

National Disability Authority
Policy Advice Paper
on the
Department of Transport, Tourism & Sport's
Review of the Sectoral Plan for Accessible Transport
under the Disability Act 2005
Transport Access for All
September 2011

Issues for Consideration

Please feel free to comment on any issue relevant to the current Plan, or more generally, to the successful delivery of accessible transport. Your views on accessibility aspects concerning tourism and sport would also be appreciated. We would particularly welcome your views on the following key issues:

1. Is progress being made against the current Plan commitments (in terms both of speed and coverage)? If not, where are the gaps and what changes need to be made to improve progress?

Transport is essential to enable people with disabilities take a full part in work, and in social and community life outside the home. The National Disability Survey 2006 showed about 4% of the population had difficulty in doing a 15-minute walk, and that 83,000 people used walking aids: about half those with mobility difficulties are aged 65 or over.

NDA research conducted in 2009 showed that about one in five people with disabilities had difficulties in getting to business or social destinations. About 10% of people with disabilities had difficulties getting to an access point for public transport, such as a bus stop or a station. Door to door transport is essential for people with a very limited walking capacity, who cannot get to a bus stop.

The National Disability Authority recognises the significant progress that has been made under the Department's Sectoral plan on disability, in particular, the improved accessibility of public transport. The NDA would welcome a continuation of this approach to transport, and a similar structured approach to securing social inclusion for people with disabilities in terms of your Tourism and Sport responsibilities.

The NDA acknowledges the following achievements since 2008:

- The major progress towards full accessibility of Dublin Bus, the achievement of accessibility on provincial city bus services, Irish Rail, and the introduction and extension of the fully-accessible Luas service
- Significant work on progressing the accessibility of the associated environment – progress on accessible bus stops, train and bus stations and their environs
- The roll out of accessible inter-city coaches and bus stops in partnership with local authorities
- The developments in accessibility of air passenger transport, and the attention to disability in the design of Terminal 2 at Dublin airport
- The Guidelines for Accessible Maritime Passenger Transport
- The licensing of taxi dispatch operators

- The wheelchair accessible vehicle (WAV) standards
- The issuing of WAV-only licences from 8 June 2010
- The new grant aid scheme for WAVs
- The setting up of the Taxi Review under Minister Alan Kelly, which is giving particular focus to accessible taxis
- The publication of the Department's review of the Disabled Parking Scheme and the subsequent regulations that revise the criteria for eligibility for a Disabled Person's Parking Permit from a focus on type of medical condition to a focus on level of mobility impairment.

Keeping progress on track

Importance of effective relationships at local level

The delay around the delivery of accessible coach stops on the pilot inter-city accessible coach services point to the need to get effective working relationships at local level between the relevant players for any future expansion of the service.

2. Do you think the current Plan is helping to improve the quality of life for people with disabilities? In what ways and how could this be improved?

What is important to people with disabilities is getting to where they want to go. There is a group of persons who:

- Don't drive
- Can't walk to the bus stop
- Live too far from public transport, or
- Are unable to get on public transport

Accessible door-to-door services would be essential for them.

A review of publicly-funded door to door services

The Minister of State has stated¹ that the Department is already exploring the efficiencies that can be achieved by bringing together aspects of HSE transport, school transport, the rural transport programme and other transport services. The emphasis is on getting better connectivity while using existing resources.

In the very near future, the Department will publish a study of a pilot scheme on the integration of transport services that has been carried out in the North East and North West. A value-for-money and policy review of the rural transport programme is also due for publication at the same time.

The NDA advises that a review of the efficiencies to be achieved should be a comprehensive one, bringing in all relevant kinds of transport including smaller Public Service Vehicles, exploring the regulatory and other barriers to achieving better use and integration of these services, and with a specific focus on enabling people with disabilities make door to door journeys. The review needs to involve all the relevant Departments and agencies with a funding or regulatory role – Education, Health, HSE, Revenue and the Gardaí, as well as the Department of Transport, Tourism and Sport. In the current financial climate, it is essential to ensure the best use of the range of publicly-funded or publicly-licensed door-to-door resources to meet the transport needs of people with disabilities, of other vulnerable groups, and of the wider public. Among these resources are:

