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Proposals for the Development and Coordination of Enhanced Transport and Mobility Support Options for People with Disabilities

National Disability Inclusion Strategy

Action 104 Transport Working Group

Final Report

December 2022

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1. Context

1.1 Purpose of Report

This Report is the final output of the Transport Working Group established under the National Disability Inclusion Strategy 2017-2022 to advance Action 104 therein.

The purpose of this report is to convey proposals from the Transport Working Group for the development and coordination of enhanced transport and mobility support options for people with disabilities.

A prior draft of the Report was discussed at the fourth and final meeting of the Transport Working Group on 8 December 2022. To finalise this Report, a summary of the discussion has been inserted into the conclusion section.

1.2 Background

The Transport Working Group was established in 2020 to achieve progress under Action 104 of the National Disability Inclusion Strategy.

Action 104 contains a commitment for a number of Departments and Agencies to:

“lead a review of transport supports encompassing 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 and [to] develop proposals for development of a coordinated plan for such provision. This plan will have regard to making the most efficient use of available transport resources.”

Action 104 was developed from a recommendation in the Make Work Pay Report 2017. The Make Work Pay Report 2017 found that: “while there are several transport supports available for persons with disabilities, responsibility for administering these supports is spread across a number of Government Departments and Agencies with differing qualification criteria. Some people who have significant transport needs, could, if they were to work, fall between different schemes of supports. Others may find their entitlement difficult to understand or navigate.”

To address this issue, the Make Work Pay Report 2017 contains an action to:

“Undertake a review of transport supports encompassing 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, and to make proposals for development of a coordinated plan for such provision. This Plan should have regard to making the most efficient use of all available transport resources.”

This action was included in the National Disability Inclusion Strategy, for progression during the lifetime of this strategy (2017-2021, extended to 2022 due to extenuating circumstances arising from the Government's response to the Covid-19 pandemic).

There are a number of departments and agencies with responsibility for transport and mobility schemes represented on the Transport Working Group, and they include the Department of Finance, Department of Social Protection, Department of Health, Department of Transport, the Health Service Executive, and the National Transport Authority.

Representatives of the Disability Stakeholder Group also attend and participate in TWG meetings. The Department of Children, Equality, Disability, Integration, and Youth had no policy, legislative, or operational responsibility for any transport or mobility schemes for the duration of the Working Group's work, and so were involved in the Transport Working Group in a coordination function and as an extension of the Department's role as Secretariat to the National Disability Inclusion Strategy. The National Disability Authority also attend and participate in the Transport Working Group.

While the Make Work Pay recommendation which directly informed the scope of Action 104 was employment focused, it was agreed by the Transport Working Group in January 2022 that the scope of the review and proposals required under Action 104 needed to be more broadly conceived. For that reason, from January 2022 onwards a holistic approach was taken in considering State-funded transport and mobility supports with the aim of informing next steps capable of enhancing such provision in relation to transport and mobility requirements in all facets of life (e.g. supporting access to healthcare, education, cultural life, and participation in society more generally), not solely in relation to access to employment.

1.3 Transport Working Group Meetings

The first meeting of the Transport Working Group took place on 4 March 2020 and in it the aims and scope of the Transport Working Group were discussed. The work of the group was paused for a time as a result of the exigencies demanded by all Departments in responding to the Covid-19 pandemic.

From January 2022 onwards, in resuming its work, the Minister of State with responsibility for Disability, Anne Rabbitte, assumed chairship of the Transport Working Group. At the Transport Working Group's second meeting on 26 January 2022, the Group discussed several key mobility and transport schemes including the Disabled Drivers and Disabled Passengers Scheme. The main output of the meeting was an agreement to undertake a stocktaking exercise of all State-funded mobility and transport schemes. This stocktake was intended to fulfil the 'review' element of Action 104. Further detail on the Stocktaking Report is included below.

The third meeting of the Transport Working Group took place on 6 September 2022. At this meeting, presentations on relevant transport and mobility schemes included in the Stocktaking Report were made by the following Working Group members:

- Department of Finance
- Revenue Commissioners
- Department of Health
- Health Service Executive
- Department of Social Protection
- National Transport Authority

It was agreed at the 6 September 2022 meeting that the final output of the Transport Working Group to complete Action 104 would be a report containing proposals from members of the Group. This present report represents that final output of the Transport Working Group.

At the fourth and final meeting of the Transport Working Group on 8 December 2022, the Group discussed a previous draft of this report and a summary of the discussion has been captured in the conclusion section to this report to finalise it.

1.4 Summary of Transport Working Group Outputs

1.4.1 Stocktaking Report

At the January 2022 meeting of the Transport Working Group, it was agreed that a stocktaking exercise of relevant transport and mobility schemes should be undertaken to fulfil the 'review' requirement in Action 104, and to inform next steps in relation to the development of proposals to complete Action 104.

The Department of Children, Equality, Disability, Integration, and Youth undertook to collate responses from Government departments and agencies with responsibility for transport and mobility schemes within the scope of Action 104 represented on the Transport Working Group.

In preparing the Stocktaking Report, departments and agencies were requested to provide information in relation to transport and mobility schemes such as:

- Who can avail of the scheme?
- What is the geographic scope of the scheme?
- Does the scheme support personal mobility or mobility generally?
- Is the scheme targeted towards a particular group(s)?

The following Departments and Agencies returned information in relation to the schemes listed below for inclusion in the Stocktaking Report:

- Department of Finance
 - Disabled Drivers and Disabled Passengers Scheme
 - Fuel Grant Scheme
- Department of Health / HSE

- Mobility Allowance Scheme
- HSE-funded Disability Service Provider Transport
- Vehicles for HSE-funded Respite and Residential Services
- Department of Transport / NTA
 - Travel Assistance Scheme
 - NCBI Wayfinding Centre
- Department of Social Protection
 - Free Travel Scheme

The Stocktaking Report contains a summary, prepared by the Department of Children, Equality, Disability, Integration, and Youth, of the information submitted by relevant Government departments and agencies as part of the stocktaking exercise.

1.4.2 Final Report

At the September 2022 meeting of the Transport Working Group, it was agreed that members of the group would submit written responses containing proposals for next steps in relation to the development of enhanced options for transport and mobility supports, as required by Action 104, for inclusion in a final report. This present report is the final report of the Transport Working Group.

