



Submission to the Department of Transport on its Statement of Strategy 2023-2025

*Age Action is Ireland's leading advocacy organisation on ageing and older people.
Age Action advocates for a society that enables all older people to participate and to live
full, independent lives*

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Overview

The previous *Statement of Strategy 2021-2023* is a high-level document that sets out the Department's vision, mission, values, goals and a two-page outline of its approach. While such a short document cannot go into detail, nonetheless it would make sense to add two elements:

- List the most relevant strategies and policies which will inform the Department's work in 2023-2025, on a cross-departmental basis, to include for example the *Roadmap for Social Inclusion* and the Department's *Public Sector Duty Assessment and Action Plan* (which is named under Public Engagement in the current statement).
- Make explicit reference to stakeholders and their needs when their level of need for transport is such that barriers to transport or inability to access transport affects their human rights and equality.

Values and Goals

From the existing statement, two values are particularly important for older persons:

- We serve the public and Government with integrity, respect for others, impartiality, equity, and accountability.
- We treat our people and our customers with respect, and protect the equality and human rights of everyone affected by our work.

While all are important, three existing goals are particularly relevant to the needs of older persons:

- Connectivity
- Safety, Security and Accessibility
- Public Engagement

Older Persons' Transport Needs

Older persons are a key stakeholder for the Department of Transport.

Most older persons want to live independently in their homes and communities for as long as possible, as it is where they have built their lives. 'Ageing in place' is recognised in the Programme for Government as an objective to be supported.

Many external circumstances can limit older persons' ability to exercise choice and control over their lives. It is not just a matter of physical or mental health. For example, isolated housing, lack of transportation, lack of income, digital exclusion or abuse can all be equally if not more constraining than many forms of illness or disability.

When it comes to transport, an age friendly approach is needed for public transport, driving licences, motor insurance, licencing and regulation of e-scooters, and issues of planning and road design (e.g. separating walking and cycling paths to avoid conflict between road users).

Most households in Ireland are car dependent. This results from the relatively large proportion of housing that is rural, the distance from shops and services even in suburban areas, and a lack of public transport options outside of larger towns and cities. Older persons' activities can be radically curtailed by a loss of the ability to drive, inability to afford a car or the death of a spouse who was the household's driver. Lack of transport often leads to withdrawal from social activities, with consequences for older persons' wellbeing and health. Older women and those living rurally are particularly likely to lack transport options.

Some key findings about transport from *Reframing Ageing: The State of Ageing in Ireland 2022*:¹

- Most older persons are car dependent, and a lack of public transport prevents many from shifting to a different mode of transport.
- Nearly 50% of women aged 65+ in rural areas, and around 28% of men, say they have 'unmet' transport needs.
- Non-drivers (including those who used to drive in the past) report higher levels of depressive symptoms, loneliness, and lower quality of life compared to drivers.
- The minimum cost of running a car translates into over €75 per week, which was over 27% of the maximum rate Contributory State Pension for a person living alone.
- Between 7.4% and 13.8% of older persons identified costs as a barrier to driving more often.
- 70% of older persons without a driving licence are women. More than half of all women aged 75 or older do not have a driving licence. Access to driving licences are restricted for people aged 75 and older.
- Most age groups have a significantly higher rate of collisions than older drivers who, contrary to stereotypes, are safer drivers that are less likely to speed, to drink and drive or to take drugs. For example, despite representing 26% of all licence holders, persons aged 60 or older only account for 10% of all penalty points given.² Despite this, older drivers are often charged higher rates of motor insurance.
- Older pedestrians and cyclists are more than twice as likely to be killed than their proportion in the population.

The Statement of Strategy should include a commitment, within available resources, to ensuring that everyone can access a minimum essential level of transportation in order to be social and economically included, and as part of the fulfilment of their basic human rights and equality.

The Statement of Strategy should name older persons as a key stakeholder group and it should acknowledge and prioritise those who are most in need of support to meet their basic transport needs.

¹ https://www.ageaction.ie/sites/default/files/reframing_ageing_state_of_ageing_in_ireland_2022_published.pdf

² <https://www.cso.ie/en/releasesandpublications/ep/p-tranom/transportomnibus2019/penaltypoints/>

The Statement of Strategy should commit to a timeline to review and update the Department’s Public Sector Duty Assessment and Action Plan.

Key Concern: Digital Exclusion

As an example of digital exclusion, the National Driving Licence Service (NDLS) exhibits several characteristics of institutional ageism due to its aggressive ‘digital first’ approach that makes it difficult for people not using the internet to access the service.