- Taxis and hackneys
- Rural Transport Programme vehicles
- School buses
- Special transport operated by disability service providers, the HSE, or other voluntary bodies

¹ <http://debates.oireachtas.ie/dail/2011/09/29/00018.asp>

- Specialist disability transport like Vantastic, operating on a travel club model

Among the barriers to more effective use and integration may be:

- Different forms of transport come under the remit of different Government Departments
- Differences in regulatory and in vehicle standards across these different kinds of transport
- Application of the Disabled Drivers and Passengers tax concessions to specialist disability transport operated by disability service providers, and any associated restrictions on vehicle use
- Contractual issues related to current deployment of different kinds of transport
- Employment status of drivers
- Public liability and insurance

Regulation and integration

Many vehicles are used for specific journeys only when they could be working on behalf of other customers while still carrying out their primary function.

There are a number of “travel clubs” e.g. Vantastic, operating around the country that would fit in with the transport providers already listed. They already provide a door-to-door service. An amendment of the Road Transport Act 1932 would need to be considered in this case.

There are a number of disability service providers that have minibus transport for their service users in order to bring them to a day service, on outings, or for special school transport. These vehicles would be mainly used in the mornings and afternoons. It should be possible to call upon these vehicles when they are not fulfilling their primary function. The new model of adult day service being considered by the HSE will have less focus on centre-based activities, and more on linking people with disabilities in to what is already going on in their communities. That will have implications for how such transport services are deployed in the future.

Section 13 of the Public Transport Regulation Act 2009 allows for the attachment of conditions to the granting, amendment or renewal of a licence. Accessibility is mentioned in paragraph 13(2)(i) of the Act. The NDA advises that accessibility becomes a central requirement of any proposals for licensing of services, and in particular that accessibility should be a key criterion for any future proposals to contract out public transport routes.

The National Disability Authority suggests that there are number of ways in which this could be achieved. Some changes could be considered by the Department and its agencies; others would reflect the provisions on cooperation set out for the Minister for Transport, Tourism and Sport in section 34 of the Disability Act 2005.

Vehicle Standards

There are comprehensive National Vehicle Standards in place for Small Public Service Vehicles. There are also accessible vehicles standards in place for mini vans and mini buses.² These vehicles are classed as M₂ under the EU Directives, i.e. vehicles designed and constructed for the carriage of passengers, comprising more than eight seats in addition to the driver's seat, and having a maximum mass not exceeding 5 tonnes.

It may be useful to harmonise vehicle standards as much as possible across the range of transport providers, facilitating the complementary operation of the different services. Harmonisation may also be an opportunity to ensure that important safety features for people with disabilities are addressed across different forms of transport. It may also clarify local arrangements for approval and licensing, and remove the risk that EU-approved vehicles are not passed at local level (as occurred in the past).

While any harmonisation may require a period of adjustment for different providers, ultimately people with disabilities would benefit from having a range of different transport to choose from, operated in a safe manner.

As powered wheelchairs become more widespread, it is also important to maximise the number of transport providers who are able to safely transport people using these.

The taxi industry

The Review body chaired by Minister of State Alan Kelly, TD is currently examining in some detail the issues relating to current and future availability of wheelchair-accessible taxis.

It is widely acknowledged that as the current wheelchair fleet reaches the end of its useful life; taxi interests have stated it is likely to prove uneconomic to replace them from what is currently available on the Irish market and in the light of new standards (which have an important safety dimension). Some additional incentivisation or changes in the regulatory regime may be required to ensure a viable wheelchair accessible service. For example, excise, VAT or VRT remission on the import of accessible vehicles from the UK for use as taxis could be considered.

Central contact point

What has worked in other locations such as London is a variety of vehicle types available 24/7 that complement each other. This system is operated from a central contact point. A customer indicates they need an accessible vehicle and the operator locates the nearest appropriate vehicle in the customer's area. It could be helpful in Ireland if a central contact point could link people in with not only taxis, but other available forms of accessible transport, particularly if it is

² S.I. No. 158 of 2009 EUROPEAN COMMUNITIES (ROAD VEHICLES TYPE-APPROVAL) REGULATIONS 2009

possible to achieve better integration of different forms of provision into local accessible networks.