The following three questions were formulated by the Department of Children, Equality, Disability, Integration and Youth to structure responses for the purposes of developing the final report. The questions were as follows:

- Question 1: What does a successful and viable holistic approach that supports the mobility and transport needs of people with disabilities look like in the Irish context?
- Question 2: What appropriate (i) personal, (ii) community and (iii) public mobility and transport supports are needed to achieve this vision, having regard to making the most efficient use of available transport resources, and how should they connect with each other to create sustainable and reliable networks that support people with disabilities to travel for any purpose on an equal basis with each other and with non-disabled people?
- Question 3: What is an appropriate timeframe in which to achieve the vision described above, and what priority milestones should be achieved in the interim period? Are there any 'quantum leap' proposals that would make substantial progress efficiently and effectively if pursued?

Submissions were received from:

- Department of Finance

- Department of Health
- Department of Social Protection
- Department of Transport
- Health Service Executive
- National Disability Authority
- Three members of the Disability Stakeholder Group: two individuals with a disability, and one a representative of a Disabled Persons Organisation (DPO)
- Irish Wheelchair Association

In addition to the submissions listed above, this final report has also been informed by:

- Notes/Minutes of the Transport Working Group held on 4 March 2020, 26 January 2022, and 6 September 2022
- Stocktaking Report on Government-funded Transport and Mobility Schemes for People with Disabilities (August 2022), prepared by the Department of Children, Equality, Disability, Integration, and Youth, and containing information submitted by relevant Government departments and agencies as part of the stocktaking exercise
- 6 papers submitted by the Department of Finance in relation to the Disabled Drivers and Disabled Passenger Scheme which were prepared to assist the Transport Working Group in their review of Government-funded transport and mobility schemes under Action 104 and which supported their submission to this report
 - Paper 1 - The Disabled Drivers and Disabled Passengers Scheme - Review Context and inputs
 - Paper 2 - The Disabled Drivers and Disabled Passengers Scheme's History and Overview
 - Paper 3 - Barriers to a '21st century' Disabled Drivers and Disabled Passenger Scheme Administrative and Operational Model
 - Paper 4 - The Disabled Drivers and Disabled Passengers Scheme
 - Paper 5 - International Examples non-vehicle related provisions/ wider transport services
 - Paper 6 - Technical Annex Administration and Operation of Disabled Drivers and Disabled Passenger Scheme

As the National Disability Inclusion Strategy 2017-2021 (extended to 2022) concludes at the end of 2022, any recommendations or proposals contained in this report cannot be taken forward through this policy structure, but instead will need to be considered and advanced in 2023 and beyond through alternative policy coordination structures.

1.5 Changing Policy Landscape

It is worth noting the changing nature of policies, services and supports that have taken place in Ireland over the last number of decades since a number of the transport supports and initiatives, referred to in this report, were first introduced. Support schemes, such as the

provisions under what is now known as the Disabled Drivers and Disabled Passengers Scheme were introduced in the 1969 Finance Act; the Motorised Transport Grant was introduced in 1968 and the Mobility Allowance in 1979. These schemes were based very much on a medical model of disability and at a time when there was little if no accessible transport available for people with disabilities.

Some of the key developments that have taken place since and that impact on transport and mobility supports for people with disabilities include:

1.5.1 Commission on the Status of People with Disabilities

The Report of the Commission on the Status of People with Disabilities, at the time it was published, was the cornerstone of future Government policy in the area of disability. Among the key features of this Report were that:

- the Report was shaped by the lived experience of people with disabilities as experts in their own right
- disability is a social issue, not a medical one
- people with a disability are equal citizens of Ireland, then they are equal with each other and that parity of esteem across the range of disabilities is central to the Commission's recommendations

The three guiding principles adopted by the Commission to inform its work were:

- Equality
- Maximising Participation
- Enabling Independence and Choice

The report is in essence an equality strategy which set about removing the barriers which stand in the way of people with disabilities who want to live full and fulfilled lives.

One of the single largest areas of concern raised with the commission was the question of access and transport. The report states:

“Clearly the built environment and most forms of transport are inaccessible for people with disabilities... these problems are not just mechanical ones but ones that have several important consequences. They mean that people are denied full access to education, employment and training, to cultural and leisure events”.
(Minister for Equality Statement - Report of the Commission on the Status of People with Disabilities, Dáil Éireann, 1 May 1997)

1.5.2 Disability Act 2005

- Accessibility of Public Services and Information

In relation to Accessibility of Public Services and Information, Part 3 of the Disability Act 2005 places significant responsibilities on public bodies to make their services accessible to people with disabilities.

Public bodies are required to ensure that their services are accessible for people with disabilities by providing integrated access to mainstream services where practicable and appropriate. (Section 26)

Public bodies are required to ensure that the goods or services they purchase are accessible unless it would not be practicable or justifiable on cost grounds or would result in an unreasonable delay. (Section 27)

Section 28 of the Disability Act 2005 sets out the accessible formats that should be provided, following a request and as far as practicable:

- Communications by a public body to a person with a hearing or visual impairment must be provided in an accessible format
- Information provided electronically must be compatible with adaptive technology
- Published information, relevant to persons with intellectual disabilities, must be made available in easy-to-read formats

To help public bodies meet the requirements set out in the Disability Act 2005, the National Disability Authority prepared a Code of Practice on Accessibility of Public Services and Information Provided by Public Bodies. A revised Code of Practice will be published shortly.

- Sectoral Plans

Part 3 of the Disability Act 2005 also contains provision for the development of Sectoral Plans by six Government departments including Transport.

Transport Access for All, the Transport Sectoral Plan under the Disability Act 2005, was first published in July 2006 and has undergone a number of reviews since then and has been updated regularly taking account of significant changes that have taken place in the provision of accessible transport.

The Plan sets out a series of time bound and measurable targets and a number of policy objectives for making all modes of public transport more accessible. The Plan also promotes the principle of mainstreaming by requiring accessibility to be an integral element of the public transport services. Over the years the Plan has also highlighted the importance of joint working between the Department and other Departments and Agencies in delivering the common goal of accessible public transport as well as an accessible built environment, including

transport infrastructure, roads and the pedestrian environment. The concept of mainstreaming of accessibility extends not just to transport vehicles and infrastructure. It also includes 'softer' transport delivery elements such as staff training in understanding and meeting passenger needs and information provision (both before and during journeys) in forms and formats that can be clearly understood.

Over the years it has been acknowledged that the benefits of improved transport accessibility extend to all transport users, even to the most able-bodied, and issues relating to transport accessibility go far beyond the needs of people with disabilities.

