

NDA submission to National Transport Authority regarding Taxi fares and cashless payment facilities

## May 2022

# Introduction

The National Disability Authority (NDA), as the independent statutory body, provides information and advice to the Government on policy and practice relevant to the lives of persons with disabilities. We have a role to assist the Minister for Children, Equality, Disability, Integration and Youth in the co-ordination of disability policy. We work through our [Centre for Excellence in Universal Design](http://universaldesign.ie/) to promote the universal design of the built environment, products, services and information and communication technologies so that they can be easily accessed, understood and used by everyone, including persons with disabilities.

The NDA wishes to make a submission with regards to the proposed maximum fare increase tariff and the cashless payment guidelines due for publication by the National Transport Authority (NTA).

# Importance of transport for persons with disabilities

The importance of integrated universally designed public transport services that include the built environment and information and communication technologies is underpinned by **Article 9 of the UN Convention on the Rights of Persons with Disabilities**. Ireland ratified the UN Convention in 2018. Article 9 states that in order for persons with disabilities to live independently and fully participate in all aspects of life, they need to have access not only to accessible transportation but also to the wider infrastructure, the built environment, information and communication processes and technologies and to other public facilities and services.

Section 6.3 of the **National Planning Framework for Project Ireland 2040** also identifies universally designed transport services, in addition to housing, education, and health services, as key areas that need to be developed to facilitate the development and progression of diverse and inclusive communities. [[1]](#footnote-2)

The importance of transport in the lives of persons with disabilities and the necessity for transport services that are accessible to everyone is also highlighted in **The Comprehensive Employment Strategy 2015 – 2024**; **National Disability Inclusion Strategy 2017 – 2021**.

# Maximum fare increases

The NDA notes that the NTA is proposing that the 2022 Maximum Fare increase is 12%to reflect the increase in operating costs faced by taxi drivers as per the change in the TCI, together with the introduction of cashless payment facility mandate. The NDA notes that persons with disabilities can be particularly at risk of poverty and deprivation [[2]](#footnote-3). Additionally, the 2021 Indecon survey on the Cost of Disability in Ireland found that households spend, on average, an additional €9,027 on costs of items specifically related to disability, special versions of products, and transport and mobility[[3]](#footnote-4). This study found that overall, there are significant additional costs faced by individuals with a disability which are currently not met by existing programmes or by social welfare payments and that actual costs faced by individuals will severe disabilities on average range from €9,600 - €12,300 per annum and for those with limited disabilities from €8,700 - €10,000 per annum[[4]](#footnote-5). Therefore, taxi fare increases may negatively impact persons with disabilities more than other groups in society.

We would strongly encourage further consultation with disabled persons organisations (DPOs) and persons with disabilities on the matter of taxi fares. In the absence of the mobility allowance, this increase in fares may result in increased social isolation, deprivation, and health impacts for persons with disabilities in Ireland.

The NDA advises that clear and universally designed communication on this matter is key. All information (written, spoken, signed and digital) delivered by a public transport services provider (which includes consultation information), should be universally designed. The NDA suggests thatthe NTA should usethe[**Customer Communications Toolkit for the Public Service - A Universal Design Approach**](https://universaldesign.ie/products-services/customer-communications-toolkit-for-the-public-service-a-universal-design-approach/) which will help to produce universally designed written, verbal and digital communications that can be easily accessed, understood and used by everyone.

# Requirements for payment and self-service terminals

No information is provided about the specifications of the payment terminals to be used in taxis, but the NDA advises the following points. It should be noted that terminals which are touch screen only are not accessible for some people with disabilities and older people and may lead to them being unable to confirm the fare to be paid at the terminal or to expedite payment in the absence of any kind of tactile interface. The NDA would like to stress that the NTA should make use of payment terminals which have been designed with accessibility in mind. Some examples of the features which should be incorporated into payment terminals in order to ensure their use by the widest range of people possible include, but are not limited to:

* The provision of a tactile overlay to aid people with disabilities to locate and interact with the keyboard
* The provision of appropriate fonts and/or typography to ensure that the information can be clearly read
* The provision of auditory (voice and/or non-speech audio), as well as haptic feedback to aid in use of the device.

Further technical accessibility requirements can be found in the EN 301549 harmonised standard.[[5]](#footnote-6)

The NDA advises extensive consultation with disabled persons organisations (DPOs) and persons with disabilities on the accessibility of payment terminals. Further, the NDA recommends that use of accessible payment terminals should be mandatory in all cases.

The NDA also wishes to emphasise that drivers must still have the facilities to accept cash payments. It is not detailed in the document whether drivers will still be required to take cash payments as well as to accept cashless payment, but this will be vital so as not to disadvantage people with disabilities, older people or others who may be unable to use a payment terminal. Many older people rely on cash as their default way of paying and some do not have bank accounts or bank cards[[6]](#footnote-7) and some people with disabilities may prefer this method over using an unfamiliar method of payment.