One of the main problems in providing accessible transport is the lack of responsibility that currently exists when wheelchair accessible vehicles are not available for hire. There is a case for a national central contact centre, or a series of contact centres based on the taximeter areas,

It would be much easier for the National Transport Authority to audit the performance of accessible transport providers from one location or a handful of locations.

A central contact centre would also allow for efficiencies around integrated journey planning for people with disabilities. The contact centre should have available all the accessible transport routes that a customer would require.

In an ideal situation a customer would ring for an accessible vehicle. The operator would then contact the relevant providers in the area and an appropriate vehicle would be dispatched to pick up the fare.

There would be a case for integrating as many independent accessible transport providers as possible under the remit of a central contact centre.

Taxi regulations

There are many rules governing the hire of taxis and hackneys.

It is currently illegal for a taxi to pick up a fare away from a taxi rank. Where people with disabilities are concerned it isn't always possible to get to a taxi rank, or, there aren't any nearby. This rule should be reviewed.

Taxis are currently limited to operate in a particular taxi area. This restriction could be re-examined in the case of wheelchair accessible vehicles.

Procurement

The Department and its agencies could also consider the role of public procurement in driving accessibility. There are many contracts for transport service providers issued by public bodies each year.

All providers of door-to-door transport should be eligible to compete for this business.

It should be possible to include accessibility requirements in transport procurement policies. This could specify that a certain percentage of the transport providers' vehicles meet the accessibility standards for their vehicle type. It could also be provided in any contract that such accessible vehicles would be for priority use by people with disabilities. This provision would be subject to independent monitoring.

It should be open for transport providers with mixed vehicle types to combine and bid for contracts.

It is worth examining, in conjunction with the Department of Public Expenditure and Reform, whether contract payments could be distributed in a manner that would allow transport providers to subsidise uneconomic routes or services as well as compensating hired independent drivers for these routes and services that would be part of the standard contract work.

Taxi pick up points

If all taxi ranks were accessed from the kerb on the left hand side of the vehicle, it would make it easier for passengers to access the vehicle. It would also remove the need for vehicle owners to have to comply with the requirement for two accessible doors, thus reducing costs.

Taxi ranks should be complemented by drop off and pick up points where all transport providers – including those who provide accessible transport - would be able to operate. People with disabilities could be dropped off at these points to continue their journeys. Those people waiting to meet someone with a disability off a transport service would have a limited period of time where they would be allowed to sit at this designated access point. The Gardaí could ensure that these access points are kept free for those who need to use them.

These access point could share space in city centres, they could be located outside public buildings, shopping centres, educational establishments, venues and cultural/heritage locations.

Possible driver incentives

Independent drivers of accessible vehicles should be given free radios in order maintain availability of accessible vehicles. These free radios would only be used for jobs where people with disabilities have called in.

A case could be made for re-classifying accessible vehicles as mobility aids. This would allow them to avail of the 0% VAT rate that currently applies to these items.

Passenger fares

The HSE's mobility allowance payment has been generally used to fund taxi journeys for those people with disabilities who don't have access to public transport. A recent court decision has removed the upper limit of 66 years of age for eligibility as it contravened equality legislation. This is likely to result in an alternative form of transport subsidy being considered for people with severely impaired mobility, in order to stay within the available budget while complying with the court ruling.

The HSE National Service Plan 2011 provided €13m for mobility allowance in 2011³. For the provision of a comprehensive, subsidised transport scheme for people with disabilities in 2010-11 Transport for London and the 32 London boroughs budgeted just under €22m.

³ <http://www.hse.ie/eng/services/Publications/corporate/nsp2011.pdf>, page 67

One possibility would be to use the existing smart-card technology to pre-load travel credits for people with disabilities. These credits would count down as each journey is taken. Their eligibility could be cross-referenced with information held by the HSE and/or the Department of Social Protection. Extension of smart-card technology to cover taxis and other forms of transport provision would open up new possibilities.

3. Does the current Plan adequately deal with the transport needs of people with the whole range of disabilities (physical, sensory and cognitive)? If not, where are the gaps and what could be done to make the plan better?

People have diverse needs and abilities as users or customers (as well as employees) of transport systems. It is necessary to consider design factors related to vision or hearing disabilities (such as providing tactile features, both visual and audio announcements, and the optimal acoustic quality of stations).

