

Report on the Public Consultation on the Review of the Door 2 Door Scheme

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Executive Summary

The Department conducted a public consultation exercise on the Review of the Urban Door 2 Door service between 22 October 2012 and 14 January 2013.

The public consultation was based on proposals around three key issues; the eligibility criteria for membership of the service, flexible and integrated delivery of the service and travel assistance measures.

The Department received 39 formal written responses to the public consultation. Subsequently, Minister Danny Kennedy announced on 12 February 2013 that the current service will end on 31 March 2013. This decision is a result of contractual difficulties that have arisen from legal action regarding the procurement process for current service providers.

The single biggest concern, attracting 25 responses, related to the proposed changes in eligibility criteria. Comments focused on DSD's transition from Disability Living Allowance (DLA) to Personal Independence Payment (PIP). Respondents were concerned about the proposed removal of the criteria which allows application for membership via a GP referral letter. There were also comments on the possible adverse impact of the changes on people with learning disabilities.

There were 15 comments made in relation to operational issues. These included booking the service, flexibility and linkages between service providers in rural/urban areas. Of the 15 comments made, 8 of these focused specifically on flexibility and the need to advance book the service. Four respondents felt that the specification of the vehicles being used needed to be reconsidered.

There were also suggestions that enhancements to mainstream public services should include investment in audio and visual aids to increase accessibility and encourage greater usage by older and disabled people who can access the mainstream transport network.

The 20 responses to the proposals on travel assistance measures were generally positive and supportive of the Department's assistance measures. The majority of respondents were keen to see measures, such as the Buddy Travel scheme extended.

The information gathered as a result of this consultation will be used to shape the development of a new specialist transport service, to be designed in the future. Therefore the public consultation should provide the building blocks for a better targeted and more responsive service.

All of the contributions made to the public consultation and the analysis will be made available to the Department's project team which will be involved in the procurement of a new specialist transport service. This should ensure that future service provision

is targeted as effectively as possible and takes account of the current user perspective.

1 Introduction

- 1.1 In early 2012, Minister Danny Kennedy asked for a review of the Urban Door 2 Door scheme. The decision to undertake this review was prompted by a number of factors that included the impact of proposed Welfare Reform on the eligibility criteria to apply to be a member of the service and the increasing demand for the service exceeding availability.
- 1.2 There has been significant investment in improving accessibility for older and disabled people on mainstream public transport. However, this investment has not translated into increased usage of public transport for this group.
- 1.3 The report on the review concluded that while the operation of Door 2 Door had made a positive contribution to addressing social exclusion, the service had not been sufficiently targeted towards those most in need, nor sufficiently integrated with the wider transport network. In addition, the per-journey costs of the service were significantly higher than similar schemes operating in GB.

2 Recommendations for change

2.1 The review set out three recommendations to guide the future delivery of Door 2 Door. These stated that:

- The criteria should ensure the service is available to those older or disabled people who cannot use conventional public transport.
- The delivery model should be considered to seek ways to enhance the level of service and choice available to potential users while reducing costs to a level in line with comparable services elsewhere. This should include consideration of vehicle requirements.
- A targeted programme of investment and support should be considered to overcome the non-physical barriers and continuing gaps which impact on the accessibility of public transport for older and disabled people.

3 Consultation process

- 3.1 The public consultation that ran between 22 October 2012 and 14 January 2013 sought views on the outcome of the review and its recommendations. People were invited to comment on, and influence, changes to the service in order to make it more effective in the future.
- 3.2 The Department also sought opinion regarding methods to enhance the level of service and choice available to potential users while reducing costs to a level in line with comparable services elsewhere including consideration of vehicle requirements.
- 3.3 The proposals in the consultation aimed to provide a more effective targeting of resources and enhanced integration with the wider transport network. The Department recognises that it is important to ensure that those most in need benefit from investment. If the needs of older and disabled people can be met through inclusive, accessible mainstream transport this will contribute to addressing exclusion while reducing the need for specialist transport services.
- 3.4** The consultation and proposals were subject to a full public consultation and Equality Impact Assessment (EQIA) process. The EQIA can be accessed using the following link:
<http://www.drdni.gov.uk/doorequalitydoc.pdf>

3.5 As part of the consultation process, the Department also carried out public meetings across Northern Ireland which were advertised in the local press and on the Departmental website. The meetings were held in Belfast, Cookstown and Londonderry/Derry during December 2012 and were facilitated by Departmental officials.

