6 June 2023

Re: Budget 2023-24 Equality Impact Assessment Public Consultation

Dear Sir / Madam

I am writing on behalf of the Commissioner for Older People for Northern Ireland (COPNI) regarding the adverse impact on older citizens of the proposed DfI Budget.

COPNI recognises both the financial constraints on the Department and the accuracy of the Equality Impact Assessment in identifying the damage to the older population that the proposals would constitute. Nevertheless, it is essential that the office of the Commissioner reinforces the message that everything should be done to avoid the harm inherent in the measures outlined in the EQIA.

Section 4.12 of the Consultation document notes that ‘the options available to the department to reduce the remaining resource spend involve scenarios that include: A reduction in public transport provision; [and] community transport services not funded’.

As the document acknowledges, the consequences of such cuts would have a disproportionate impact on already vulnerable sections of society:

Older people, who normally make up approximately 20% of Metro passengers, 16% of NIR passengers and 13% of Ulsterbus passengers, and 57% of community transport users, require a service level to meet their normal daily needs which may include access to shops, friends and community facilities as well as access to health and care services. (6.13)
Choosing ‘options’ which result in the termination or reduction of services such as Dial-a-Lift, Disability Action Transport Scheme, Shopmobility; or curtail access, coverage and frequency of Translink services would be a choice against older citizens. The Consultation document notes that dependence on public and community transport increases for older people:

*Difficulty with travel due to a physical disability or long-standing health problem increases with age: 6% of 16-29 year olds had difficulty with travel compared to 42% of those aged 70 and over. (6.23)*

Currently, there is much public discussion about ‘the tough choices that have to be made’ as regards departmental spending. The Consultation document properly identifies where the DfI’s choices would hit hardest:

*Early indications are that these proposals may have negative impacts on older and disabled people in particular. (4.13)*

Yet, lost in this language of ‘unavoidable’ austerity is that the ‘proposals’ and ‘the options’ are in fact, choices, which a government department has identified. These proposals to reduce or terminate public and community transport provision amount to a plan for less or no transport for many older people. The office of the Commissioner for Older People for Northern Ireland rejects, without caveat, these proposals which would visit disproportionate harm on older people and undermine the principle of equal citizenship.

Best wishes

*Conn Mac Gabhann*

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