It has also been recognised that some people who, because of the severity or nature of their disabilities, will not be able to travel on public transport services (or may not be able to do so at all times) should be provided for. For this reason, and although currently outside the scope of the Department's Sectoral Plans, door to door services provided by specific community-based transport operators will continue to play an important role in the delivery of accessible services.

1.5.3 UN Convention on the Rights of Persons with Disabilities

The introduction into the human rights landscape of the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD) in 2006, signed by Ireland in 2007 and ratified by Ireland in 2018 is an important milestone and one which sets the context going forward for the development of enhanced transport and mobility supports for people with disabilities. The right contained in the UNCRPD are critical to the delivery of services, moving towards more flexible models of support focussed on greater independence for the individual and enabling them to achieve their full potential in living ordinary lives in ordinary places.

Article 9 of the United Nations Convention on the Rights of Persons with Disabilities 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 infrastructure, the built environment, information and communication processes and technologies and to other public facilities and services.

Article 20 has a specific focus on Personal mobility – ensuring personal mobility with the greatest possible independence for persons with disabilities, in the manner and at the time of their choice and at affordable cost.

Underpinning the development and monitoring of law and policy in relation to transport and mobility supports are critical provisions in the UNCRPD – Articles 4(3), 4(4), and 33(3) - which support the inclusion and participation of people with disabilities, their representative organisations, and civil society more widely.

1.5.4 EU Disability Policy

In pursuing the implementation of the United Nations Convention on the Rights of Persons with Disabilities, the European Commission has published a roadmap to define the scope of a new disability strategy for disability called Union of Equality - Strategy for the Rights of Persons with Disabilities 2021-2030.

The roadmap defined the scope of the new Strategy, stating that the “new Strategy will aim at ensuring the social and economic inclusion and participation of persons with disabilities in society, free from discrimination and in full respect of their rights”.

The initiative also aims to ensure accessibility, mobility, free movement, and access to transport for people with disabilities.

It also states that

- “accessibility to the built and virtual environments, to information and communication technologies (ICT), goods and services, including transport and infrastructure, is an enabler of rights and a prerequisite for the full participation of persons with disabilities on an equal basis with others”
- “Passenger rights guarantee the right to non-discrimination in access to transport and to receive assistance free of charge for passengers with disabilities and reduced mobility travelling by air, rail, maritime means of transport, or bus and coach”

The Commission also committed to review in line with the Sustainable and Smart Mobility Strategy, the passenger rights regulatory framework including rights for persons with disabilities and reduced mobility in transport by air, water, bus and coach.

In addition, obligations in respect of accessibility are set out under the EU Web Accessibility Directive (WAD) and the European Accessibility Act (EAA). Through both, the EU aims to create a more accessible society across Member States, in line with the United Nations Convention on the Rights of Persons with Disabilities.

1.5.5 United Nations Sustainable Development Goals

While all Sustainable Development Goals and targets are applicable to people with disabilities, disability is referenced in various parts of the Sustainable Development Goals and specifically in parts related to education, growth and employment, inequality, accessibility of human settlements, as well as data collection and monitoring of the Sustainable Development Goals. Of particular relevance, with regards to the role of transport for all citizens, are:

- Goal 10 which strives to reduce inequality within and among countries by empowering and promoting the social, economic and political inclusion of all, including persons with disabilities.

- Target 10.2 indicates that by 2030, empower and promote the social, economic and political inclusion of all, irrespective of age, sex, disability, race, ethnicity, origin, religion or economic or other status
- Goal 11 would work to make cities and human settlements inclusive, safe and sustainable. To realize this goal, states are called upon to provide access to safe, affordable, accessible and sustainable transport systems for all, improving road safety, notably by expanding public transport, with special attention to the needs of those in vulnerable situations, such as persons with disabilities. In addition, the goal calls for providing universal access to safe, inclusive and accessible, green and public spaces, particularly for persons with disabilities.
 - Target 11.2 aims that all citizens will have access to safe, affordable, accessible and sustainable transport systems by 2030 by expanding public transport.
 - Target 11.2: By 2030, provide access to safe, affordable, accessible and sustainable transport systems for all, improving road safety, notably by expanding public transport, with special attention to the needs of those in vulnerable situations, women, children, persons with disabilities and older persons.

Indeed the Preamble to the United Nations Convention on the Rights of Persons with Disabilities refers to sustainable development. The UNCRPD was adopted at a point in time that predates the development and adoption of the Sustainable Development Goals, but nonetheless, synergies between both instruments can be drawn.

In Ireland, the National Implementation Plan for the Sustainable Development Goals 2022-2024, Chapter 7 on Sectoral Stakeholder Engagement, outlines that to achieve a disability-inclusive society, it is important to identify and consider the links between the Sustainable Development Goals and the United Nations Convention on the Rights of Persons with Disabilities. It also has an action on the promotion of greater engagement of persons with disabilities with the national stakeholder engagement mechanisms in line with the United Nations Convention on the Rights of Persons with Disabilities.

2 Summary of Submissions

This section contains a summary of the responses to the three questions asked of Transport Working Group members to inform a final report from the Working Group containing proposals for the development of enhanced options for transport and mobility supports.

As is evident from the responses submitted there are a range of issues that are deemed necessary for a successful and viable holistic approach and the need for a comprehensive and co-ordinated cross Government approach which advances a joined-up approach to the transport and mobility supports required for people with disabilities. The diversity of views submitted in this regard are summarised in the sub-sections below.

2.1 Vision to be Achieved

Question 1: What does a successful and viable holistic approach that supports the mobility and transport needs of people with disabilities look like in the Irish context?

