Introduction

The National Disability Authority welcomes the opportunity to submit views on the revision of the Statement of Strategy of the Department of Transport, Tourism and Sport. The National Disability Authority is the independent state body providing expert advice on disability policy and practice to the government and the wider public sector, and promoting Universal Design in Ireland. We work closely with your Department and other Departments to provide relevant advice and guidance on disability matters. We have a strong track record of working closely with your Department and relevant agencies on disability issues.

The functions of this Department have considerable impact on the lives of people with disabilities. Transport is a key enabling function for community participation for people with disabilities and older people. Transport to get to work is essential in ensuring that people with disabilities can be fully active. 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. It is important that the Department recognises that people with disabilities are a significant element of the public it serves, and ensures that policies, services and procedures reflect this. The Department’s role in supporting the Comprehensive Employment Strategy for people with disabilities should be noted in the Statement of Strategy. The eleven actions assigned to the National Transport Authority under “Strategic Priority 2 - Provide bridges and supports into work” should be included in the Statement of Strategy. This will support the Government and Department objectives on economic recovery and job creation.

In the past, considerable progress has been made in investing in accessible vehicles and facilities. It is important that these developments are continued and expanded to ensure that the maximum return on investment is achieved. For example, most Bus Eireann coaches have a wheelchair lift, but most coach stops cannot accommodate these lifts. The maximum return on the significant investment in these coaches is therefore not being realised.

A clear strategic commitment on the importance of reaching people with disabilities and older people would ensure that these issues get appropriate priority over the coming years, going beyond the narrow reference to ‘mobility impaired persons’ in the current Statement of Strategy. This commitment should cover all disability types; physical, sensory, intellectual and mental health. It should go beyond investment in infrastructure and include access to information.
(websites, apps, publications) and operational issues such as staff training and equipment maintenance.

**Cross Cutting Issues**

There are a number of strategic cross-cutting issues which span various aspects of the Department’s functions.

**Disability Impact Assessments**

The National Disability Authority encourages the Department to make use of Disability Impact Assessments 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.

**Governance**

The NDA recommends the inclusion of appropriate objectives and actions in relation to disability in the Statement of Strategy including a reference to the Department’s commitments under the National Disability Inclusion Plan.

In relation to your Department’s corporate services function, the NDA would welcome inclusion of explicit commitments to ensure accessibility of the Department’s services, information and public premises to people with disabilities, and to procurement of accessible goods and services, as required under sections 25-28 of the Disability Act 2005.

The NDA is pleased to note the Department’s record on promoting and supporting the employment of people with disabilities where it exceeds the 3% target. We advise that it will be important to continue maintaining compliance with Part 5 of the Disability Act 2005 as a key focus of the Department’s HR strategy. Achieving the target should be an explicit objective in workforce planning for the Department and all agencies.

While good progress has been made towards the National Disability Strategy goals in some areas, a broader, reinvigorated focus is required to ensure that goals will be achieved across all aspects of the Department’s operations and activities. We acknowledge the Department’s track record in successful engagement with the disability sector on particular programmes. We recommend
that a Governance approach is taken across all divisions and sections of the Department, and all public bodies within the Department, including:

- 3 or 4 regular meetings of the Department’s Accessibility Advisory Committee would take place each year. The last AAC meeting took place in November 2015, prior to changes of roles for some of the staff involved.
- The Department would set out expectations to each division and each public body as part of normal governance processes. These would include compliance with legal obligations under Part 3 and Part 5 of the Disability Act 2005, and report of progress on the National Disability Strategy.
- Each business plan or workplan or other annual plan of each division in the Department and each public body under the Department will include a section that sets out future activities under the National Disability Strategy.
- The Annual Report or equivalent for each public body under the aegis of the Department will include a section that sets out key metrics, under the National Disability Strategy (transport facilities accessible to all, sports facilities accessible to all, staff trained in Disability Equality, number of access officers, number of tenders that included accessibility criteria).
- The Department would consult with the Accessibility Advisory Committee each year about the priorities to drive the annual accessibility budget.

**Joined Up Government across all Departments**

There are a number of aspects of the Department’s role that require cross-departmental cooperation to achieve success.

**National Disability Inclusion Plan**

We acknowledge the work that has been done to date in supporting the development of this plan by the Department of Justice and Equality. We recommend that the Department’s objectives and actions under this plan are included in the overall Statement of Strategy to ensure that these get appropriate priority in the coming years.

**Roads and streets**

Accessible roads and streets are an essential part of ensuring people with disabilities, older people and parents with small children can partake in community life and get to where they want to go. Delivery of this objective involves collaboration between local authorities which maintain and repair streets, Transport Infrastructure Ireland and the Department of Housing, Planning, Community and Local Government.
The National Disability Authority has worked closely in the past with the Department, the LGMA and local authorities on this matter, resulting in the publication of Roads and Street Design for All by the LMGA. The National Disability Authority 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.

Staff from the Department contributed to the development of "Shared Space, Shared Surfaces and Home Zones from a Universal Design Approach for the Urban Environment in Ireland" publication. The NDA would welcome the opportunity to collaborate with the Department and other stakeholders on a pilot trial of Shared Space in Ireland in the near future.