Document Distribution

3.6 The consultation document was distributed to a range of stakeholders and individuals contained within the Department's Section 75 and the Inclusive Mobility Transport Advisory Committee (Imtac) contact lists and others identified as being relevant consultees.

Alternative Formats

3.7 The Department provided the consultation document in a number of alternative formats including Braille, Easyread, audio CD and large print.

3.8 The Department received 39 formal responses to the public consultation. A list of those who responded can be found at **Annex A**.

4 Analysis of Consultation responses

Responses to proposals on changes to Eligibility Criteria

- 4.1 This recommendation proposed changes to the eligibility criteria which, if implemented, would result in those people who accessed services through entitlement to the Higher Rate Care Component of DLA, or were previously registered with Bridge Accessible Transport or Disability Action in 2006, or joined the scheme by means of GP Referral no longer being eligible for the Door 2 Door service.
- 4.2 The proposed changes to the eligibility criteria for membership to the Door 2 Door service was the single biggest issue for respondents. Of the 39 responses received 25 were regarding this proposal.
- 4.3 Equality NI raised concerns about the eligibility criteria for Personal Independence Payment (PIP) placing a higher threshold standard for entitlement which does not take sufficient account of fluctuating medical conditions and requested that clarification be provided on the anomaly that could occur within membership of the Door-2-Door service where someone who is 66 can be eligible for membership through an Attendance Allowance (AA) award but not via the highest rate care component of DLA which is effectively the same.

- 4.4** This comment from Equality NI reflects the common theme from the replies received; that changes to the benefit system will adversely affect current users of the scheme who may be disallowed disability benefit and therefore will no longer be entitled to use the scheme.
- 4.5** There were also 14 comments that removing the GP Letter referral route would disadvantage people and most especially those with learning difficulties.

Departmental Response

- 4.6** The responsibility for administering disability benefits rests with the Department for Social Development (DSD). Since these are passport benefits for accessing the Door 2 Door service, consideration had to be given as to how to equitably handle the transition from DLA to PIP.
- 4.7** It is the Department's view that those in receipt of the enhanced mobility component of PIP will be eligible for membership of the scheme and that this meets our stated aim of targeting those people most in need of the service. In addition, those who continue to receive the higher rate mobility component of DLA will also continue to be eligible under the proposals.
- 4.8** The Department recognises that the proposal to end entitlement for those in receipt of the higher rate care component of DLA while continuing to provide access to

those in receipt of the higher rate care component of AA creates the appearance of an anomaly. Both DLA and AA are intended to provide a contribution towards the disability-related extra costs of severely disabled people. However, a claim for entitlement to DLA must be made when the individual is aged less than 65 years. For those aged over 65 and not in receipt of DLA any such claim must be for AA.

- 4.9** Unlike DLA, AA does not provide a separate mobility component. As such it is not possible to differentiate between assessed care and mobility needs. While recognising that limitation, AA remains the most appropriate benefit to identify those with a disability over the age of 65 and not previously in receipt of DLA. As such there is merit in the inclusion of the higher rate component of AA as part of the Door 2 Door eligibility criteria.
- 4.10** The Department recognises that this is not an ideal situation however the only alternative would be to introduce our own assessment process. This would not be a cost effective option and would further reduce the available resources for providing the service.
- 4.11** As proposals are developed for the longer term delivery of Door 2 Door type services, the Department will engage key stakeholders to address concerns regarding the eligibility criteria and access to services. This will aim to mitigate unintended adverse impacts while ensuring appropriate targeting of services towards those most in need.

Responses to Flexible and Integrated Delivery proposals

- 4.12** As part of the consultation process the Department proposed engagement with key stakeholders to explore a range of delivery options. In considering the options the stated aim was to identify those approaches, including pilot schemes, which deliver value for money and the best outcomes for potential users within available budgets.
- 4.13** Generally comments expressed the lack of flexibility of the Door 2 Door service. There were 25 individual comments received regarding the proposals for flexible and integrated service. Some respondents stated that there were difficulties with advance booking of the service. Others commented that they are unable to travel between urban and rural areas and there is a lack of linkage with the public transport network for onward travel.
- 4.14** Disability Action suggested that the Department liaises with other transport training providers to avoid duplication of services. They also suggested that future Door 2 Door vehicle specification be cognisant of the changing needs of disabled people. Disability Action indicated that the Department retaining management of the membership of the scheme was not helpful in targeting need however agreed with reviewing membership every 3 years.