A holistic and viable approach that supports the mobility and transport needs of people with disabilities is one that:

- delivers to the requirements as set out in Article 9 of the United Nations Convention on the Rights of Persons with Disabilities
- enables persons with disabilities to live independently and participate fully in all aspects of life, States Parties shall take appropriate measures to ensure to persons with disabilities access, on an equal basis with others, to the physical environment, to transportation, to information and communications, including information and communications technologies and systems, and to other facilities and services open or provided to the public, both in urban and in rural areas
- consults and actively involves persons with disabilities in the development and implementation of legislation and policy and other decision-making processes as set out in Articles 4(3), 4(4) and 33(3) of the United Nations Convention on the Rights of Persons with Disabilities
- encompasses a whole of government and ‘mainstream first’ approach to the provision of transport and mobility supports to meet the independent living needs of people with disabilities
- is underpinned by a coherent national policy on transport and mobility supports for people with disabilities
- includes numerous transport/mobility options to meet a wide range of different needs, such as a mix of universal and targeted transport/mobility options, from personal options to community-level options and options within existing networks/infrastructure
- facilitates improved; more effective; more timely; more equitable transport and mobility outcomes for all individuals

- ensures the focus of policy, planning and transport provision is on the customer's end to end journey
- takes a universal design approach to all elements of a person's journey; from journey planning, to getting to public transport stops and stations, ticketing and fares, getting on public transport, on board information, getting off public transport and leaving the terminus. A universal design approach not only assists with mainstream policies and services– in line with the government commitment to equality, diversity and inclusion, but improves access and usability for all
- addresses gaps especially in community-level transport and mobility supports, through re-configuration and/or extension of existing supports
- ensures people with a disability can actively move through an enabling environment for the purposes of full participation in society
- offers mobility supports that are transparent, fair, comprehensible, effective, efficient and are value for money
- provides a co-ordinated transport system encompassing private, community and public modes of transport, that is timely, accessible, affordable and easy to use
- functions efficiently, effectively and sustainably as a transport system and is provided equitably across different geographic regions; and is available as and when individuals require it

2.2 Action Required

Question 2: What appropriate (i) personal, (ii) community and (iii) public mobility and transport supports are needed to achieve this vision, having regard to making the most efficient use of available transport resources, and how should they connect with each other to create sustainable and reliable networks that support people with disabilities to travel for any purpose on an equal basis with each other and with non-disabled people?

This section contains a summary of the issues raised by respondents to the above question. These have been grouped into 3 sections:

2.2.1 Mobility Supports which focus primarily on available personal financial schemes and costs incurred by some people with disabilities in using transport

2.2.2 Transport Infrastructure is a summary of respondents' submissions regarding public and community transport. Some highlighted practical issues experienced by people with disabilities in using some of the current transport system. Others highlighted the need for more integrated approach; the importance of a whole of journey approach; the important role Local Authorities can play have in ensuring an accessible environment and how a Universal Design approach can deliver a transport system for all.

2.2.3 Current Supports which refer to the Travel Assistance Scheme and the development of the Wayfinding Centre.

2.2.1 Mobility Supports

With regards to personal transport and mobility supports, most respondents tended to focus on what financial support is/was available to individuals, and the additional costs incurred by some people with disabilities in using transport. The summary under this sub-section is grouped under the following headings:

- Disabled Drivers and Disabled Passengers Scheme
- Free Travel Scheme
- Mobility Allowance Scheme
- Motorised Transport Grant Scheme
- Cost of Transport

2.2.1.1 *Disabled Drivers and Disabled Passengers Scheme (DDS)*

All of the submissions that referenced the Disabled Drivers and Disabled Passengers Scheme expressed dissatisfaction with the current scheme as designed and implemented. There were divergent views on what should be done with the DDS, as noted below:

- A new needs-based grant-aided vehicular adaptation scheme should replace the Disabled Drivers and Disabled Passengers scheme as it is no longer fit for purpose.
- Is based on a medical model of disability and very much limited in its application as to who is eligible to apply for the scheme
- Is focussed more on those who can afford to buy a car and the majority of people with disabilities on lower incomes can not avail of the scheme
- Was conceived, designed and implemented in the 1960s to cater for the vehicular adaptation needs of a confined cohort of drivers with physical disabilities
- Requires a person to have a Primary Medical Certificate that is received upon assessment from the HSE and that the medical criteria to be eligible for this scheme relies on being severely and permanently disabled.
- The criteria to receive a primary medical certificate should be amended as the current criteria exclude many people who acquire their disability or who may otherwise be precluded from driving, while also being vague in defining areas such as dwarfism.
- Should be extended to include other types of disability and the cost of maintenance and servicing of adapted vehicles
- The need for engagement with people with disabilities and other stakeholders like the Irish Hospital Consultants Association on setting criteria for the scheme

- o The appeal process should be regionalised and not just Dublin based

To inform the Working Group and contribute to its consideration of Government-funded transport and mobility schemes under Action 104, the Department of Finance convened a Criteria Sub-Group to gather information on the experiences, perspectives and expertise of those most involved with the Disabled Drivers and Disabled Passengers Scheme. The Criteria Sub-Group also examined international best practice in respect of vehicle-related provisions. The Criteria Sub-Group concluded that the current scheme as constituted and operated is no longer fit for purpose; it does not meet the needs of a significant group of those with a disability and with mobility impairments; it is significantly divergent from international best practice in almost all scheme aspects examined; it does not and will never operate to the standards expected of a 21st century operational model.

The Department of Finance has submitted materials from the Criteria Sub-Group for consideration as part of the Working Group's examination of supports with a proposal that the Disabled Drivers and Disabled Passengers Scheme should be replaced with a new approach to vehicle-related support, namely a graduated scale of grant-aided direct financial support for specified vehicle adaptations. Both the Minister and the Department of Finance share the CSG's view that the Disabled Drivers and Disabled Passengers Scheme needs to be replaced with a new needs-based, grant-aided vehicular adaptation scheme.

The proposal contains a substantiated evidence base based on international best practice, a policy rationale, and key design principles and parameters to facilitate the development of a new scheme at the earliest possible time. It also indicates that a replacement for the Disabled Drivers and Disabled Passengers Scheme is urgently required. The proposal for a new vehicular adaptation scheme can be pursued independent of, but as a compliment to, the timelines involved in developing a wider range of mobility supports and a range of transport options across Government, including private, community and public transport that cater for the transport needs of people with disabilities.

2.2.1.2 Free Travel Scheme

The Free Travel Scheme provides free travel on the main public and private transport services for those eligible under the scheme. It was never intended as a targeted support for people with severe mobility issues nor to address the transport requirements of all persons with long-term health conditions or disabilities, as it is a social welfare measure rather than a general transport initiative. Nevertheless, it is an important mobility support enabling older people and people living with disabilities, who are in receipt of qualifying social welfare payments, remain active within their community.