Consider physiological factors beyond wheeled mobility (wheelchairs users) to include people with luggage, prams, walkers with limited endurance, issues related to fatigue, strength, balance and simply people of a much different size than most. Also consider cognitive and mental factors that relate to memory, concentration and comprehension, stress, literacy and people with limited English.

It is valuable to engage specifically with relevant stakeholders around the details of design of universal and accessible features of important infrastructure projects, the vehicles/rolling stock to be deployed along the route, the interface, the built environment and streetscapes at transport points and on the operation and maintenance of accessibility for people with reduced mobility.

A universal design approach will be better informed by listening to the practical issues for stakeholders with disabilities, elderly people, and others with reduced mobility.

Currently, many people with intellectual disabilities avail of specialist transport rather than mainstream public transport to attend day services. In some cases, the location of someone's home, or the degree of disability, may mean that public transport is not a viable option.

However, with travel training, and simple assistance from the driver, it may become possible for more individuals to avail of public transport

4. Is the plan sufficiently comprehensive? Does it deal adequately with all forms of transport? Does it deal adequately with transfers or interchanges between various transport modes? If not, where are the gaps and what additional items should be included?

Travel Information

Everyone who uses public transport needs information to enable them to plan their journey. Timetables, journey times, pricing information, the availability of particular facilities and last-minute updates should all be available in a range of formats, including visual and audible. Clear, concise, accurate and timely information is crucial to people making journeys on all transport modes. For passengers with reduced mobility, quality information can be the difference between being able to make a journey or not. On-board information about each stop is critical for passengers with impaired sight or vision.

Information on the transport environment can be divided into three levels:

- Level 1 information, such as urgent safety information or immediate departures.
- Level 2 information, such as general timetable information, information about connections and general safety information
- Level 3 information, such as advertising.
- It is important that these three levels of information are clearly distinguished. Essential information, particularly safety instructions, should be easy to find and should not be obscured by advertising.
- It is important that public bodies, in trying to comply with their statutory obligations under section 9(1) of the Official Languages Act 2003 – and the accompanying regulations⁴ – do not compromise on the size of the lettering on transport signs to the detriment of health and safety, or the accessibility of information to people with a vision impairment.

Timetable information

The information in timetables may be complex, but it should be presented visually in a clear and logical format so that it is easy for everyone to understand. The National Adult Literacy Agency⁵ provides guidelines on its website on plain English writing. Timetables should be available inside transport terminals in an accessible location.

⁴ S.I. No. 391/2008 — Official Languages Act 2003 (Section 9) Regulations 2008, regulations 6 and 7. <http://www.irishstatutebook.ie/2008/en/si/0391.html>

⁵ <http://simplyput.ie/>

Not everyone is able to read a written timetable (for example people with impaired vision), not everyone can hear a talking timetable (for example those with hearing impairments) and significant numbers of people, particularly older people, do not regularly use computers. So it is important to provide timetable information in a range of different ways to suit the needs of different users, for example in regular print, in large print, in audio format and on a computer website that is designed for compatibility with screen reader technology.

Talking timetables

Timetable and journey information should be available via a telephone service as an alternative for people who cannot read timetables or regularly get to a station or stop. The service should also be accessible to people using a text phone. It should be available 24 hours a day, 365 days a year. Where a menu of 'talking timetables' is used, the sequence of information should be logical and considered carefully so as not to frustrate or confuse the people using it. Talking timetables cannot be used by many deaf or hard of hearing people, and should therefore be provided as a supplement to an operator service, rather than be the sole source for obtaining information.

Integrated journey planners on the web

Operators should consider the use of integrated journey planners on websites and maps. These offer the potential for detailed and precise journey details to be worked out before or during the trip. Information that is presented visually (such as on a map) should also be available in text format for people with vision impairments.

Many people, either through necessity or choice, require information about the availability of particular facilities on a journey. People who use wheelchairs may want to check that a destination station has step-free access and that a train has a wheelchair-accessible toilet facility. Information should be readily available, as part of an integrated journey planner, to enable people to adequately prepare for their journey and to travel in comfort to their expected destination.

Journey pricing information

Journey pricing information should be available in advance to allow people to budget for their journey and to make the necessary arrangements for payment upon arrival at the terminal. At the terminal, prices should be clearly displayed.