**Accessible coach stops**

70% of Bus Eireann’s coach fleet is now wheelchair accessible, with a built-in lift allowing wheelchair users to be lifted on and off the coach. Bus Eireann started buying accessible coaches almost ten years ago.

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

We acknowledge 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. We would welcome a strategic commitment to engage with local authorities on the provision of accessible coach stops in strategic locations that would facilitate people with disabilities transferring to the accessible coach fleet.

**Dept Health / HSE funding of transport for service providers**

Traditionally, part of the HSE funding for residential and day services provided by disability service providers has included funding for transport services – usually mini-bus style services for whom public transport would not be usable or available. There have been some moves to withdraw or restrict this funding as part of the change in policy to bring people with disabilities more into mainstream community settings and services. Cross-departmental engagement will be required to ensure that any changes to this funding model does not result in people with disabilities being restricted from community participation.
Views on current Statement of Strategy

Accessibility and Equality
We recommend that the Department include an explicit commitment to equality within the mission or values of the Department to ensure that all people regardless of age, size, ability or disability get equal access to the services and functions of the Department. This should go beyond the current narrow focus on people with mobility impairments and should include a commitment to a Universal Design approach in the development of new facilities and services.

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 on services provided by private operators either licensed by the Department/NTA 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. The NDA recommends that accessibility for everybody, regardless of age, size, ability or disability would be an important criteria in all licensed or outsourced services. This would apply across all modes of travel – air, sea, road, rail and tram.

End to End Trips
Considerable progress has been made in recent years in improving access to a range of public transport services. This has left some significant gaps which make it difficult for some people to complete their journey. It is important to have accessible train stations, but it is also important that transport connections to that station are also accessible. It is important that websites and apps are designed to be accessible to everybody. It is important that staff are trained to recognise and accommodate the additional needs of people with disabilities and other vulnerable groups.

We would recommend a focus on the end-to-end experience of the transport user as a basis for prioritising future investment and developments. This would ensure that issues such as staff training, websites, apps and operational procedures would be addressed. For example, we have seen a number of incidents where wheelchair users were unable to get on or off a train because there was no staff available to bring the portable ramp to the platform. It is important that such issues are addressed to ensure that the entire service is actually usable for the widest possible audience.

The NDA has just started a project to design and develop a monitoring approach and tools for monitoring accessibility of public transport. We would welcome
further engagement from the Department and key agencies on this important project to monitor accessibility in an objective manner.

**Sport**

Sport plays an important role in enabling inclusion, well-being and community engagement for many people, including people with disabilities. As Government policy brings people with disabilities out of residential institutions and segregated services to live in the community, sports policy should have clear objectives to enable engagement and participation for people with disabilities. This would require cross-departmental engagement with the Department of Health and the HSE on the Transforming Lives and New Directions programmes. Further co-operation may also be required with the Department of Housing, Planning, Community and Local Government and Pobal in relation to community development.

The Department has a key role in funding National Sports Organisations and key infrastructural developments. Universal Design should be a key criteria for all new sports facilities funded by the Department. This will ensure that these facilities are safe and easy to use for everybody, and will avoid expensive retrofit costs in the future. Larger facilities should include a ‘Changing Places’ bathroom to ensure that adults who require a hoist and changing bench can use the venue. Operational funding should also require equal access for people with disabilities in sports participation, and access to training and events.

**Tourism**

The National Disability Authority has had a considerable focus on the tourism sector in recent years. The Centre for Excellence in Universal Design has produced the "Universal Design for Customer Engagement Toolkit" which provides comprehensive best practice guidance on achieving better customer communication. This toolkit will help tourism providers to ensure that their communications can reach all customers, regardless of age, ability or disability. This is not just about people with disabilities. The toolkit enables providers to reach older customers (an important customer segment), people with disabilities, their families and friends – a significant proportion of the overall market.

The toolkit has been piloted with a number of Irish service providers – Viking Splash Tour, Jury’s Hotels, Clew Bay Hotel, Purty Loft Kitchen – who all achieved positive business results (increased sales, reduced complaints) after applying the toolkit to their business. It has also been used by Visit England and Visit Scotland to help improve access to tourism facilities overseas.

The NDA is currently engaged with Fáilte Ireland to embed the toolkit as part of their regular training of tourism providers. We would welcome the opportunity
to engage with the Department at a strategic level to see how this toolkit can contribute to the development of Ireland's tourism facilities. We would also appreciate engagement about the actions for the Department and Fáilte Ireland under the cross-departmental Smart Aging strategy.

Summary

The National Disability Authority recognises the considerable progress made by the Department over recent years to work towards full participation in society for people with disabilities. This submission has set out priority areas for attention over the period of the revised Strategy Statement.

The National Disability Authority is available to continue to work with various areas of the Department to guide on Disability and Universal Design issues, and has a range of resources that can be of assistance, including:

- Online Disability Equality Training – short eLearning module to help staff to serve customers with disabilities – already used by some local authorities – free to public bodies
- Building For Everyone, a Universal Design Approach - 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
- "Universal Design for Customer Engagement Toolkit" - comprehensive best practice guidance on achieving better customer communication