The following proposals were made in submissions with regards to the Free Travel Scheme:

- People with disabilities who have a long-term illness card but not a medical card and who do not receive any payments from the Department of Social Protection should have access to the Free Travel Scheme
- The potential for extending the scheme to include children with disabilities; partially sighted people; and neurodivergent people
- Review the accessibility of the card as it can be difficult for a person who is visually impaired to distinguish it from other cards
- The removal of the renewal requirement for vision impaired people who avail of the Free Travel Scheme
- The need for parity between people who avail of the scheme. Currently those who are above 66 years old can travel in the Republic of Ireland and Northern Ireland for free, and those who are below 66 cannot travel in Northern Ireland for free
- The need for the criteria for the companion pass to be reviewed

2.2.1.3 Mobility Allowance Scheme

The Mobility Allowance Scheme was intended to support transport costs for individuals who are unable to walk or to use public transport who satisfied the means test, medical criteria and were aged between 16 and 66 years. The criteria was limited to those with physical mobility issues. The Mobility Allowance Scheme is no longer open to new applicants due to the Government's decision in 2013 on foot of the Ombudsman reports in 2011 and 2012 regarding the legal status of this scheme in the context of the Equal Status Acts. Interim payments have continued to be paid to those who were on the scheme prior to the Government's decision in 2013.

Submissions highlighted:

- The Mobility Allowance scheme, which was stopped in 2013, had good potential to alleviate some of these cost barriers
- It is vital that when a version of the Mobility Allowance scheme is revived, that application processes are fully accessible

2.2.1.4 Motorised Transport Grant

The Motorised Transport Grant Scheme was a means tested HSE payment for people with disabilities who needed to buy a car in order to retain employment. Consideration was also given to people who were unemployed but could take up available work if that a person had a car. In exceptional circumstances a person with severe disabilities living in isolated locations and who could not use public transport would also have been considered for this grant. Like the Mobility Allowance Scheme, the Government made a decision in 2013, on foot of the Ombudsman reports in 2011 and 2012 regarding the legal status of this scheme in the context of the Equal Status Acts, to close this scheme and no further applications were

accepted, including from applicants who may have received a grant in the past. It was intended that an alternative scheme would be devised to replace it.

The following issues were raised in submissions regarding the personal financing of transport for individuals:

- Considering the need of some persons with disabilities to use private transport, the closure of the mobility allowance and the motorised transport grant can significantly impact the ability of persons with disabilities to participate in daily life. Particularly for those who are unable to undertake the first mile/last mile or other elements of their journeys using public transport and active travel. This may preclude them from accessing education and employment as well as from participating in their communities, socialising, and accessing healthcare

2.2.1.5 Cost of Transport

The economic sustainability of transport provision and mobility supports could be interpreted as involving considerations that impact the cost to the:

- person with a disability
- exchequer
- environment

With regards to the cost to a person with a disability a number of submissions highlighted the additional costs incurred because a person had to take a taxi or rely solely on private transport due to the lack of available accessible transport or that they could not use the public transport that is available or that they could not get to or from public transport.

Issues raised by respondents included:

- The need for a direct financial support model such as that seen in Germany and Italy
- Financial support (free/discounted travel, grants, tax relief, cash support) to enable people with disabilities afford to travel, especially where only more expensive forms are feasible. Financial support (free/discounted travel, grants, tax relief, cash support) to enable people with disabilities afford to travel, especially where only more expensive forms are feasible
- Recent taxi fare increases of 12% and the absence of additional grants may negatively impact persons with disabilities more than other groups in society
- Some submissions stated that supports must not be means tested

In the Cost of Disability Report costs relating to mobility and transport were estimated to be over €3,000 a year on average amongst those who indicated a cost in those areas that they could not afford.

The exchequer costs detailed by submissions included:

- Free Travel Scheme - there are approximately 1,043,000 customers with direct eligibility. The estimated expenditure on free travel in 2022 is €95 million
- Mobility Allowance Scheme- as of April 2022 there are 3,325 people in receipt of those interim payments at a cost of €7 million
- Disabled Drivers and Disabled Passenger Scheme (DDS) - provisional data (latest available) on Vat and VRT Relief on DDS is there were 5,737 approved applicants at a cost of €62 million and the estimated fuel grant for 2020 was €9.764 million
- The HSE provided once-off funding of €8 million in late 2021 to support the replacement of aging transport vehicles used by disability service providers.

There is no data available as to the overall recurring cost to the HSE in providing transport support as such costs are built into the operational costs of providing disability services.

There was no information provided in submissions to the Department of Children, Equality, Disability, Integration and Youth on the cost of publicly funded demand responsive door-to-door services which are currently being provided to persons with disabilities. These include door-to-door services being provide by ACTS, Clare Access Transport, Cork Centre for Independent Living, Vantastic. Nor was there information in the submissions regarding the annual cost of providing free motor tax for disabled drivers by Local Authorities. As a result, there are gaps in determining the actual cost to the exchequer in providing current transport and mobility supports to people with disabilities. Such information would be helpful in the context of the proposals as set out in Section 3 below.

There was no commentary with regards to environmental costs or on how more effective co-ordinated integrated accessible transport provision could have positive impacts on the environment, however a discussion on this point took place in the final meeting of the Transport Working Group on 8 December 2022 and that is summarised in the conclusion section below.. Ultimately, a balance between environmental, social, and economic considerations should inform any new policy landscape, given the overall policy context at a national, EU and international level (as outlined above describing the evolution in disability policy in Ireland to date, and in particular in relation to sustainable development).

2.2.2 Transport Infrastructure

This section contains a summary of submissions regarding public and community transport. Some of the submissions highlighted practical issues experienced by people with disabilities in using some of the current transport system. Others highlighted the need for more integrated approaches such as flexible demand responsive local community transport that could link to the main public transport network; the importance of a whole journey approach in achieving an accessible transport infrastructure; the important role Local Authorities have

in ensuring an accessible environment and how critical a Universal Design approach is to deliver a transport system for all.

Submissions highlighted the following:

- Whole of journey approach: This is central to achieving an accessible transport infrastructure and must include all elements of a person's journey; from journey planning, to getting to public transport stops and stations, ticketing and fares, getting on public transport, on board information, getting off public transport and leaving the terminus
- Universal Design: A universal design approach to all elements of a person's journey would not only improve access and usability for all but would also assist with mainstream policies and services– in line with the government commitment to equality, diversity and inclusion
- Local Authorities: Local authorities have a key role to play in ensuring an accessible environment that enables people with disabilities access to transport and also in engaging and participating in daily activities within the community. This includes:
 - Meaningful engagement with people with disabilities on the development of new projects, upgrading infrastructure, such as, pedestrian zones, shared space; cycle lanes that do not encroach on disabled parking spaces; development of infrastructure to support active mobility; provision of accessible public toilets and changing facilities; accessible routes to transport locations etc
 - Using the universally designed walkability developed by the NDA, NTA and Age Friendly Ireland. This would facilitate local authorities examine the infrastructure leading to transport stops and stations and assess the accessibility of the area for those walking, cycling, using a wheelchair, pushing prams, walking with shopping, etc. This audit can assist local authorities in determining where best to use funding for accessible infrastructure improvements
 - Ensure all electric car charging bays are fully accessible
 - Need for the appointment of disability officers in Local Authorities whose primary remit would be engaging with people with disabilities in making local environments accessible
- Active travel is not suitable for everyone and this needs to be recognised and accommodated