Pictorial signage

Use of accepted signs and symbols will benefit people with reading difficulties, intellectual disabilities. It also assists foreign travellers who may not be confident understanding or communicating using English or Irish.

Scheduling for connections

When transport services are scheduled, consideration should be given to the time allowed between connecting services so that everybody has time to transfer from one location to another. The time taken by someone with mobility difficulties, with small children, or encumbered by luggage to transfer from one

mode to another should be factored-in in what are considered to be reasonable times to make a connection.

Co-location of transport services

The journey starts when you close the front door. In light of newly planned infrastructure, or the reorganisation of existing services, the location of transport buildings such as bus, coach and railway stations should be carefully considered in relation to the communities they serve and the proximity of public buildings and services, shops and other local facilities. As journeys are often made by more than one mode of transport, it is beneficial if different modes of transport can be co-located, such as in a transport interchange which provides rail, bus and coach services. The convenient co-location of such facilities will promote public transport and have the added benefit of contributing toward a sustainable transport strategy. Where this cannot be provided, bus and coach stations should be located as close as possible to other transport services.

In all terminals and transport buildings, facilities should be provided for a taxi service and to enable private cars to drop off and collect passengers close to the building entrance. At railway stations, motorway service areas, harbours and airports, car parking facilities should be provided, including proximate and prioritised parking for disabled car users and for parents with small children, older people and those who have difficulty walking short/medium distances.

5. Should the Plan give priority to particular actions, if so which ones?

Transport

- Ensure all modes of transport (road, rail, tram, sea and air) are designed and run with a Transport for All focus, and maintain the “transport for all” focus of Transport 21
- Promote the development of demand-responsive and flexibility-routed local transport services, including rural transport, which are accessible to people with disabilities
- Promoting the provision of integrated journey planners, provided in accessible formats, to enable people plan their journeys by knowing which route segments or access/exit points are easily used by people with disabilities
- Ensure that all travel and transport initiatives are universally designed, to be accessible to everyone regardless of age, size, ability or disability. Make public funding and procurement of transport services conditional on compliance with accessibility standards
- Progress the findings of the Taxi Review group chaired by Minister Kelly, when its work is complete, and specifically those in relation to accessible taxi services for people with disabilities
- Promote cross-agency co-operation, coupled with the effective use of resources, to ensure that different elements of passenger journeys and the adjacent built environment, enable people with disabilities to complete seamless journeys
- Co-ordinate and integrate sustainable transport and travel policy with spatial planning
- Bring community transport services such as ACTS and Vantastic which offer door-to-door services within the regulatory framework for taxis, and that they come within the remit of the Department’s responsibility for transport matters
- Consider the integration and co-ordination of all publicly funded public transport, including school buses, and transport operated by health and disability service providers, into a co-ordinated web of services. A pilot project in that regard could chart a way forward
- Maintain an adequate supply of accessible taxi services, within the parameters of the Department’s role in this matter.

- Maintain accessibility that has been achieved across the transport infrastructure, both vehicles and buildings, ensuring that repairs and maintenance are adequately funded
- Maximise return on existing investment in Bus Éireann accessible coaches by continuing and extending work by local authorities to provide accessible coach stops
- Build on 'transport integration' remit of the National Transport Authority to examine in-depth how all forms of accessible transport funded by the public purse (whether public or voluntary sector) can be better realigned and integrated to eliminate any duplication of service provision, to maximise availability to users, and to integrate community and rural transport in a collect and connect framework
- Examine how free travel entitlement for people with disabilities, within current budget, can be realigned across such an integrated, accessible travel network

Tourism

- Promote the development of guidelines for the accessibility of tourism facilities to people with disabilities
- Develop a project on standards in tourism for people with disabilities. Involve stakeholders in the development of standards. Roll out a competition, along the lines of tidy towns, for accessible towns
- Develop a programme to register and market tourism services (accommodation, car hire, facilities, attractions, natural amenities, heritage sites) that are accessible to people with disabilities
- Develop a programme to ensure that state-funded tourism facilities are accessible to everyone regardless of age, size, ability or disability, and make new state funding conditional on such accessibility.

Sport

- Continue the work of Sports Inclusion Disability Officers, and the promotion of opportunities for engagement in sport and physical activity for people with disabilities and for older people
- Develop a programme to ensure that state-funded sports facilities are accessible to everyone regardless of age, size, ability or disability, and make new state funding conditional on such accessibility.

