



**Comments from Imtac about the Consultation on
free and discounted fares on public transport
(concessionary fares)**

(August 2023)

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About Imtac

The Inclusive Mobility and Transport Advisory Committee (Imtac) is a committee of disabled people and older people as well as others including carers and key transport professionals. Its role is to advise Government and others in Northern Ireland on issues that affect the mobility of Deaf people, disabled people and older people.

The aim of Imtac is to ensure that Deaf people, disabled people and older people have the same opportunities as everyone else to travel when and where they want.

Imtac receives support from the Department for Infrastructure (herein after referred to as the Department).

Introduction

Imtac welcomes the opportunity to respond to the current consultation about the Concessionary Fares Scheme in Northern Ireland. The consultation comes at a time of significant budgetary pressures across Government in Northern Ireland. For the Committee it is essential that our comments are not considered in the context of delivering savings, our position remains that reducing the funding of schemes and services used by Deaf people, disabled people and older people will inevitably be detrimental to them by increasing existing barriers to travel.

The consultation does, however, represent an overdue opportunity to review the effectiveness the scheme, the first since 2007. It is the intention of the Committee to use its response to set out a clear position in terms of the future role of the scheme in addressing the barriers to travel experienced by Deaf people, disabled people, and older people, prioritising the actions we believe are important to making the scheme more effective. Central to our priorities is how the scheme can better achieve its overall aim, namely reducing social exclusion.

We would like to put on record our praise to officials undertaking the consultation for their positive approach to engaging with Deaf people, disabled people and older people about the options. This positive approach includes attending numerous meetings with users of the scheme. The Committee commends the production of materials in other formats including Easy Read and signed video in both British and Irish

Sign Language. This positive approach provides a template for others for future engagement and consultation.

The Development of Concessionary Fares

Prior to 1998 only people who were registered blind were entitled to free travel on public transport while people aged 65 and over and War Disabled Pensioners were entitled to half fare travel. People who were registered blind were also entitled to free point to point travel between Northern Ireland and the Republic of Ireland.

Since the Northern Ireland Assembly was established in 1998 there have been a number of piecemeal changes to the scheme here. In 2002 free travel was extended to people aged 65 and over and to War Disabled Pensioners. In 2004 the scheme was extended to include half fare concessions for eligible groups of disabled people. In 2007 free travel for people aged 65 and over was extended across the island of Ireland. In 2008 free travel on public transport in Northern Ireland was extended to people aged 60 to 64. The final extension of concessions took place in the 2010s with funding from DAERA through the Assisted Rural Travel Scheme (ARTS) enabling existing concessions to be used on rural Dial-a-Lift services.

During the same period changes took place in the rest of the UK to standardise concessionary travel schemes. Prior to 2000 concessions were restricted to local authority areas only, with a myriad of different eligibility requirements and restrictions on usage. The then Labour Government introduced measures to standardise eligibility criteria and in 2008 launched a national off peak bus concessionary scheme for England. Both the Scottish and Welsh Governments have established their own national concessionary travel schemes. Although concessions still vary from area to area the English, Welsh, and Scottish schemes offer the same free concession to both eligible older people and disabled people. Northern Ireland remains an outlier in the UK (and Ireland) in discriminating between older people and disabled people in the operation of its concessionary travel scheme, offering only a limited concession to the majority of eligible disabled people living here.

Assessment of the current concessionary fares scheme in Northern Ireland

In our responses¹ to previous extensions of the Concessionary Fares Scheme Imtac has described the scheme as a “blunt instrument’ in tackling social exclusion. The scheme targets affordability as a barrier to travel but affordability is only one of the 4 As commonly cited as barriers to travel that contribute to the social exclusion of amongst others disabled people and older people. The other 3 As are accessibility, availability and acceptability (sometimes also referred to as attractability).

A scheme focused purely on affordability most benefits people who already have good access to public transport and least benefits people who have restricted access to transport. It can be argued that Deaf people, disabled people and older people who experience the greatest exclusion do not benefit in any way from the current scheme. This disparity is exacerbated by the significant costs of the scheme when compared to the limited resources made available to schemes which provide alternative transport options for Deaf people, disabled people and older people such as rural Dial-a-Lift and the urban DATS services².

The extension of the scheme to rural community transport through the Assisted Rural Travel Scheme (ARTS) was a welcome attempt to extend the benefits of concessionary travel to users of these alternative services. However, people who use the urban DATS service still must pay for travel, despite facing the same barriers as rural transport users. By way of example, it is absurd that an older person who lives a mile or so outside Omagh can travel at concessionary rates while someone using a service provided by the same operator but living in Omagh itself must pay £5 for a return trip on DATS.

The piecemeal development of the scheme here has resulted in a series of differing concessions for different groups. Not only is it hard to justify this disparity based on the aim of the scheme, but it also creates complexity in the administration of the scheme which must mean additional and unnecessary cost for individuals and for Government. For

¹ See <https://www.imtac.org.uk/imtac-response-proposals-all-ireland-free-travel-scheme-senior-citizens> and <https://www.imtac.org.uk/imtacs-comments-public-consultation-and-draft-equality-impact-assessment-proposal-extend-northern>

² Projected 2023/24 budgets for Transport Programme for People with Disabilities £2,531,629, Rural Transport Fund (Including Assisted Rural Travel Scheme) £2,869,006 and Concessionary Fares Scheme £44,600,000.

example, a person who is registered blind has limited access to cross border travel and therefore should not swap their current pass for the 60-64 pass. However, once they reach 65 the wider cross border concessions mean switching to the 65 plus pass makes sense. Someone who is partially sighted needs to change their half-fare pass at 60 and then again at 65, despite facing many of the same barriers as someone who is registered blind.

