

# National Disability Authority's Submission to National Transport Authority's Statement of Strategy 2018-2022

## Introduction

The National Disability Authority (NDA) is the independent state body providing expert advice on disability policy and practice to the government and the public sector, and promoting Universal Design in Ireland.

The NDA welcomes the opportunity to make a submission to the **National Transport Authority's Statement of Strategy 2018-2022**.

Transport plays a crucial role in the lives of people with disabilities. In the **Comprehensive Employment Strategy 2015 – 2024** and the **National Disability Inclusion Strategy 2017 – 2021**, transport is highlighted as one of the key services that helps people with disabilities to participate in everyday life and the activities of their communities. Approximately one in ten people with disabilities said that inadequate/inaccessible transport systems prevented them from participating in social events.<sup>1</sup>

Having a job and more importantly being able to get to that job is an important part of participating in everyday life. About one in six people with a disability not in work who would be interested in a job cite transport or parking as an issue for them. Those with sight, mobility or intellectual disabilities are most likely to cite transport as an issue for employment.<sup>2</sup>

The NDA acknowledges the progress that the National Transport Authority has made to date in providing an integrated accessible public transport system for people with disabilities, for example:

- The Dublin Bus Fleet is 100% accessible and the Bus Éireann regional/intercity coach services are 80% accessible by lift

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<sup>1</sup> National Disability Survey (2006) Vol. 2, Table 7.30

<sup>2</sup> National Disability Survey (2006) Vol. 2, Table 7.30

- As detailed in action 2.16 of the **Comprehensive Employment Strategy for People with Disabilities 2015 – 2024**, the number of wheelchair accessible taxis on the road have increased from 4.9% in December 2014 to 5.9% in June 2016, as a result of the Wheelchair Accessible Grant Scheme
- As detailed in actions 2.20 and 5.3 of the **Comprehensive Employment Strategy for People with Disabilities 2015 – 2024**, an accessible website - Transport for Ireland was established that features the National Journey Planner app. This app helps people to plan their transport journey from end to end across bus rail and taxi services. The website also features the Real Time Information app for Dublin Buses online and at bus stops. Bus stops also use a wheelchair symbol to show which bus stops are wheelchair accessible. 670 Real Time bus stop signs have been placed throughout the county with Real Time Passenger Information. More signs are being rolled out around the country
- As detailed in action 5.4 of the **Comprehensive Employment Strategy for People with Disabilities 2015 – 2024**, the Rural Transport Programme has been restructured to provide a more efficient, streamlined rural service. Local transport services throughout the country are managed by 17 offices instead of 35. Many of these offices are based in local authorities and work with organisations to provide people with and without disabilities with transport services. A central booking service for the Rural Transport Programme with an online app and a website for the service called Localink was established to make it easier for customers to book the service
- Service providers including Dublin Bus, Bus Éireann and Iarnód Éireann have set up their respective user groups of people with disabilities to help them to improve the accessibility of their services

The NDA welcomes the opportunity to continue working with the National Transport Authority to build upon the progress it has made to date and to work towards providing an integrated universally designed public transport service.

## Governance

Under the **Comprehensive Employment Strategy for People with Disabilities 2015 – 2024**, the National Transport Authority committed to implementing several actions to develop and provide an accessible public transport service that would help people with disabilities get to work and to participate in everyday life.

The National Transport Authority's current **Statement of Strategy 2015 – 2017** contains several priority actions to improve the accessibility and availability of public transport.

The National Transport Authority has also committed to several actions in the **National Disability Inclusion Strategy 2017 – 2021** to improve the accessibility and availability of public transport.

As stated previously, the National Transport Authority has made some progress in providing an integrated accessible public transport system for people with disabilities. The NDA therefore advises that the National Transport Authority should expand its focus from improving the accessibility of public transport services to providing an integrated universally designed public transport service.

Universal Design is the design and composition of an environment so that it can be accessed, understood and used to the greatest extent possible by all people regardless of their age, size, ability or disability. An environment (or any building, product, or service in that environment) should be designed to meet the needs of all people who wish to use it.<sup>3</sup>

Implementing a Universal Design approach to its services will help the National Transport Authority to automatically build accessibility measures into the environment it operates in and the services it produces, thereby ensuring that these issues get appropriate priority over the coming years.

It will also ensure that the organisation provides services to a wider range of the population, thereby potentially increasing their customer base and maximising the return on investment in service provision.