The NDA advises that the NTA will need to take account of the European Accessibility Directive (EU) 2019/882, on the Accessibility Requirements for Products and Services (European Accessibility Act). Member states are obliged to transpose the European Accessibility Act (EAA) into national legislation by 28th June 2022 with implementation commencing from June 2025. Accessibility requirements are binding on public administration organisations **and** the private sector, that is, anyone who produces or provides products or services falling within the scope of the EAA. From 28 June 2025 the legislation will apply to a wide range of products and services, including Payment terminals and certain self-service terminals such as ATMs. It is important that the proposed Guidelines for the Acceptance of Cashless Payments in Taxis and corresponding requirements are aligned with the requirements set out by the EAA to ensure the greatest possible accessibility and to avoid the need for retrofitting in future.

Further to this, the NDA would like to remind the NTA that Section 27 of the Disability Act, 2005 requires the head of a public body to ensure that services provided and goods supplied to the public body are accessible to people with disabilities, unless that would not be practicable, would be too expensive, or would cause an unreasonable delay. [[7]](#footnote-8) As such the [Code of Practice on Accessible Public Services and Information provided by Public Bodies](https://nda.ie/Good-practice/Codes-of-Practice/Code-of-Practice-on-Accessibility-of-Public-Services-and-Information-Provided-by-Public-Bodies-/Code-of-Practice-on-Accessibility-of-Public-Services-and-Information-Provided-by-Public-Bodies.pdf) highlights that procurers in public bodies should highlight accessibility "as a criterion to be considered throughout the entire tendering process (from drawing up and running tender competitions through tender evaluation and placing the contract to final debriefing)".

It is also worth noting that the EAA contains a legal obligation for procurement of accessible ICTs including payment and self-service terminals as well as websites and mobile applications. The [Public Procurement Directives](https://ec.europa.eu/environment/gpp/eu_public_directives_en.htm) were updated in 2014 to require public services to procure ICT products under the specifications outlined in EN 301 549. The new Directives contain a significantly stronger focus on the use of public procurement to achieve social gains. Accessibility is arguably one of the strongest social considerations within the text of the new Directives, however the NDA wishes to emphasise that accessibility features in ICT benefit everyone, not just persons with disabilities. Therefore, public procurers may justify inclusion of accessibility requirements on the grounds that it improves the quality of the product or service overall.

It must be noted that Article 42 on Technical Specifications under the updated Public Procurement Directives significantly strengthens the obligations of public bodies except in ‘duly justified cases’ to take into account accessibility criteria for persons with disabilities or design for all users. This is perhaps the most significant development in the updated directives as it requires all public bodies to include accessibility as a mandatory requirement in the public procurement of all goods and services for use by people, be they members of the public or employees of the government.

Additionally, under the Web Accessibility Directive, the procurement and development of public websites and mobile apps must comply with relevant clauses of EN 301 549 v3.2.1 (which is equivalent to WCAG 21. AA).

To assist the NTA in meeting these requirement the NDA recommends communication and consultation with persons with disabilities and older people to determine their needs with regards to any changes to booking and payment infrastructure. This will ensure that payment infrastructure takes a universal design approach, which will mean a payment structure and mechanism that is easy to access, easy to understand and easy to use for everyone, including persons with disabilities and older people.

# Conclusion

Transport plays a crucial role in empowering 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.[[8]](#footnote-9) About one in six people with a disability are 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.[[9]](#footnote-10)

In this context therefore, the NDA advises that the NTA should adopt and implement a Universal Design approach when engaging with the public on taxi fare changes and cashless payment services. The NDA advises that the NTA must also be aware of requirements with regards to the procurement and provision of services.

The NDA is happy to meet with the NTA to discuss this submission. The NDA is looking forward to continuing to work with the NTA to develop and implement integrated universally designed transport services.

1. Scheme 2040 is the Government’s long-term strategy to make Ireland a better country for all of its people by investing in its public infrastructure. [↑](#footnote-ref-2)
2. <https://www.cso.ie/en/releasesandpublications/ep/p-silc/surveyonincomeandlivingconditionssilc2018/povertyanddeprivation/> [↑](#footnote-ref-3)
3. [206636\_f8e1b2af-af48-442b-9ca0-aff9efd35bd7.pdf](file:///H%3A%5CDownloads%5C206636_f8e1b2af-af48-442b-9ca0-aff9efd35bd7.pdf) [↑](#footnote-ref-4)
4. [206636\_f8e1b2af-af48-442b-9ca0-aff9efd35bd7.pdf](file:///H%3A%5CDownloads%5C206636_f8e1b2af-af48-442b-9ca0-aff9efd35bd7.pdf) [↑](#footnote-ref-5)
5. <https://www.etsi.org/deliver/etsi_en/301500_301599/301549/03.02.01_60/en_301549v030201p.pdf> [↑](#footnote-ref-6)
6. [What do older people think about access to cash? | Discover | Age UK](https://www.ageuk.org.uk/discover/2021/june/what-do-older-people-think-about-access-to-cash/) [↑](#footnote-ref-7)
7. <https://www.irishstatutebook.ie/eli/2005/act/14/enacted/en/html> [↑](#footnote-ref-8)
8. National Disability Survey (2006) Vol. 2, Table 7.30 [↑](#footnote-ref-9)
9. National Disability Survey (2006) Vol. 2, Table 7.30 [↑](#footnote-ref-10)