Public Transport:

- The statutory remit of the Department of Transport and the agencies under its remit, such as the National Transport Authority (NTA), relates to public transport services that are open to all. There is a clear distinction made by the Department of Transport

between its responsibility for the provision of access for persons with disabilities to passenger transport services for the general public and responsibility for the provision of specialist/dedicated 'closed' transport services. While it was asserted in one submission that public transport should be available to all regardless of their location and such transport should be frequent and reliable, the following issues were raised by respondents in relation to some of the current public transport modes

- Rail:

- Ensure a fully wheelchair accessible rail service that provides for freely available ramp systems and on hand staff support to guarantee access to trains and allocated wheelchair spaces
- Many trains and train stations continue to provide significant barriers for commuters with disabilities such as
 - No staff at some stations around the country and commuters with disabilities are faced with the uncertainty that ramps or space will be available when they arrive at the station
 - Having to give 24 hours' notice of travel, (4 hours for DART) thus stopping people with disabilities making travel plans spontaneously or in emergency situations

- Small Public Service Vehicles

- Concern over cashless payment system that is not accessible for persons with disabilities needs to be addressed. concern over cashless payment system that is not accessible for persons with disabilities needs to be addressed
 - Many Small Public Service Vehicle drivers no longer take cash. However, many are using debit card terminals with no tactile keypads, so that a visually impaired person is prevented from paying the fare. Tactile keypads on such card machines should be compulsory (a condition of the Small Public Service Vehicle license)
 - Increase the fine to €2,500 for Small Public Service Vehicle drivers who refuse to take a visually impaired person with a guide dog. This would reflect the seriousness of the offence, and bring it in line with the minimum penalty under an Equal Status complaint on the matter
 - Continue to implement measures to reach the target of a fully accessible taxi fleet
 - Apply extra weighting to taxi operators with accessible vehicles in tender processes when awarding state contracts
 - Concern over the progress in moving towards a fully accessible Small Public Service Vehicle fleet
- Community based accessible door to door transport:
 - Some submissions stated that subsidised door to door transport e.g. Accessible Community Transport Services CLG and Lucan Disability

Action Group CLG should be supported as not all people with disabilities can access public transport especially those in a wheelchair travelling by bus when there is only one wheelchair space and an infrequent service

- The following additional issues were highlighted by submissions:
 - The importance of flexible community-based public transport for example, Local Link, that enables door-to-door journeys or links to other accessible transport mode
 - Concern over the level of accessibility of vehicles operating as part of Local Link in rural settings
 - The need for accessibility criteria to be set by the NTA and applied consistently across all PSO licences and a timeline for when this would happen
 - It remains the case that some people who, because of the severity or nature of their disabilities, will not be able to avail of public transport services. In these cases, specialised transport services have an important role to play
 - Discretionary transport provided by Section 38 and Section 39 disability service providers needs to be part of the scope when looking at the transport needs of persons with disabilities
 - Specialised door-to-door transport services do not form part of the public transport sector and are outside of the statutory remit of the Minister for Transport, for example, specialised non-public (closed) door-to-door disability type services do not fall under the aegis of the Minister for Transport
 - An assessment of the Disabled Person's Parking Card scheme should be conducted to consider additional medical criteria such as cognitive impairments

Examples were cited of some initiatives, including:

- Cambridge Local Authority in England where driving members of the public sign up to a subsidised service whereby they would be able to take, for instance, visually impaired passengers to their destination within the metropolitan area, at a nominal fee
 - Transport for London and specifically its 'dial-a-ride' service
 - Case study examples of Social Mobility Taxis as a well-functioning, comprehensive community-level transport solution in many EU countries and which in Ireland might be considered through re-configuration of existing community-level supports
- Sustainable Development Goals: one submission indicated that all plans regarding the UN's 'Agenda 2030', which captures the Sustainable Development Goals and their

targets and indicators, needs to have consultation and active involvement of Disabled Persons Organisations.

2.2.3 Current Supports for Disabled Passengers Using Public Transport

- Travel Assistance Scheme

The Travel Assistance Scheme was set up by Dublin Bus in 2008 to support people with disabilities whilst travelling on public transport. It is a scheme designed to support passengers to travel independently around the Greater Dublin Area on any mode of transport.

A Travel Assistant can accompany people who need help using public transport and give advice on how to plan a journey from their home on Dublin Bus, Go Ahead, DART and Luas services.

The National Transport Authority has a Pilot of the Travel Assistance Scheme in Cork to expand the service.

Submissions indicated that:

- This has proved very beneficial for people with disabilities in the areas it is available
- There should be a nationwide extension of the Travel Assistance Scheme

- Wayfinding Centre

The National Transport Authority is providing funding to the National Council for the Blind of Ireland (NCBI) to set up the Wayfinding Centre. The Wayfinding Centre will provide orientation and familiarisation programmes on public transport for people with all disabilities. This centre aims to provide a safe, controlled space for individuals to familiarise themselves with the various modes of transport that exist in Ireland.

The Wayfinding Centre is available for all disability user groups in Ireland to avail of. The Wayfinding Centre aims to deliver innovations designed for or by people with a disability, connecting community in a collaborative space with transport operators, local authority engineers and planners, academics, industry and social organisations to inform research, training, universal design and policy development.

2.3 Timeframe, Milestones, 'Quantum Leap' Proposals

Question 3: What is an appropriate timeframe in which to achieve the vision described above, and what priority milestones should be achieved in the interim period? Are there any 'quantum leap' proposals that would make substantial progress efficiently and effectively if pursued?

While it was suggested that the appropriate timeframe will be dependent on the solutions pursued, one submission suggested that all initiatives should be in place within 12 months as the issues have been known for years.