- 4.15** There were 4 responses related to the number and types of vehicles being used for Door 2 Door. One of the comments stated that vehicles were not designed to take more than one wheelchair thus limiting the numbers of users who can travel together.
- 4.16** The poor availability of services in Bangor and Lisburn was mentioned in one reply. Another respondent also suggested the possible unauthorised use of the service.
- 4.17** IMTAC raised issues on the need for improved information to encourage use of mainstream services and the need for links with other travel training providers. They suggested that good practice be adopted from other schemes currently in operation such as Dial-a-Ride London and hopper services.

Departmental Response

- 4.18** The Department will engage with key stakeholders to review and consider the best delivery models available to ensure the best outcome for service users within available budgets.
- 4.19** Measures to meet the needs of those who cannot use conventional transport will be considered. This will include vehicle numbers and specification.
- 4.20** There will also be consideration of ways to link with other services including Translink services and on how to deliver a unified service between rural and urban communities.

Responses to proposals on Travel Assistance Measures

4.21 This recommendation proposed measures to help and support those who could use public transport to do so. Three key ways to do this were suggested:

- Extension of the Transport Buddy Service;
- Travel Safe Guide; and
- Provision of Travel Training

4.22 There were 20 responses which provided comment in respect of travel assistance measures and generally those were of a positive nature. There was commendation for the Transport Buddying Scheme and the Department was encouraged to develop the scheme and to review the Travel Safe Guide as appropriate.

4.23 Concern was expressed by 4 respondents that despite the provision of travel training, people with learning difficulties still experience problems using the service.

4.24 The Consumer Council suggested that any changes to eligibility be overlapped with the provision of training and support and that travel assistance measures be further extended and developed.

4.25 Comments were received proposing further investment in audio and visual aids to assist travel on mainstream transport.

4.26 The Consumer Council response pointed to recently undertaken research which indicated that the Door 2 Door service is the only viable way some individuals can travel and raised concerns about altering the eligibility criteria without full knowledge of the remaining barriers to using mainstream public transport which can be environmental as well as physical.

4.27 The issue of barriers to using mainstream public transport was also cited by Disability Action in its response, and it called for improved communication.

Departmental Response

4.28 The Department recognises the importance of travel assistance measures. Further work is being undertaken to identify ways to extend current schemes and to look at good practices which can be implemented in Northern Ireland.

Other Comments

4.29 There were 8 comments made on other issues aside from the proposals in the consultation. Two respondents wanted an appeal process and 2 comments were made regarding provision of a united specialist transport services between rural and urban areas. There was a suggestion that a way to address the issue of the high cost of the service is to raise the user charge. One individual was concerned that if Door 2

Door was removed there are no alternative services available.

Departmental response

4.30 The Department recognises the need to ensure the continuing need for a specialist transport service.

4.31 Annex B provides quantitative data on the breakdown of all the received comments by issue.

4.32 Annex C gives a summary of the key responses received.

5 Conclusion

- 5.1 It was evident from the majority of the responses that users rely heavily on Door 2 Door. Whilst the service as it currently operates is not perfect it is obvious from the comments articulated that there is a strong perception that the need for this type of service will remain, irrespective of improvements to mainstream public services or travel training opportunities.
- 5.2 The Department acknowledges the issues raised by respondents with respect to the changes proposed. Mitigation measures will be considered where changes may have an adverse effect, especially on people with learning difficulties.
- 5.3 Barriers to using mainstream transport remain and consideration of ways to tackle the obstacles will be considered as part of the development of any future service. Ways to extend practical and tailored travel assistance measures will also be researched and developed.

ANNEX A

LIST OF CONSULTEE RETURNS

Consultee Reference Number	Consultee	Organisation/individual
1	William Bleakes	Individual
2	G J Scott	Individual
3	Alderman William Leathem	Local government body
4	Eileen McClenaghan	Individual
5	Cynthia Boyle	Individual
6	North Down Citizens Advice Bureau	Organisation
7	Alderman Gordon Dunne	Local government body
8	Lawrence Reid	Individual
9	Omagh District Council	Local government body
10	Consumer Council NI	Organisation
11	Volunteer Now	Organisation
12	Marjorie Halligan	Individual
13	Declan McBride	Individual
14	Tom McKeown	Individual
15	Belfast Citizens Advice Bureau	Organisation
16	Disability Action	Organisation
17	Paul and Esther Montgomery	Individuals
18	Alison Lockhart	Individual
19	Morgan Solicitors (on behalf of client, Jane McManus)	Individual
20	Patricia Millar	Individual
21	Parkinsons UK	Organisation
22	Equality Council NI	Organisation
23	Steve Mallon	Individual
24	Ken Neill	Individual
25	Compass People	Organisation
26	Niamh Wellbeing	Organisation
27	Belfast Forum	Organisation
28	IMTAC	Organisation
29	Community Transport Association UK	Organisation
30	Bridge Accessible Transport	Organisation
31	Belfast City Centre Management Company	Organisation
32	Health & Social Care Board	Non Departmental Public body
33	Patient and Care Council	Organisation
34	Down District Council	Local government body
35	Northern Health Trust	Non Departmental Public body
36	Noreen Thompson	Individual
37	Mencap	Organisation
38	Bangor Spectator	Organisation
39	Linda Stoops	Individual

