



**Imtac response to proposals for an  
All Ireland Free Travel Scheme  
for Senior Citizens**

**August 2006**

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## **1 Introduction**

- 1.1 Intac is a committee of disabled people and older people as well as others including key transport professionals. Our role is to advise Government and others in Northern Ireland on issues that affect the mobility of older people and disabled people.
- 1.2 Our aim is to ensure that older people and disabled people have the same opportunities as everyone else to travel when and where they want.
- 1.3 Intac receives support from the Department for Regional Development.

## **2 Consultation**

- 2.1 Intac welcomes the clear statement of the availability of the consultation document on alternative formats and the inclusion of a textphone number.
- 2.2 Intac is however, disappointed that the consultation period is only 8 weeks, the statutory minimum. The short consultation period and with the fact that consultation is taking place over the holiday period may result in a poor level of responses. In future if changes are being proposed to important policies it is vital that the Department allow enough time for interested parties to respond. Consultation periods should be at least 12 weeks.
- 2.3 Intac supports Mencap's "Make it Clear" campaign which promotes the provision of information accessible to people with a learning disability. Intac are encouraging Government and service providers to provide information in "easy read" formats. Intac recommends that the Department consider how best future consultation and information can be made accessible to people with learning disabilities including the production of easy read formats where appropriate. As people with learning disabilities are one of the groups currently eligible for concessionary travel, the Department need to ensure future consultation about the Scheme is inclusive.
- 2.4 The Accessible Transport Strategy makes it clear that it is Departmental policy to consult with older people and disabled people at an early stage of policy development. Intac is

disappointed that no discussions have taken place with relevant stakeholders during the development of these proposals. In addition the Department should have been more proactive in obtaining the views of older people and disabled people during the current consultation period.

### **3 Comments on the proposals**

- 3.1 Imtac is disappointed that changes are being made to the current Concessionary Fares Scheme prior to the proposed review of the Scheme. In our response we will set out how the inequality within the current scheme seriously restricts the effectiveness of the current scheme in promoting social inclusion. Imtac is concerned that the current proposal will compound existing inequalities, limit the impact of the proposed review of the scheme and not fulfil the stated aim of the policy to reduce social exclusion.
- 3.2 Concessionary travel policies have developed in a piecemeal manner over the past 20 years in Northern Ireland. Successive changes to the scheme have been made with little overall understanding of how the scheme can be used effectively to promote Government policy of reducing social exclusion through making transport more accessible. There has also been a lack of integration with other Departmental programmes and policies designed to promote social inclusion through transport. This has meant that the current operation of the scheme has created inequalities for many older people and disabled people whom the Department acknowledge as “members of the community who are most vulnerable or liable to social exclusion”. The proposed review represents an opportunity to address these inequalities and maximise the impact of concessionary travel in conjunction with other programmes to tackle issues of social exclusion.
- 3.3 The inequality created by the current scheme manifests itself in a number of ways. We have listed some of the key issues below:
- Many older people and disabled people find the current public transport system physically inaccessible and therefore cannot use the current concessionary pass. For those people alternative choices are limited. It may range from having no mobility to using other forms of transport such as taxis. Using alternatives are often expensive and the cost restricts the number of journeys people can undertake.

- The Department is currently introducing door to door transport in urban areas across Northern Ireland for disabled people and older people who find using public transport difficult. Whilst this is a welcome development, the proposals are that a return trip on door to door transport will cost £3.00, a cost higher than the comparable full bus fare. In addition as door to door is a limited resource and operates on a first come first serve basis it doesn't offer the same reliability of service as a scheduled public transport.
- Disabled people and older people in rural areas face even greater difficulties. Not only are Translink buses used in rural areas more likely to be less accessible, many people have no public transport provision at all. Again the choices for disabled people and older people in rural areas are extremely limited. Many people have no access to transport; others use taxis which are expensive or not always available. The Department has established the Rural Transport Fund to address social exclusion in rural areas. However, once again the users of these services do have to pay for services. In addition to this many of the services offered through the RTF benefit groups not individuals. It is individuals in rural areas who experience the greatest exclusion.
- The current differing levels and categories of concessions create further inequalities. Northern Ireland is now the only region of these islands that doesn't offer disabled people free travel. Fewer groups of disabled people are eligible for the concessionary travel than in Great Britain. This means that disabled people in Northern Ireland have the least generous concessionary travel scheme compared to other parts of these islands. The unfairness of the current system is compounded by the fact that some groups of disabled people do get free travel.
- The qualifying age for the older passengers Smartpass is another issue. In Great Britain this is 60 for both men and women but is 65 here. Imtac supports the campaigns by organisations representing older people for the age qualification to be lowered to 60 for both men and women.