Some of the 'immediate' actions proposed are once off, stand-alone initiatives and focused on the current system. These included such issues as:

- Replacement of the Disabled Drivers and Disabled Passengers Scheme with a needs-based grant-aided vehicular adaptation scheme
- Changes to the Free Travel Scheme, to include renewal of Free Travel Scheme card for visually impaired; making the Free Travel Scheme card identifiable for visually impaired people
- The need for the criteria for the companion pass to be reviewed
- Rail access and provision of ramps
- Engagement with the Construction Industry Federation and Engineers Ireland to see if a precast mould/formwork structure could be designed that would incorporate pipework for drainage/electrics which could facilitate the construction of accessible structures "off-site" – all that would be required is to have the foundation ready and bolt the precast structure into position at bus stops
- Small Public Service Vehicles (SPSV) – accessible cashless machines for credit cards; increasing fines for refusing visually impaired people with guide dogs
- Travel Assistance Scheme should be extended nationally

Some submissions indicated that a sense of urgency needed to be injected into the process. They highlighted frustration in that for a long period people with disabilities have been highlighting a range of issues regarding the current system of both mobility supports and accessible affordable transport provision. They emphasised what is now needed is a coordinated action plan and timelines on deliverables from all the relevant Government departments. This has wider implications for representation from departments beyond those currently represented on the NDIS Transport Working Group.

Several respondents highlighted the importance of engaging with people with disabilities in a systematic way to establish exactly what actual transport needs and mobility supports are required. For some, the timeframe within which the vision can be realised is completely dependent on the resourcing of a full mapping exercise and the commitment to resourcing the gaps identified in current provision arising from this exercise. Suggestions included:

- A mapping process of the transport needs of persons with disabilities, the identification of the current transport services available to persons with disabilities, the quantum of need that is being met by existing transport resources and the current gaps in service provision that impact on person with disabilities
- Explore the idea of an integrated, dynamic 'individual transport plan' that would map an individual's transport needs over a set period assess projected costs and determine

the best process for funding same. It was suggested that such an approach could also help to maximise the efficient, equitable and effective use of State resources across all available, planned or recommended transport supports

- The Central Statistics Office in conducting census could broaden the questions on disability to include specific transport questions relating to access to transport; journey purpose – social, educational, employment, health etc.

Co-ordination and integration, working in partnership were consistent themes in submissions received. These were expressed in a variety of ways, such as:

- The need to integrate services at a community and national level and to plan so things are connected in accordance with the person's needs, this includes all forms of public, private and community transport, as well as 'closed' transport provision
- That Universal Design is an integral part of all elements of the transport system and mobility supports, including such as, design, procurement and delivery
- The importance of whole journey approaches which includes all elements of the persons' journey including barrier free local environment as well as transport infrastructure. In this regards a mechanism for co-operation and working in partnership between Local Authorities and Transport providers and people with disabilities is critical to ensure accessible journeys

Only one submission made reference to a "quantum leap" proposal and that was about changing the current Disabled Drivers and Disabled Passengers scheme to a grant-based funding structure. This proposal did however acknowledge that the implementation of such a scheme would represent just one element of a broader solution to cater for the diverse needs of those with a mobility disability, but that if it proceeded would send out a positive signal regarding government's commitment to the area.

3 Proposals for Developing a Co-ordinated Plan

While there are a number of stand-alone suggestions that members of the Transport Working Group would like to see addressed within the current system and which could be addressed as discreet actions, there is a clear picture emerging from the submissions of moving from the current fragmented landscape to the development of a co-ordinated plan and a new policy framework which joins up existing and new supports based on the needs of people with disabilities.

A clear indication from the submissions is that a successful and viable holistic approach to the mobility and transport needs of people with disabilities necessarily requires a whole-of-Government and mainstream-first approach to the provision of these supports to meet the independent living needs of people with disabilities.

Three critical factors that have emerged from the submissions that are key to the development of a co-ordinated plan. These are:

3.1 The need for a comprehensive evidence base to inform next steps.

3.2 That high-level consideration of a joined-up policy approach be commenced as soon as possible.

3.3 The adoption of key principles underpinning next steps and future policy.

3.1 Comprehensive Evidence Base

A stronger evidence base is required. This may involve

- **Mapping** - This would include, *inter alia*, conducting a full mapping of the transport needs of persons with disabilities, the identification of the current transport services available to persons with disabilities, the quantum of need that is being met by existing transport resources and the current gaps in service provision that impact on person with disabilities. It could also include journey mapping to ascertain if a person with a disability could use any form of public transport, where available, and what supports would be required for such use.
- **Consolidation of services** – reviewing all forms of current provision to determine where possible persons with disabilities transport needs can be served with one public transport service or by a coordinated integrated plan for transport provision
- **Identifying the potential for merging similar services** – merge similar or substitute services and combines them into a single entity by examining whether HSE (closed transport provision); travel club membership schemes (Vantastic etc), community transport and public transport services can be merged, especially in rural areas

- **Examining the potential for community-based solutions for different types of providers** –Community car schemes are being piloted in a number of areas where voluntary drivers use their own cars to bring customers to service locations where the demand is not high enough for a bus (NTA Link Programme) – extending this to include other forms of community initiatives (public and “closed”)
- **Accessibility auditing** - Conducting Accessibility Audits of all existing transport systems and infrastructure and the external environment, public spaces under the remit of the local authority. This would in turn inform co-ordinated plans for priority actions on improving accessibility.
- **Comparative international analysis** - Building on existing analysis carried out by Department of Finance through its Criteria Sub-Group contribution to the Working Group and by the NDA, and this should inform best practice in proposals being advanced
- **Costings** - Establish the actual level of public funding for transport and mobility supports currently being provided for people with disabilities. Establish the amount of money people with disabilities are paying currently for the transport they are using. This could be done as part of the mapping process outlined above.
- **Transport Support Scheme** - Consider the potential for a new Transport Support Scheme which could include a range of practical measures that would support an individual with a disability use existing transport provision where this is available and appropriate to the persons needs, such as travel assistance, buddying, mentoring, way finding and also look at potential financial supports such as concessionary fare type initiatives, and the proposals regarding the new needs-based, grant-aided vehicular adaptation scheme in replacement of the Disabled Drivers and Disabled Passengers Scheme. Establish a costing for any proposals being advanced.

3.2 Developing a New Policy Framework

Current transport provision and mobility support is delivered in the main by individual Departments. Such provision and support is based in part on foot of long-standing legislation that pre-dates contemporary disability policy in Ireland, and in part on foot of commitments across a number of national and disability-focused policies. Action 104 of the National Disability Implementation Strategy requires collaboration between the key Departments currently responsible for transport and mobility support schemes.