Regarding the provision of transport services to people with disabilities, this commitment should also cover all disability types including physical, sensory, intellectual and mental health.

The NDA therefore recommends the inclusion of appropriate objectives and actions in relation to Universal Design in the **National Transport Authority's Statement of Strategy 2018 – 2022**, including a reference to the Department's commitments under the **National Disability Inclusion Strategy 2017-2021**.

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<sup>3</sup> NDA's Centre for Excellence in Universal Design website's at <http://universaldesign.ie/>

## **Corporate Services Function**

In relation to the National Transport Authority's corporate services function, the NDA would welcome the inclusion of explicit commitments to ensure the organisation implements a Universal Design approach to providing accessible services, information and public premises to people with disabilities, and the procurement of accessible goods and services, as required under sections 25-28 of the Disability Act 2005.

Including these commitments into the National Transport Authority's corporate services strategy communicates the message to employees, vendors and customers that the organisation fully supports the implementation of the Universal Design approach.

As part of the implementation process, it would be important to have clear procedures and protocols so that all employees understand how to practically apply the principles of Universal Design to procuring goods and services and providing services.

The NDA's Centre for Excellence in Universal Design has produced publications and guidance on producing universally designed services that the National Transport Authority may find helpful, for example:

- **Building For Everyone, a Universal Design Approach** – a comprehensive best practice guidance on how to design, build and manage buildings and spaces so that they can be readily accessed and used by everyone, regardless of age, size ability or disability
- **Shared Space, Shared Surfaces and Home Zones from a Universal Design Approach for the Urban Environment in Ireland**

These and other documents can be downloaded from the Centre's website at <http://universaldesign.ie/>.

The NDA's Centre for Excellence in Universal Design in partnership with the Department of Public Expenditure and Reform has recently launched a **Customer Communications Toolkit for the Public Service – A Universal Design Approach**. This publication provides public bodies with guidance on how to provide customers with universally designed verbal, written and digital communications. The NDA would be happy to provide the National Transport Authority with a copy of this publication and to provide any necessary advice and support regarding the effective rolling out of the toolkit.

## **An Inclusive Work Environment**

The NDA is pleased to note that the National Transport Authority's commitment to including people with disabilities extends to its work environment.

The National Transport Authority continues to use our elearning programme to increase all employees' awareness of people with disabilities.

In 2015, the National Transport Authority reported that 3.8% of their employees reported a disability. This is an increase from 1.4% in 2014.<sup>4</sup>

The NDA suggests that a key focus of the National Transport Authority's HR strategy should include actions to increase recruitment and employment opportunities for people with disabilities. The Government has committed to incrementally increasing the statutory employment target to a minimum of 6% by 2024. Achieving the target should be an explicit objective in workforce planning for the National Transport Authority.

The NDA has produced guidance on the recruitment, employment and retention of people with disabilities. This guidance can be downloaded from our website at <http://nda.ie/Publications/Employment/Employment-of-people-with-disabilities-in-the-public-service/>

## **Disability Impact Assessments**

The National Disability Authority encourages the National Transport Authority to make use of Disability Impact Assessments (DIAs) in relation to policy formation. These DIAs are aligned with the Regulatory Impact Assessment process and are carried out in tandem with it. The Disability Impact Assessments build upon the existing provision in the Cabinet Handbook to disability-proof significant memoranda for Government. They underpin the commitment in the Programme for Government to ensure that the quality of life of people with disabilities is enhanced and that resources allocated reach the people who need them.

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<sup>4</sup> Report on Compliance with Part 5 of the Disability Act 2005 for 2015

## Joined Up Approach

The NDA acknowledges that there are a number of aspects of the National Transport Authority's role that require cross-departmental cooperation to achieve success.

### **Accessible wheelchair spaces**

The NDA is pleased to note that the Dublin Bus Fleet is 100% accessible for boarding and disembarking. However, on each bus only one person in one wheelchair can fit into the wheelchair accessible space. Sometimes people with disabilities cannot get into this space because people with buggies are using it.

The NDA welcomes the National Transport Authority's plans to examine the bye-laws for legal clarity that wheelchair users have priority over buggies on buses.

The NDA also suggests that the National Transport Authority consider developing a public awareness campaign that clearly explains that Dublin Buses are universally designed for everyone's use and as such have a dedicated separate space for storing buggies and a dedicated separate space for people using wheelchairs and people with mobility issues. It is important that customers understand and appreciate why the wheelchair accessible spaces should be clear for people using wheelchairs, as this could help their cooperation regarding this issue. The NDA is available to work with the National Transport Authority on this matter.