- Even in-person appointments must be booked online or by post, as the NDLS telephone number does not allow the booking of appointments.³
- The service does not accept cash payments,⁴ despite many older persons preferring to manage their affairs through cash and unable to check their balance online.

For context, 17% of those aged 60-74 do not use the internet and half (51%) of those aged 75 or older do not use the internet. Among those who do use the internet, between 40-50% have a ‘below basic’ level of digital skills. The EU has recognised multiple barriers to digital inclusion: “For some people, the digital world is not yet fully accessible. For others, it is not affordable. And others were not taught the skills to participate fully.”⁵ A 2021 NESC report found that older people in Ireland “have much lower levels of digital skills than their counterparts in other EU countries.” It found three times as many older persons in Ireland having never used the internet compared to their British counterparts.⁶

Age Action has also heard from people who are not using their Free Travel to make rail journeys due to the measure requiring them to book online. We have also heard from older persons who have been repeatedly refused access to regional bus services because they were not able to book online and there were insufficient places to accommodate them.

The Statement of Strategy should commit to the inclusion of those who are digitally excluded, including ensuring that public consultations comply with best practice guidelines to make them accessible and inclusive to people not using the internet.

The Statement of Strategy needs to qualify support for efficiencies through digital technology with a recognition that for years to come a substantial proportion of people will continue to need to be served through traditional modes of communication such as telephone and person-to-person.

³ “NDLS appointments cannot be scheduled or cancelled by contacting this number.”
<https://www.ndls.ie/help/contact.html>

⁴ “NDLS can only accept debit/credit card payments, Google Pay/Apple Pay or Payzone vouchers. Unfortunately, we are unable to accept cash, cheques or postal order payments.” <https://www.ndls.ie/booking-service.html>

⁵ <https://digital-strategy.ec.europa.eu/en/policies/digital-inclusion>

⁶ *Digital Inclusion in Ireland: Connectivity, Devices and Skills* http://files.nesc.ie/nesc_reports/en/154_Digital.pdf

Key Concern: Driving Licence Age-Related Terms

The World Health Organisation (WHO) identifies arbitrary age limits in legislation as a form of ageism.⁷ In Ireland, a person from age 65 can only renew their driving licence until age 75, and persons aged 75 or older can only have 3-year licences with added requirements to demonstrate their fitness to drive. While licence renewal from age 70 is free of charge, associated eyesight and medical tests are not.

The imposition of age limits and extra requirements on persons simply due to their age is discriminatory and runs counter to the Department's Public Sector Equality and Human Rights Duty, and counter to its commitment to equality and human rights in the existing *Statement of Strategy 2021-2023*.

The Statement of Strategy should regard arbitrary age limits as an unacceptable form of discrimination.

Key Concern: The Lack of Public Transport

Irish homes are on average 2.3km away from a supermarket or convenience store, 2.5km from a post office, 2.8km from a pharmacy, 3.1km from a GP, 5.5km from a bank and 6.3km from a swimming pool.⁸ These average distances are obviously shorter in urban areas and can be considerably further in many rural districts. For example, the distance to the nearest supermarket is on average 0.5km in Dublin City and 0.8km in Cork City. In contrast, in Galway County it is 4.6km and in Roscommon it is 5.0km.

Three in five (61%) people aged 66+ live more than 500 metres away from their nearest public transport stop. For three in ten (31%), the nearest stop is more than 2km away.⁹

One-quarter of adults living in Dublin city/county rely mainly on public transport, compared to just 2% of adults in rural areas, reflecting the vast differences in transport services available. 58% of adults aged 50 and over living in rural areas rate the public transport services in their area as poor or very poor.¹⁰

The Statement of Strategy should give greater emphasis to providing public transport, especially in rural areas where public transport options could include rural bus or taxi schemes.

The Statement of Strategy should note that the provision of public transport involves a range of measures to make the service accessible to all, including older persons, such as accessible routes, accessible public transport vehicles, bus shelters with seats, and affordability.

⁷ <https://www.who.int/publications/i/item/9789240016866>

⁸ CSO (2019) *Measuring Distances to Everyday Services in Ireland* <https://data.cso.ie/table/MDS02>

⁹ CSO (2016) *Measuring Distances to Everyday Services in Ireland* <https://data.cso.ie/table/MDS06>

¹⁰ Donoghue OA, Orr J, Leahy S and Kenny RA (2017) *Transport Patterns in Community-Dwelling Adults Aged 50 Years and Over in Ireland*. The Irish Longitudinal Study on Ageing (TILDA). https://tilda.tcd.ie/publications/reports/pdf/Report_TransportPatterns.pdf

Key Concern: Phasing Out of Non-Electric Cars

As noted above, most older persons are car dependent.

