Submission to the Department of Transport, Tourism and Sport regarding its Statement of Strategy 2017 - 2019

5 August 2016
Introduction
NCBI is the national sight loss organisation. We provide practical and emotional support, rehabilitation and customised training designed to help people with sight loss to live independently.

We welcome the opportunity to make a contribution to the Department’s Statement of Strategy 2017-2019 as a means to ensure that the needs of people with sight loss are considered across the range of the Department’s responsibilities.

Universal Design – Access for All
NCBI endorses the Universal Design approach which is promoted by the National Disability Authority and would like the Department to take this approach in its Statement of Strategy 2017-2019. If we design and plan for people with disabilities, those without disabilities are not excluded – whereas designing for those without disabilities excludes very many people.

Transport
Driving a car is a travel option that is not available to people with sight loss. Therefore, the adequate provision of an integrated accessible public transport service is one of the most significant factors that impacts on the quality of life of people with sight loss.
NCBI is pleased that the Government has committed in its Programme for a Partnership Government (May 2016) to “invest to make public transport services more accessible for people with disabilities. Examples of such investment include increased wheelchair access to bus and train stations, bus fleet enhancement and audio announcements on train and bus services, to aid the visually impaired”.

In order to implement this commitment, NCBI advises the Department to include the following in its Statement of Strategy:

(a) information about transport should be accessible, whether on paper, on websites, or at stations / stops; (currently audible announcements are available but not reliable on the DART or bus services);

(b) buildings and stations / stops should be made accessible (easy to find and identify), and in the case of stations, easy orientation and safe mobility;

(c) routes to and from stations and stops should be easy and safe to use. This would include good surfaces on footpaths and the provision of accessible pedestrian crossings where necessary;

(d) tickets, ticket machines / readers and barriers should be accessible;

(e) vehicles should be accessible;

(f) staff whose customer service reflects good quality disability awareness training.

The Department should also make public funding of transport services conditional on compliance with accessibility standards. Where funding has been allocated to specific access features, the use and up keep of these features should be monitored on a continuous bases. Castle kerbs at bus stops are a case in point – significant investment was made and drivers continue to pull up away from the kerb or at an angle that renders them ineffective. The result is that many older people and people with mobility difficulties have no option but to alight from the bus onto the road adjacent to the “castle kerb”. Audio announcements, not working, being switched off or being out of sync, is another case in point where monitoring linked with funding would make a significant difference.
Accessible tourism depends for its business on the accessibility of the public transport system. Improvements to make transport more accessible will also make accessible tourism possible.

**Tourism**

NCBI recommends that the Department commit to making all tourist facilities, which receive state funding, accessible. We are advising the Department to include of the following in its Statement of Strategy:

Accessible tourism requires:

(a) accessible information available at each premises, cultural centre, museum, gallery and exhibition, as well as at tourist offices;

(b) accessible websites - in particular the Failte Ireland website and the Discover Ireland website;

(c) accessible premises – hotels, B&B’s, restaurants, visitor centres;

(d) accessible coaches fully compliant with the European bus and coach directive;

(e) accessible and readily available taxis for tourists;

(f) staff whose customer service reflects good quality disability awareness training.

All Tourism Policy Statements and Tourism Strategies and Action Plans produced by the Department should commit to making tourism accessible to people with disabilities.

**Sport**

Making sport accessible to people with sight loss provides obvious physical and social benefits. NCBI advises the Department to include the following in its Statement of Strategy:

For sport to be accessible for people with impaired vision, the following should be provided:

(a) staff should receive good quality disability awareness training, specific to sport;

(b) accessible (and easy-to-find) information about facilities should be made available;

(c) websites should meet accessibility standards;
(d) swimming pools, sports and recreation centres should be accessible;

(e) public transport and pedestrian crossings, en-route to and from swimming pools and sports centres, should be accessible.

(f) Access to sport should include spectating as well as participation.

The Department should also make state funding for sports facilities dependent on those facilities being made accessible to everyone, including people with disabilities. The Department should also promote the development of guidelines on accessibility standards for privately funded sports facilities.

**The Department’s own Facilities**

The Department should commit in its Statement for Strategy to making its own services, information, website and public premises accessible to everyone including people with disabilities and to the procurement of accessible goods and services, under the Disability Act 2005.

**Electric Vehicles**

In "A Programme for a Partnership Government" (May 2016) the Government states that it "want(s) Ireland to become a leader in the take-up of electric vehicles. We will establish a dedicated taskforce involving relevant government departments, agencies, industry and representative groups, to work on this goal and to set ambitious and achievable targets". NCBI expects to be invited to participate in this taskforce and will be advocating for Alert Vehicular Acoustic Systems (AVAS) that cannot be switched off.

**Consultation with Representative Bodies**

NCBI recommends that the Department commit in its Statement of Strategy to consult with representative bodies (such as NCBI) as key stakeholders.
More Information
NCBI would be more than happy to advise the Department in more detail on each of these issues, upon request.

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