What has emerged from the submissions is that a new policy framework is required for the development of a coherent national policy on transport and mobility supports for people

with disabilities. This would entail a comprehensive and coordinated cross-Government and mainstream process which ensures that the focus of policy, planning and transport provision is on the customer's end to end journey and advances a joined up and door-to-door approach to transport and mobility supports for people with disabilities

The next steps in conceptualising and developing a new joined-up policy framework will likely need to build on this approach and involve more departments than have been required to engage under Action 104.

Although new policy was suggested as being required by a number of submissions, no submission set out a comprehensive suggestion for a new policy framework. This could potentially be achieved in a variety of ways by:

- creating a new stand-alone policy focused on transport and mobility supports
- capturing and joining up relevant commitments across different policy instruments
- treating transport and mobility supports as a substantial theme within any successor to the National Disability Implementation Strategy
- integrating transport and mobility supports for people with disabilities into any future overarching national policy on transport

The new policy framework may involve consolidating, merging, developing new supports and schemes and solutions. It would also be informed by the proposals emerging from the evidence collected on foot of the recommendation above and the key principles underpinning the next steps below.

While a new policy might be required, it is evident that an efficient and effective implementation process and plan also needs to be a priority.

3.3 Key Principles Underpinning Next Steps

A holistic and viable approach that supports the mobility and transport needs of people with disabilities is one that

- **Places people with disabilities as end users** as an integral part of the process; thus ensuring a better chance of providing appropriate services and supports. That transport providers, relevant public bodies, and Departments undertaking transport, transport infrastructure and associated projects should be required to set up a process which would facilitate sustained engagement with a diverse set of stakeholders that include persons with disabilities and older people as standard
- Delivers to the requirements as set out in the **United Nations Convention on the Rights of Persons with Disabilities**
- Is aligned with the **Sustainable Development Goals**

- Encompasses a **whole of government and 'mainstream first' approach** to the provision of transport and mobility supports to meet the independent living needs of people with disabilities
- Takes a **universal design approach to transport** that benefits everyone. This entails joined up thinking, working, involving Government Departments, related agencies, and stakeholders working together to provide a co-ordinated inclusive policies, regulation and standards that works nationally and at local levels
- **Addresses gaps** especially in community-level transport and mobility supports, through re-configuration and/or extension of existing supports and provides a co-ordinated transport system encompassing private, community and public modes of transport, that is timely, accessible, affordable and easy to use
- **Functions efficiently, effectively and sustainably** as a transport system and is provided equitably across different geographic regions; and is available as and when individuals require it
- Ensures people with a disability can actively move through an enabling environment for the purposes of full participation in society
- Offers mobility supports that are transparent, fair, comprehensible, effective, efficient and are value for money

4 Conclusion

At the final meeting of the Transport Working Group on 8th December 2022, a previous draft of this report was considered and discussed. The Working Group noted the significant process that had been achieved under Action 104 in 2022, and welcomed the final report as an output. Although the report captures diverse points of view, there was a recognition that nonetheless a common vision of enhanced transport and mobility supports is beginning to emerge and this is very helpful in signposting to options that could be pursued as next steps. The question of leadership in advancing next step remains open.

The following points were noted by the Group:

- The proposal by the Department of Finance in relation to a new vehicular adaptation scheme was welcomed, as was the preparatory work carried out by the Department of Finance and the Criteria Sub-Group that it established to ensure that the proposal was based on evidence of international best practice, and included a policy rationale and design principles and parameters. The outdated approach of the Disabled Drivers and Disabled Passengers Scheme was noted by the Group and it was noted that the scheme needed to be addressed as a matter of priority. The Working Group agreed that this proposal was a clear deliverable on which work could begin in the relatively near future. It was noted that the Minister for Finance supported the proposal. Nonetheless, there will still be a need to provide support for the purchase of vehicles in some instances, as, for example, a small number of individuals with significant disabilities are required to incur substantial VAT and VRT expenses to import vehicles which cannot be adapted sufficiently and appropriately in Ireland. The Group agreed that support for wheelchair accessible vehicles more generally will need to be addressed separately to the proposal for a new grant-based vehicular adaptation scheme and that personal mobility supports for people who are visually impaired, those with congenital conditions, and autistic people also needed to receive significantly more consideration in next steps.
- The Group noted that a more substantive discussion on the environmental considerations which were reflected modestly in the report was required. At present, there is no support provided to people with disabilities to encourage the use of electric vehicles, and this is particularly relevant at the time of finalising this report when the cost of electricity is increasing and the cost of petrol and diesel is decreasing. It was noted that environmental considerations should not supersede the transport and mobility requirements of people with disabilities, but it was equally noted that both aims could potentially be achieved with more dedicated consideration and input from relevant departments and agencies.

- A discussion took place in relation to Active Travel and it was agreed that planning in relation to Active Travel needs to ensure that people with disabilities, particularly pedestrians and those requiring seating along routes, are not disadvantaged by infrastructure developed for this purpose. Universal design principles should be taken into account fully in Active Travel and indeed should be central to all policy and implementation decisions.
- The provision of transport to disability services such as day services was discussed and it was acknowledged that there is presently inequality of access to such transport provision. Access to such transport should be standardised, but it was discussed that such provision does not necessarily fall within the responsibilities of the Department of Health, and for that reason other departments and agencies may need to be engaged in addressing this issue.
- The Group discussed a proposal that Disability Impact Assessments should be a requirement in the completion of all transport plans. It was noted that the completion of a Disability Impact Assessment is already an obligatory requirement of all substantive proposals requiring Government approval and that guidelines in this regard were published by the NDA and the Department of Justice in 2011.
- The report indicates that certain data was not provided in submissions and it was suggested that such data should be obtained to inform next steps.
- There were a number of additional proposals advanced in the meeting such as:
 - o Disability-specific vehicular adaptations should not be taxed
 - o Principles such as an intention to support vehicle adaptations and an intention to support personal transport should underpin next steps
- The Group's attention was drawn to the use of terminology in the report that referred to 'blind and visually impaired people', and it was recommended that this terminology should be revised in the final report. Advice on appropriate terminology was provided by VVI following the meeting and the final report has been revised to use only the term 'visually impaired'.

Documents referenced in the final discussion include:

- The NDA's 'Participation Matters Guidelines' on implementing the obligation to meaningfully engage with disabled people in public decision making.
- The NDA and Department of Justice's guidance on conducting a Disability Impact Assessment

- The HSE's 'Analysis of Transport Survey 2018/2019 - HSE Funded Adult Disability Day Services'

The Transport Working Group concluded its work under Action 104 of the National Disability Inclusion Strategy with this final report.

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