6. If priorities have to be adjusted for economic reasons, where would you place the highest priority in delivering accessibility?

Managing reductions in expenditure, to close the gap in the state's finances, will be a major challenge for the Department over the next three years. The National Disability Authority is fully aware of the budgetary and resource decisions the Department faces due to the requirements in the EU/IMF Programme of Financial Supports for Ireland, Employment Control Frameworks and the Croke Park Agreement 2010-2014.

The National Disability Authority advises that the impact of any changes on people with disabilities should be carefully considered. In particular, it should be noted that curtailment of transport services which are accessible to people with disabilities (including door-to-door transport such as the rural transport programme and specialist transport services, like Vantastic) can have a disproportionate effect on people with disabilities who may have few alternative options to enable them leave their homes.

7. Is the plan sufficiently firm to achieve its policy objectives and targets for accessible transport?

There is a pilot currently underway around the provision of Disability Impact Assessment by Departments in relation to policy formation. These Disability Impact Assessments are being aligned with the Regulatory Impact Assessment process and will be carried out in tandem with it.

What is clear is that it will build upon the existing provision in the Cabinet Handbook to disability-proof significant memoranda for Government and it will 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.

It would be worthwhile linking the Sectoral Plan to this new process.

8. Are the compliance and redress procedures in the Plan satisfactory? Have you any suggestions for improvements?

The National Disability Authority welcomes the fact that the Sectoral Plan follows the procedures set out in the Disability Act 2005 and the Ombudsman Act 1980 (as amended).

It is important that the procedures are developed and maintained along the principles of universal design. They should be accessible, transparent and simple to use.

The procedures should be available in multiple formats and the content should be written in Plain English.

9. Does the sustainable transport agenda (includes reducing travel demand by car, promoting fuel efficiency and greater use of public transport) impact on accessibility issues? If so, in what ways and how might the revised Plan deal with them?

The mode of transport that most people use regularly is the private car, as a passenger. The biggest group of people with a disability (64 per cent) use this mode without any difficulty. People with a disability are much less likely to use public transport. The percentages that use public transport range from 24 per cent for commuter trains to 35 per cent for city buses. Most people with a disability who use these modes of transport do so without any difficulty.

Nevertheless, figures from the National Disability Survey 2006 (CSO) shows that 24 per cent of people with a disability either avoid using or have difficulty using public transport for reasons related to accessibility. A similar proportion report service-related reasons, while 10 per cent report information-related reasons. It is likely, then, that people with a disability who have significant difficulty with a mode of transport are more likely to avoid using it, on a regular basis, rather than try to cope with the difficulties they encounter.⁶

It is clear that if long-term alternatives to the private car are to be found then a public transport infrastructure, based on the principles of universal design, will have to be developed.

This infrastructure will have to focus primarily on the availability of easy-to-use transport modes. This will involve:

- The incremental improvements in bus and rail travel
- The increase in the number of accessible taxis and hackneys nationwide
- The licensing of travel clubs and the more efficient use of the various existing demand-led door-to-door services
- If some or all of the above are successfully implemented then both agendas mentioned in Question 9 can flourish side by side.

⁶ Dorothy Watson & Brian Nolan, A Social Portrait of People with Disabilities in Ireland. Dept of Social Protection & ESRI, 2011

10. Does the structure of the present Plan allow for adequate monitoring of progress? If not, what changes do you think should be made to the monitoring procedures? What additional main indicators would you propose?

The NDA welcomes the questionnaire on transport needs and delivery circulated to disability organisations by the Department of Transport, Tourism and Sport, as part of the review of its Sectoral Plan, in order to evaluate the success of the programme to date on making transport more accessible.

It is important that the various modes of public transport are available, accessible and affordable. It is important that this information is available at regular intervals. This information must be tailored to assess where possible the impact on the quality of life of people with disabilities. To monitor progress over time, we need to use data sources that are regularly updated. Most of the outcome measures can be derived from existing data sources such as

- Quarterly National Household Survey (QNHS)
- EU -Survey of Income and Living Conditions (EU-SILC)
- Administrative data sets
- NDA monitoring of the Code of Practice for accessible public services

There are some areas where suitable indicators are not readily available from existing data sources, and where these might need to be supplemented by specific annual surveys.