#### 3.4 Whilst Imtac recognises that the Concessionary Fares Scheme

has brought benefits to many people, it remains largely a blunt instrument in reducing social exclusion. Imtac has been at the forefront of calls over the past few years for a review of current scheme to enable the scheme to benefit more people and compliment other programmes designed to reduce social exclusion. There are numerous examples from across Great Britain of how local government uses broader concessionary travel policies to reduce some of the inequalities listed above. These include:-

- The operation of a number of taxi-card schemes in urban and rural areas of Scotland. Taxi-card allows disabled people and older people living in these areas a set number discounted taxi journeys over a year. Whilst not free journeys the scheme substantially reduces the cost of travel and enables people to travel more often.
- The operation of a number of voucher schemes by local authorities in England. Voucher schemes can be offered as an alternative to the standard travel pass or compliment it. Vouchers can be used on other forms of transport other than scheduled bus services such as taxis and community transport.
- A number of local authorities offer the same concessions as public transport for users of complimentary services such as door to door and Dial-a-Ride. Many local authorities, such as Merseyside, offer free travel for users of these services.
- The Welsh Assembly has set aside a substantial proportion of its concessionary travel budget for schemes in rural areas that do not involve scheduled public transport. The programme has funded local schemes involving community transport and taxi operators.

3.5 Whilst Imtac acknowledges that Government funding is limited. We believe that a more flexible approach to concessionary travel and integration with existing programmes will open more travel opportunities to disabled people and older people. Imtac is concerned that proposed cost of the current proposal will restrict future ability to introduce such measures.

3.6 All Ireland travel will undoubtedly benefit some older people. It may assist people living in border areas to travel locally. However,

many disabled people and older people in Northern Ireland will not benefit from the proposal. If Government is to tackle the social exclusion experienced by many disabled people and older people the focus must be on providing an acceptable level of mobility for such people to enable access to everyday local services (currently inaccessible) such as health services, training and employment opportunities, and shopping and leisure facilities. The Department must give greater thought to how concessionary travel in conjunction with other “inclusion” programmes can deliver greater travel opportunities to older people and disabled people.

- 3.7 Imtac is disappointed that disabled people are excluded from the current proposals. The piecemeal approach to developing concessionary fares has led to a variation in the level of concessions available to groups eligible that has no relation to the stated aims of the policy to reduce social exclusion amongst vulnerable groups. The Department must address this perceived hierarchical approach to providing concession travel through the planned review of the present scheme. Given that both older people and disabled people experience similar problems accessing transport (recognised by the Department in the Accessible Transport Strategy) differential concessions for each group are extremely unfair and difficult to justify.
- 3.8 In summary Imtac is disappointed that Government has decided to make another piecemeal change to the current Concessionary Fares Scheme given the existing inequalities within the scheme. A better solution would have been to consider the current proposal amongst others in a Review of Concessionary Fares Scheme. This would allowed the Department to assess which proposals could deliver the maximum benefit to disabled people and older people and meet the Departments stated aim of using concessionary fares to reduce social exclusion. In addition Imtac has concerns that the cost of current proposal will restrict the effectiveness of the future review of the Scheme.

## 4 **Comments on the draft EQIA**

### The aim of the policy

- 4.1 The Department has clearly indicated that the aim of the policy is to “promote social inclusion by improving public transport accessibility through free and concessionary fares”. Imtac supports this policy aim but feels that the Department needs to do more to set concessionary fares in a wider policy context.
- 4.2 The Accessible Transport Strategy clearly illustrates the many barriers the current transport system presents for older people and disabled people. Reducing the cost of travel is only one component of making the transport system accessible. The Department should make clear that whilst the aim of the policy is to make transport more accessible, concessionary fares is only one part of a package of measures aimed at addressing all barriers to travel. Concessionary travel can only impact on social inclusion as part of a broader programme of policies and services.