While older persons report high levels of concern with climate change in surveys, they are often not in a financial position to take action to change their existing behaviours. Specifically, most older persons rely on the State Pension as their main or only weekly income, and most have a relatively low level of savings and multiple demands on those savings. Older persons often cannot access credit if they have a low weekly income from a pension. These realities make it difficult for older persons to replace their car, even with an older second-hand car. Tax breaks for electric vehicles are irrelevant to someone on a low income, and there is not yet a substantial second-hand market of electric cars.

The Statement of Strategy should emphasis affordability of private car ownership as part of the transition to electric vehicles, noting that tax breaks are not always the right mechanism to achieve this.

Key Concern: Car Insurance Costs

Research conducted by the Central Bank found that loyal customers can be charged more than those who switch frequently. Anecdotally, many older persons have told Age Action that motor insurance is a concern for them. Some industry surveys conducted by brokers have shown that some older persons could secure much lower car insurance by switching. The fact that most older persons are not using the internet or have below basic digital skills is a significant barrier to them ‘shopping around’ or securing the best deals for car insurance.

People aged 65+ are less likely to be involved in road traffic collisions than people of younger ages. For those aged 65-74 who hold driving licences, 0.9% of men and 2.9% of women are involved in road traffic collisions. For those aged 75 or older who hold driving licences, the proportion is 1.9% of men and 1% of women. In contrast, younger drivers’ rates of collision are up to 4.3% for men aged 18-24 and 4.6% for women aged 25-34. Most age groups have a significantly higher rate of collisions than older drivers.¹¹

The Statement of Strategy should emphasise affordability of private car ownership, including the need to ensure equity in terms of car insurance.

Key Concern: Accessibility

The UN Convention on the Rights of Persons with Disabilities identifies the need for states to ensure people with disabilities enjoy the greatest possible independence. This requires being able to access transportation on an equal basis to others and having personal mobility.¹² The rights include “the identification and elimination of obstacles and barriers to accessibility” (Article 9) and “facilitating the personal mobility of persons

¹¹ <https://data.cso.ie/table/NTA50>

¹² https://www.un.org/disabilities/documents/convention/convention_accessible_pdf.pdf

with disabilities in the manner and at the time of their choice, and at affordable cost” (Article 20).¹³

While the existing statement names the UN Convention in the context of public engagement, **the Statement of Strategy should strongly recognise the importance of accessible transport to allow people with disabilities – including older persons – to be socially included and to have their human rights fulfilled.**

Key Concern: Safety

Older pedestrians and cyclists are disproportionately among those killed on Irish roads. Of 811 pedestrians and cyclists killed in the period 2005-2019, 350 (43.2%) were people aged 55 or older. A third (32.9%) of all cyclist fatalities and just under half (45.4%) of all pedestrian fatalities were people aged 55 or older.¹⁴ Researchers note that accidents involving older pedestrians most often occur during daylight hours and in good weather conditions, and that older persons are more at risk of long-term or fatal injuries from collisions.

Many rural roads lack safe footpaths for pedestrians.

The Statement of Strategy should continue to emphasise safety in relation to active transport, and it should also recognise the reality of poor infrastructure for active transport outside of the main urban areas.

Key Concern: Health and Social Care Transportation

An obvious area of transport need is transport to health and social care services. This includes to GPs, pharmacies and other primary care services.

The Minister of State at the Department of Health has stated that “the HSE has no statutory obligation to provide transport services and no funding is allocated for this. Transport is not considered a core health service and as such Day Service funding does not include transport”.¹⁵

There is limited data available on ambulance journeys, so the use of ambulances to access healthcare on an emergency basis cannot be estimated. Likewise the proportion of ambulance journeys used by older persons is unknown.

The availability of transport to health and social care services greatly depends on where a person lives. Some people can avail of charitable services that may receive state funding.

The Statement of Strategy should recognise that transport is a key enabler for the fulfilment of people’s right to health and social care.

¹³ https://www.un.org/disabilities/documents/convention/convention_accessible_pdf.pdf

¹⁴ <https://data.cso.ie/table/ROA16>

¹⁵ <https://www.oireachtas.ie/en/debates/question/2021-09-09/1271/speech/1042/>