NDA developed a suggested set of indicators in consultation with the National Disability Strategy Stakeholders' Monitoring Group which were designed to measure progress on the five high level goals of the NDS as originally set out in the Towards 2016.

These high level goals would be 'operationalised' into measurable indicators that would be monitored over time.

PTAC

PTAC has been a progressive forum for the discussion and implementation of accessibility issues since its inception and acquired an important role in providing advice and oversight on the Sectoral Plan to the Minister

NDA supports a fixed agenda item on updates from user groups. While this information is covered in the biannual National Disability Strategy Stakeholder Monitoring Group reports, the business of PTAC would benefit from quarterly updates. Each user group representative could indicate prior to the meeting whether they have any material for this agenda. The material should consist of broad, strategic points that are based on the input from users at their respective meetings. The recounting of personal experiences should be confined to the

user group meetings or be facilitated by direct contact between the individual/organisation and the service provider.

The terms of reference might be amended, or Ground Rules for meetings adopted, which would make that explicit.

NDA drew up **Guidelines for Consultation with Disability User Groups under the Sectoral Plan for the Department of Transport** in 2007 and these were later amended and adopted by PTAC. Having fewer, well constructed, evidence-based contributions would enhance PTAC's output and effectiveness.

Tourism and Sport

There are measures contained in sections 31 and 34 of the Disability Act 2005 that allow the Minister for Transport, Tourism and Sport to amend the Sectoral Plan⁷. These could be invoked to allow for the inclusion of material relating to Tourism and Sport; both of which have remained outside of the sectoral plan process to date, yet are very important for people with disabilities with regard to social inclusion and general well-being. Advice could be sought from the Attorney General via the Disability Policy Division in the Dept of Justice and Equality.

In the case of the Marine function transferring to the Department of Agriculture, Marine and Food, NDA believes there is still scope, depending on the wording of the Transfer of Functions Order, for input into PTAC from the relevant officials. This would be the case if there is no obligation on the new host Department to produce a Sectoral Plan.

⁷ <http://www.irishstatutebook.ie/2005/en/act/pub/0014/sec0031.html#sec31>

11. Do you think that the Department's role in the delivery of the Plan is appropriate and adequate? If not what changes to the current administrative arrangements would you suggest?

The National Disability Authority has a long standing history of co-operation and participation with PTAC. Taking this into account, the following suggestions are respectfully made as ones which might help improve the functionality of PTAC and accommodate the Department's recently acquired responsibilities.

PTAC Membership

The Department may wish to consider consulting with the disability organisations – or asking them to agree among themselves - around streamlining their representation on PTAC to mirror the membership of the Disability Stakeholder Group⁸ that monitors the National Disability Strategy at a central level. The six disability umbrella bodies which form the Disability Stakeholder Group constitute the NGO membership of most Departmental committees that monitor the sectoral implementation of the National Disability Strategy. The relevant bodies already sit on PTAC, represent dozens of disability organisations and are well used to advocating on behalf of a wide spectrum of disabilities.

Given the Disability Stakeholder Group's role in sitting across the table from senior officials at the National Disability Strategy Stakeholder Monitoring Group, this would lend itself to a more focused reporting of issues and proposals up the line via the biannual progress reports. This model was adopted by the Commission for Communications Regulation's Forum on Electronic Communications Services for People with Disabilities in 2010, which the NDA co-hosts, whereby each Disability Stakeholder Group member was asked to nominate one representative.

The expanded remit of the Department may well be reflected in a reconstituted PTAC and the membership type proposed above would have the necessary competence to represent people with disabilities across a wider agenda. The Department may wish to consider amending the Terms of Reference or create a sub-committee(s) to deal with Tourism and Sport. Tourism is a more natural fit with Transport as the needs of both are mutually beneficial and these issues could be dealt with by the same members. You might choose to cover sport through these same bodies (complemented by appropriate representation e.g. from the Irish Sports Council, and a representative for the Sports Inclusion Disability Officers from the Local Sports Partnerships) or have a special subcommittee focused on sport.