### **Accessible coach stops**

80% of Bus Éireann's coach fleet is now wheelchair accessible, with built-in lifts allowing wheelchair users to be lifted on and off the coach. Bus Éireann started buying accessible coaches almost ten years ago.

However, these coaches require a large bus stop with a flat area large enough to accommodate the wheelchair lift. Most Bus Éireann's bus stops, which are provided by local authorities, do not accommodate these wheelchair lifts. At present, only four Bus Éireann's routes provide services to passengers in wheelchairs.

The NDA acknowledges the significant progress that has been made to date in delivering accessible bus stops for city buses. We have worked closely with transport providers and local authorities on the design of suitable stops to accommodate accessible buses and coaches.

Under action 2.19 of the **Comprehensive Employment Strategy for People with Disabilities 2015 – 2024**, the National Transport Authority states that it will:

“Invest in supporting infrastructure to increase their level of accessibility i.e. bus stops, bus and rail stations, bus ramps.”

The NDA would welcome a strategic commitment from the National Transport Authority in its **Statement of Strategy 2018 – 2022**, to work with its parent Department – the Department of Transport, Tourism and Sport – and relevant Local Authorities, on the provision of accessible coach stops in strategic locations that would facilitate people with disabilities transferring to the accessible coach fleet.

This commitment dovetails with the National Transport Authority’s responsibilities under action 109 in the **National Disability Inclusion Strategy 2017 – 2021** to

“ensure further roll-out of accessible inter-city coaches and accessible regional/rural coach and bus stops”.

### **Licensed and Outsourced Services**

While considerable progress has been made on the accessibility of transport services provided directly by public bodies, there has been less attention given to services provided by private operators either licensed by the National Transport Authority or operating under contract. Some private providers recognise the business case around reaching the widest possible customer base, and provide quality services to address this need.

Under action 2.13 of the **Comprehensive Employment Strategy for People with Disabilities 2015 – 2024**, the National Transport Authority states that it will

“Examine the introduction of conditions on licensed commercial operators of public transport services to provide wheelchair accessible vehicles.”

The NDA recommends that providing a universally designed service would be important criteria in all licensed road, rail and tram services. This should be a key strategic priority for the **National Transport Authority’s Statement of Strategy 2018 – 2022**.

The NDA is pleased to note that under action 102 of the **National Disability Inclusion Strategy 2017 – 2021**, the National Transport Authority states that it:

“will undertake a market consultation exercise with bus vehicle manufacturers who engage with us to establish the feasibility and availability of certain wheelchair accessibility options suitable for use in Ireland, and develop proposals in relation to attaching conditions regarding wheelchair accessibility on commercial licensed services”.

This commitment will be a key step towards ensuring that private providers give a universally designed service to the public.

## **End to End Trips**

People with disabilities may require different supports from the time they begin their journey to when they reach their destination. **The National Transport Authority’s Statement of Strategy 2017 – 2021** should include actions that focus on the end to end journey, for example:

- Accessing information on fares
- Accessing information to plan and make the journey

### **Accessing information on fares**

Under action 2.13 of the **Comprehensive Employment Strategy for People with Disabilities 2015 – 2024**, the National Transport Authority committed to simplifying the fares structure across the public transport modes to make them easier to understand for people with different disabilities.

The National Transport Authority has implemented this action. The new **Statement of Strategy 2017 – 2021**, should also include a commitment to ensure that the fare structure remains accessible across the public transport modes.

Under action 2.15 of the **Comprehensive Employment Strategy for People with Disabilities 2015 – 2024**, the National Transport Authority also committed to developing the functionality and the availability of the Leap card so that it simplifies the payment for travel for those with a disability.

The National Transport Authority has implemented this action. The new **Statement of Strategy 2017 – 2021**, should also include a commitment to ensure that the functionality and the availability of the Leap card remains accessible to people with disabilities.

### **Accessing Information to plan and make the journey**

Under action 2.20 in the **Comprehensive Employment Strategy for People with Disabilities 2015 – 2024**, the National Transport Authority states that it will:

“Develop the information tools that are currently available to ensure that they include the information that a person with a disability needs to know in order to take a public transport journey e.g. the National Journey Planner on [www.transportforireland.ie](http://www.transportforireland.ie). is being developed to have an option to plan a journey with no steps.”