### Consideration of available data

- 4.3 The Department has listed a number sources of data used in the assessment of impacts. Imtac is concerned that the Department is relying too heavily on selected statistical data and has not given due consideration to the qualitative data available.
- 4.4 One such source of qualitative data is the consultation report published by the Department during the development of the Accessible Transport Strategy. The report clearly highlights the restrictions of the current concessionary fares scheme as well as the inequalities the scheme presents for many older people and disabled people.
- 4.5 The report highlights use of “preliminary consultation” with Section 75 groups. Imtac is concerned that the Department did not consult with the Committee about the new policy at an early stage, particularly as the ATS makes clear that Imtac is the main source of independent advice to the Department on all matters that affect the mobility of disabled people and older people. Imtac would like further information on the extent of pre-consultation involved. We believe that even a limited amount of pre-consultation would have identified some of the issues we have raised in this response.

- 4.6 The Department has used data on the uptake of the free travel Smartpass. Whilst these figures are impressive it should be understood that a Smartpass has other benefits for older people other than for travel. Most notably it is a form of identification for voting. Imtac believes that the Department should have looked more closely at usage of the current scheme. We understand that statistics are available which identifies who uses the pass on a regular basis and who does not. These figures would give a true representation of the impact of the scheme on the mobility of older people. Imtac recommends these figures be included in the final EQIA

#### Assessment of Impact

- 4.7 The Department has clearly indicated a positive impact for the policy for older people. Whilst this true the Department's use of data has overstated the positive benefits to this grouping. Imtac believes that the inclusion of qualitative data from the development of the ATS, pre-consultation with groups representing older people and consideration of data on usage of the current scheme would provide a more balanced consideration of the impact of the current scheme and the proposed policy.
- 4.8 The Department has indicated that the policy proposal will impact positively on disabled people. Imtac would dispute this and question the data used to make this assumption. Whilst the Department has no data on usage of the scheme by older people with disabilities, there is data available on the uptake of the half fare Smartpass by disabled people. This data shows that only around 10% of those eligible have taken up the pass. Qualitative data (such as the ATS) indicates that other barriers presented by the transport system restrict the uptake by disabled people of concessionary fares. It is not unreasonable to assume that older people with disabilities will experience similar difficulties.
- 4.9 The Department also acknowledges that disabled people under 65 will not be included in the current proposal. The current scheme only allows many disabled people a 50% concession and does not include all the groups of disabled people eligible for the concessionary travel in Great Britain. Given the evidence available it is hard to sustain the assumption that the proposal will be positive for disabled people. Whilst Imtac does acknowledge



that some disabled people will benefit from the proposal we believe that many more will not and that changes are required to the overall scheme to make concessionary travel more accessible to disabled people.

### Mitigation/Alternatives

- 4.10 Given that Imtac has argued that there are many inequalities created by the current Concessionary Fares Scheme and that the current proposal will do little to address these problems we are disappointed that the Department gauge impacts as positive and mitigation unnecessary. If the Department wish to achieve the stated aim of the policy, ie promote social inclusion, the Department must acknowledge the limitations of the current scheme. Imtac has provided a number of examples of how the Department could provide alternatives to improve the accessibility of current arrangements for older people and disabled people.

## **5 Conclusion**

- 5.1 Imtac welcomes the opportunity to respond to current consultation. We are disappointed that the current proposal has been published prior to the planned review of the Concessionary Fares Scheme. In our response we have highlighted many of the inequalities the current scheme presents for many older people and disabled people. Imtac feels that the Department should have considered the current proposal as a part of an overall review of the Scheme. In addition Imtac believes the cost of the current proposal will restrict the effectiveness of the future review of the Scheme.

## **Imtac Members**

Frank Caddy	Chair
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More information on our members is available on our website, visit [www.imtac.org.uk](http://www.imtac.org.uk).

## **Observers**

Kevin Doherty	Disability Action
Ian Humes	Mobility and Inclusion Unit (DRD)
Emma Kelly	Equality Commission for Northern Ireland
Eddie Lynch	General Consumer Council

## **Secretariat**

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