TPPD and MIU: one immediate, but typical, example being the ignorant stereotyping of disabled people and older people, evident in Question 1;
2. the failure to respect and respond to the lived experiences and resulting expertise of disabled people and older people;
3. the failure to implement and complete the previous Action Plan, in accordance even with its own timetable;
4. the lack of information in accessible formats: lack of information is disempowerment;
5. the lack of accessible public buses and community transport in rural areas;
6. the lack of audiovisual systems on public buses: just because wheelchair users and people with other mobility impairments can access public buses and trains does not mean they are democratically accessible to all;
7. the misuse of Blue Badge Bays, by non-disabled drivers;
8. the lack of door to door vehicles and services, which are fit for purpose;
9. the unreasonable costs levied on wheelchair users and some other disabled people, by a significant number of taxis.



Question 6

How can these barriers be overcome?

The Omnibus Partnership recommends the following, to overcome the barriers, listed at Question 5:

1. provide training for all PPTD, TPPD and MIU staff: delivered by disabled trainers and older trainers, from a Social Model paradigm, including interactive work on who disabled people and older people are, our various needs and rights, and PPTD's, TPPD's and MIU's legal duties, here;
2. consult with, respect and respond, positively, to the experience and expert opinions of disabled people and older people and our representatives, in particular IMTAC, both when preparing and when delivering policies, practices and, even, tenders, which, ultimately, affect our lives;
3. implement and complete the previous and this Action Plan, the latter, at the latest, in accordance with its own timetable: remember, actions speak louder than any words;
4. ensure disabled people's and older people's rights to information, which is accessible, to them, by advertising its availability, widely, on all DRD documents, and making such provision a condition of all PPTD, TPPD and MIU current and future funding;
5. ensure that all public buses are, indeed, accessible, by 2012; and that all community transport vehicles in rural areas are in accordance with current DPTAC Small Bus Specifications, also, by 2012;
6. ensure that all public buses, both in rural and urban areas, include audiovisual systems, by 2012;
7. ensure the proper enforcement of Blue Badge Bays;



8. ensure that all door to door vehicles are in accordance with current DPTAC Small Bus Specifications, that they operate, not as an individual taxi service, but consistently, across Northern Ireland, as a demand responsive, small bus service, as agreed, originally, in 2005, and with all information, including billing information, available in formats, which meet their various members' needs;
9. work with the DOE, to introduce regulations, in accordance with Northern Ireland's recent Taxis Act, to ensure a demographic and democratic consistency of charges, here.

Question 7

The new ATS draft Action Plan includes new actions to improve the accessibility of transport, do you agree with them?

The Omnibus Partnership agrees, in principle, with all the actions in the draft Action Plan; with the proviso that their implementation must be initiated and developed in full consultation with disabled people and older people and their representative bodies, in particular, IMTAC. Moreover, it is essential, this time, that the actions, in the draft Action Plan, are, indeed, put into action, at the latest, in accordance with its own timetable. That being said, we note that many of the actions are "ongoing", whatever this means, in real terms: so, we recommend that, instead, final dates be set, for each action and that these, too, be put into action, at the latest, according to these dates and, certainly, well before 2012.

The Omnibus Partnership recommends one change, however: that the reference to "Disability awareness and diversity training" (P06 A02), which, now, is "old hat", be amended to "Disability Equality and Awareness Training", with the addendum that it be delivered by experienced disabled trainers: after all, not all disabled people have had the same educational opportunities, to obtain qualifications, as their non-disabled peers.



Question 8

Are there any actions which have not been included within the draft Action Plan that you would like to see included?

The Omnibus Partnership recommends that the following actions be included within the final Action Plan:

1. independent reviews, conducted by the Consumer Council, of the current door to door and concessionary fares schemes;
2. the inclusion of audiovisual systems, on all public buses, both in rural and urban areas, by 2012.

Conclusion

The Omnibus Partnership thanks the Department for the opportunity to respond to its draft Action Plan.

We are, of course, happy and would welcome the opportunity to discuss any of the points and recommendations we have made.

Barbara Fleming
Secretary