Under action 5.3 in the **Comprehensive Employment Strategy for People with Disabilities 2015 – 2024**, the National Transport Authority also states that it will:

“Develop the Real Time Information system both on-street and on web and smart phone applications to be more accessible and to include real time information that is of value for a passenger with a disability e.g. wheelchair symbol on real time information identifies services that are wheelchair accessible.”

The National Journey Planner app on the Transport for Ireland website has been launched and is designed to help people to plan their transport journey from end to end across bus, rail and taxi services.

The Real Time Information system both on-street and on web and smart phone applications that uses the wheelchair accessible symbol has also been launched. Bus stops with Real Time information and the wheelchair accessible symbol are in the process of being rolled out across the country.

Under Action 2.21 of the **Comprehensive Employment Strategy for People with Disabilities 2015 – 2024**, the National Transport Authority states that it will:

“Implement on-board announcements of next stops on all public transport to assist those with a visual impairment.”

This action had been implemented but it will be important to ensure that a consistent approach is taken to making these announcements on all public transport.

In the **National Disability Inclusion Strategy 2017 – 2021**, the National Transport Authority, working with Iarnód Éireann, Córas Iompair Éireann, Bus Éireann and public transport operators, have stated that they will make it easier for people with disabilities to plan their journey from end to end by carrying out the following actions:

- Introducing a pilot scheme on the DART for mobility-impaired customers requiring assistance that will significantly reduce the advised notice time for

travelling, and ensure a better response when customers requiring assistance cannot give notice (action I 01)

- Reviewing operational issues in relation to the need for advance notice of accessibility requirements for train travel with a view to removing barriers for service users with a disability (action I 10)
- Implementation of consistent and reliable on-board audio and visual announcements on all public transport vehicles including buses, coaches DART, trains and trams and to monitoring and maintaining this aspect of accessibility (action I 11)

The NDA welcomes these commitments and recommends that the **National Transport Authority's Statement of Strategy 2018 - 2022** prioritise actions and future investments that focus on the end to end experiences of all transport users, including people with disabilities. This would ensure that transport connections to train stations, bus and Luas stops and taxi ranks are universally designed so that people with different disabilities and other vulnerable groups can get to the accessible train stations etc.

An increased focus on the end to end journey will also ensure that websites and apps are universally designed and that all staff are trained to recognise and accommodate the additional needs of people with disabilities and other vulnerable groups. An important element of this process is to continue to develop and monitor the passenger assistance concept for assisting people with a disability to plan their public transport journeys as detailed in action 2.12 of the **Comprehensive Employment Strategy for People with Disabilities 2015–2024**.

### **Roads and streets**

Under action I 00 of the **National Disability Inclusion Strategy 2017-2021**, the National Transport Authority working with the Department of Transport Tourism and Sport and the local authorities states, that it will

“prioritise the maintenance, management and monitoring of systems and services which make transport accessible”.

The NDA recommends that the National Transport Authority should include this action in its **Statement of Strategy 2018-2022**. We also recommend that the National Transport Authority include the maintenance and management of roads and streets as an essential part of an integrated universally designed public transport service.

Accessible roads and streets play a key role in ensuring people with disabilities, older people and parents with small children can partake in community life and get to where they want to go.

The NDA has worked closely in the past with the Department of Transport Tourism and Sport, the Local Government Management agency (LGMA) and the local authorities on this matter, resulting in the publication of **Roads and Street Design for All** by the LMGA.

The NDA welcomes the recent **Design Manual for Urban Roads and Streets**, and will support the development of an audit tool to evaluate the key problem areas for people with disabilities and other vulnerable users from a Universal Design approach.

### **Participation in everyday life**

One of the themes of the **National Disability Inclusion Strategy 2017 – 2021** is Person-Centred Disability Services.

Transport is highlighted as one of the key services that helps people with disabilities to participate in everyday life and the activities of their communities.

The National Transport Authority's **Statement of Strategy 2018-2022** should contain clear actions, protocols and resources, on how your organisation will work in partnership with the Department of Transport, Tourism and Sport, the Department of Arts Heritage and the Gaeltacht and other agencies to support people with disabilities to participate in everyday life.

### **Monitoring and measuring the impact of service provision**

Under action 100 of the **National Disability Inclusion Strategy 2017-2021**, the National Transport Authority states that it will:

“prioritise the maintenance, management and monitoring of systems and services which make transport accessible”.