ANNEX B

Table showing comments by issue.

Consultee Reference No	Eligibility Criteria			Flexible and Integrated Delivery	Assistance Measures	Other
	GP Referral	DLA / PIP	Registered with Bridge			
1		✓				Exclude people who receive High Rate DLA
2						
3				✓		
4		✓				
5	✓	✓		✓	✓	
6	✓	✓			✓	
7	✓	✓	✓			
8						No alternative if service withdrawn
9			✓	✓		Rural needs to be considered
10	✓	✓		✓	✓	Improve complaints process
11				✓	✓	
12						
13		✓	✓	✓	✓	
14		✓	✓	✓	✓	
15	✓	✓			✓	Appeal process New referral method for first time users.
16	✓	✓	✓	✓	✓	Appeal process
17				✓		
18				✓		
19		✓				
20				✓		
21	✓	✓			✓	
22	✓	✓	✓	✓	✓	
23				✓		
24				✓		
25		✓		✓		
26	✓	✓		✓	✓	
27				✓		
28				✓	✓	Raise cost of trips to user
29	✓	✓	✓	✓	✓	Allow Community Transport sector to operate in rural areas
30	✓	✓	✓	✓	✓	
31	✓	✓	✓	✓	✓	
32	✓	✓	✓		✓	
33		✓		✓	✓	
34				✓	✓	
35		✓				
36				✓		
37		✓		✓	✓	
38	✓	✓				
39		✓			✓	
TOTALS	25 individual responses Of these: 14 related to GP Referral 24 related to DLA/PIP 10 related to Registered with Bridge			25	20	8

ANNEX C

SUMMARY OF KEY CONSULTATION RESPONSES

Organisation	Summary of Comment
Disability Action	<p>Disability Action are concerned about:</p> <ul style="list-style-type: none"> • the impact of restricting eligibility • that PIP may not assess mobility needs adequately . • Operating times of the scheme • Driver training • Non-connectivity with other transport. • Duplication of services. • Vehicle specification should reflect the changing needs of disabled people • Lack of an appeal process for membership of the Scheme • Lack of detail on amendments to the Safe Travel Guide • The EQIA that was carried out. <p>The organisation would:</p> <ul style="list-style-type: none"> • welcome the introduction of audio/visual systems for travel by bus.
Imtac	<p>Imtac have concerns regarding:</p> <ul style="list-style-type: none"> • the impact of restricting eligibility. • the need for improved information to encourage use of mainstream services and for better links with other travel training providers. • suitability of vehicles <p>Suggested that:</p> <ul style="list-style-type: none"> • good practice be adopted from other schemes such as Dial-a-Ride London and hopper services. • consideration be given to limiting the number of journeys per week • addressing set usage patterns and raising the cost to the user.
Consumer Council	<p>Consumer Council concerned that:</p> <ul style="list-style-type: none"> • Door 2 Door service is the only viable way for some individuals to travel • Department should identify remaining barriers for passengers with reduced mobility before changing criteria. • Application process should be reviewed. • Concern raised on the number and types of vehicles being used for Door 2 Door, and • Lack of availability of services. • Suggested that any changes to eligibility be overlapped with the provision of training and support and that travel assistance measures be further extended and developed.
Equality NI	<p>Equality NI:</p> <ul style="list-style-type: none"> • acknowledges the contribution of the buddy travel scheme and • would welcome investment in audio and visual aids to assist travel by bus. <p>Concerned about :</p> <ul style="list-style-type: none"> • impact on restricting eligibility • the lack of engagement with the existing membership and users of the Door 2 Door service. • the eligibility criteria for PIP placing a higher threshold standard for entitlement which does not take sufficient account of fluctuating medical conditions • Anomaly that could occur where someone who is 66 can be eligible for membership of the service but not via the highest rate care component of DLA which is effectively the same.