⁸ Disability Federation of Ireland; People with Disabilities in Ireland Ltd; Not for Profit Business Association; Irish Mental Health Coalition; Inclusion Ireland; National Federation of Voluntary Bodies

Any agreement by disability organisations on reconfiguring their representation would benefit by being matched by a similar gesture from the official side. Their attendance could be guided by the agenda, thus ensuring that only officials from the relevant sections in the Department need attend.

Exchequer funding

Finally, it would be more relevant for the funding set aside each year for accessibility issues, to rest with a reconstituted PTAC, rather than the National Transport Authority. If the latter scenario continued it would be difficult to give consideration to accessibility in relation to tourism and sport. As it stands the current PTAC's area of interest is wider than the statutory remit of the National Transport Authority.

- 12. If you are a person with a disability, have you noted any changes in the accessibility of transport services and the awareness and understanding of transport staff over the past two years? If so, please give examples if you can.**

No observations

- 13. If you work in public transport, have you received any Disability Awareness Training? If so, do you feel that it has helped you do your job better in relation to passengers with disabilities? What form did your training take (e.g. on-line or classroom based and how long did it last (e.g. a couple of hours, one day or more)? Do you have any suggestions for improving the training?**

No observations

- 14. Please let us know if you have other comments:-**
- (a) on the Plan;**
 - (b) on issues of concern for people with disabilities relating to the Plan but not addressed in it, or**
 - (c) about areas for which the Minister has responsibility but are not covered in the Plan.**

Sport and leisure

The HSE's report on Adult Day Services **New Directions** suggests moving from centre based day services, to a model where people with disabilities are supported to participate in mainstream activities in their community. Sports and leisure facilities and programmes can play a big role in moving towards this more inclusive model of support. For example, the work of the Sports Inclusion Disability Officers, and the work of CARA, the Centre for Adapted Physical Activity, is important in opening up opportunities for people with disabilities to participate in sport and physical activities.

Validated Accessible Accommodation

Fáilte Ireland has developed the Validated Accessible Scheme (VAS) for the validation and provision of information on registered and approved accommodation that provides for the needs of people with disabilities.

It is important that the Department encourages the maintenance, development and publication of this scheme to the widest possible audience.

The VAS would also benefit from regular auditing and updating based on feedback from the accommodation providers and their clients.

Vehicle hire for disabled tourists

There are a number of people with disabilities that travel to Ireland looking to hire a vehicle for them to drive or to use as a passenger.

The National Disability Authority recently had referred on a query received by Tourism Ireland about possible car hire for a wheelchair user. The person who made the original query had found that none of the mainstream car hire firms operating in the Republic of Ireland could offer an accessible vehicle for hire.

Fáilte Ireland might wish to discuss with the car hire firms operating in Ireland how they could provide for such customers, either by providing specialised vehicles themselves in their car fleet or by an agency relationship with one of the specialist providers. We note that in the UK, Hertz and Europcar can provide wheelchair-accessible car hire.

There are legal requirements, under the Equal Status Acts 2000 to 2008, to provide goods and services that are accessible to people with disabilities.

Universal design of the built environment

The way we design our cities, neighbourhoods and streets, and our transport systems, are closely interlinked. A sustainable city is one which remains fit for purpose as the population ages, and where services and facilities are within easy reach, including those no longer able to walk for any distance.

The NDA promotes the principles of Universal Design – the design of places, spaces and facilities which can be used by everyone regardless of age, size, ability or disability.

NDA's **Building for Everyone** guidance (www.nda.ie) is being updated to reflect best modern practice and the universal design perspective. The NDA has developed specific guidance on

- Design of the external environment
- Incorporating universal design into physical planning

Given the considerable costs attached to infrastructure projects, making the built environment as easy to use as possible for the maximum amount of people makes financial sense. The building or space in question is future-proofed and the need for expensive and time-consuming retro-fitting is lessened.

Enforcement

With regard to the existing obstacles to be found in our urban areas, the National Disability Authority would welcome the consistent and rigorous application of the existing legislation in relation to vehicles⁹. Monies earned from the prescribed fines could supplement funds available to the Department for all projects.

⁹ S.I. No. 182/1997 — Road Traffic (Traffic and Parking) Regulations, 1997 Fixed Charge Offences from 3 April 2006, <http://www.transport.ie/upload/general/7424-1.pdf>