The NDA advises that the organisation's **Statement of Strategy 2018 – 2022** should contain actions and resources to develop, pilot and implement an online system that not only monitors but also measures the impact of the actions that the National Transport Authority is implementing to develop and provide an integrated universally designed public transport service.

This system will capture accurate data that displays the organisation's good practice and highlight the gaps in service provision that need to be addressed.

The NDA has had an initial meeting with the relevant personnel in the National Transport Authority on this issue. A follow up meeting has been scheduled. The NDA is looking forward to further engagement with your organisation on this and other issues.

## **Getting to work**

Having a job and more importantly being able to get to that job is an important part of participating in everyday life.

In the **Comprehensive Employment Strategy for People with Disabilities 2015 – 2024**, an integrated universally designed public transport service is named as one of the key drivers to helping people with disabilities to get to and remain in work. The National Transport Authority therefore has a pivotal role to play in providing a service that supports people to get to work.

The National Transport Authority has made significant progress in implementing some of its commitments under this Strategy. The NDA recommends that the National Transport Authority should implement the remaining actions it has responsibility for in the **Comprehensive Employment Strategy for People with Disabilities 2015 – 2024** and prioritise these actions in its **Statement of Strategy 2017 – 2021**. These actions are as follows:

- Action 2.11 Develop the concept of car-sharing beyond the car sharing website and voluntary car schemes that currently exist and tailor that provision for those with a disability

The NDA recognises that one of the objectives of the National Transport Authority is to increase the population that uses public transport. However, an important aspect of an integrated universally designed public transport service is providing people with services that they wish to use. Some people with disabilities may still wish to use their cars. The car sharing service may also provide an important opportunity to catch up socially with friends, as well as a means of getting people with disabilities to where they want to go. For some people with disabilities car sharing may be the only viable transport option they have. It is therefore crucial that it is included in the **Statement of Strategy 2017 – 2021**.

- Action 2.17 Provide a subsidy to fund the provision of public transport services throughout the state

The NDA suggest that the **National Transport Authority's Statement of Strategy 2018 – 2022**, could include an action detailing how they will ring fence funding for the provision of an integrated universally designed public transport service. This could also include the provision of a subsidy to fund this service.

## **Making Work Pay for People with Disabilities**

Many people with disabilities are afraid to take a job because they are afraid of losing certain welfare payments and secondary entitlements they currently hold, including the Free Travel concession.

Strategic Priority 3 of the **Comprehensive Employment Strategy for People with Disabilities 2015-2024** is to make work pay for people with disabilities.

In 2017, the Department of Social Protection published the **Make Work Pay for People with Disabilities Report**. This report contains a series of recommendations including reconfiguring the system of payments and supports to ensure that works pays and future proofing this system, including the recommendation that people with disabilities who take up employment retain their entitlement to the Free Travel Pass for a period of three years.

The NDA recognises that the National Transport Authority is not directly involved in the provision of such welfare and transport supports. However, a reconfiguration of these supports and a potential increase in the number of people with disabilities going to work and using public transport highlights the urgency of having an integrated universally designed transport system in place in the next few years.

The **Make Work Pay Report** also recommends a review of transport supports that dovetails with action 104 of the **National Disability Inclusion Strategy 2017-2021**, which states that:

“The Department of Justice and Equality, with support from the NDA, is leading out on a cross departmental review of transport supports, including all Government funded transport and mobility schemes for people with disabilities to enhance the options for transport to work or employment supports for people with disabilities.”

The objective of this review is to develop a coordinated plan for such provision and to make the most efficient use of available transport resources.

The National Transport Authority and the Department of Transport Tourism and Sport has a key role to play in this process. The National Transport Authority should include the actions, protocols and resources it will commit to participate in this process in its **Statement of Strategy 2018 – 2022**.

The report also suggests that all Government Departments should work together to ensure that, at the design stage, new welfare schemes or reforms are

simplified and focused on supporting people with disabilities into work and ensuring that they are not financially disadvantaged by taking up employment.

In its **Statement of Strategy 2018 – 2022**, the National Transport Authority could consider including a commitment to participating in this process.

## Conclusion

The National Disability Authority recognises the considerable progress made by the National Transport Authority to provide an integrated accessible public transport service that will enable people with disabilities to get where they want to go and to participate in society.

This submission has set out priority areas for attention for the **National Transport Authority's Statement of Strategy 2018-2022**.

The National Disability Authority is looking forward to continuing to work with the National Transport Authority to provide an integrated universally designed public transport service.