It is the treatment of disabled people under the scheme that is particularly hard to justify. Following the extension of scheme to people aged 65 and over in 2002, our predecessor Transport Advisory Committee (TAC) met with the then Regional Development Minister, securing a commitment to consult on extending free travel to wider groups of disabled people in line with developments in the rest of the United Kingdom. It is ironic that the decision to only offer half fare concessions with more restrictive eligibility criteria than elsewhere was made by a Direct Rule Minister from Westminster without consultation and contrary to the advice of the TAC³. (It would appear to members of Imtac that the concept of parity has a flexible application.)

Following recommendations from the TAC, the Accessible Transport Strategy, published in 2005, committed to a review of the Concessionary Fares Scheme within 2 years. That review⁴ brought forward a series of options, including extending free travel to wider groups of disabled people. In 2008, the Executive decided instead to extend the scheme to people aged 60-64, explaining “this is the single most important concessionary fares issue raised by members of the public and their elected representatives⁵”, again choosing to ignore the voices of disabled people.

Since 2008, Imtac has continued to raise the disparity within the scheme with subsequent Ministers and officials. It was only in 2022 that then Infrastructure Minister accepted the case for change and signalled her intention to extend to the scheme to include free travel to more groups of disabled people. With no Minister in place and a challenging budgetary situation, there now seems little prospect at this time of providing parity for disabled people compared with every other part of these islands.

³ A copy of the TAC consultation response is contained in Appendix A

⁴ <https://www.assemblyresearchmatters.org/wp-content/uploads/2017/12/Policy-review-of-concessionary-fares.pdf>

⁵ Taken from an NI Assembly research paper -

http://www.niassembly.gov.uk/globalassets/documents/raise/publications/2012/regional_dev/18612.pdf

The administration of the current scheme also creates barriers for older people and disabled people. The requirement for older people to attend bus and train stations in person, for instance, potentially discriminates against older disabled people who find it very difficult or impossible to travel. More absurd are the overly restrictive eligibility requirements of the half-fare concession for disabled people. By way of example, people with conditions such as epilepsy who have been told they cannot drive must first apply for a driving licence and provide evidence of refusal when applying for a half fare concession.

The half fare concession is itself a concession applying only to single fares and many users find any savings on a return trip minimal compared to the already discounted cost of return ticket; often promotional fares are even cheaper than using the concession. It is little wonder that uptake and usage of the half fare concession has been so low, particularly when compared to the uptake of older people's concessions.

On a more positive note, the BRT / Glider project provides an example of how broadening travel concessions can deliver on social inclusion when combined with investment in accessible and inclusive services. As part of the design of the service it was decided that half fare concession holders would travel free on Glider. Since the launch in 2018, free travel combined with an accessible, easy to use service has seen a significant increase in all concessionary pass usage compared to the services which previously operated along the routes. By contrast, bus procurement decisions over the past decade, particularly the continued investment in high floor coaches, have continued to limit the accessibility of inter urban bus travel in Northern Ireland, meaning travel continues to be difficult or impossible in areas where these vehicles are the only option for many older people and disabled people.

It is perhaps inevitable that the current consultation places further extensions or amendments to the scheme on the long finger. It reflects a scheme and a policy that is poorly targeted and where disabled people have been consistently short changed. Officials within the Department are not to blame for the current situation: rather, this has arisen from the decision-making of local politicians more concerned with gaining popularity than targeting resources effectively. More widely, it reflects an approach by successive Executives for whom disabled people have been largely invisible.

Imtac position on concessionary fares

The public debate around concessionary fares tends towards hyperbole⁶ and does not recognise the complexity and nuances around the link between access to travel and social exclusion. The concessionary fares policy remains a blunt tool in targeting social exclusion, in that it only targets affordability as a barrier to travel. Without targeting other barriers, including the availability of transport, the accessibility of transport and the acceptability of transport options, the impact of the scheme on those who experience social exclusion will continue to be limited.

This is not to say that the current scheme does not deliver significant benefits to large numbers of Deaf people, disabled people and older people. These benefits have been clearly outlined in the current consultation. However, given the sizeable budget allocated to the scheme and the increasing pressures on wider budgets it is essential that we periodically reconsider whether the targeting of the scheme can be improved.

As we have outlined previously in this paper, Imtac believes that the piecemeal development of the scheme in Northern Ireland has resulted in a scheme here that is poorly targeted and riddled with disparities and inequalities, which undermine the stated aim of the policy. The Committee recognises that there is no perfect way to target the policy at people on low incomes for whom affordability is a barrier to travel. We also recognise the wider social and environmental benefits the scheme delivers for people for who do not routinely experience social exclusion.

Because of these factors we believe that the scheme and wider policy should evolve, not only protecting people for whom currently the scheme is an essential tool in accessing transport but also broadening the reach of the scheme to more people on low incomes for whom cost is one of the key barriers to travel. To achieve the type of change envisaged by the Committee we have developed eight key priorities that we recommend the Department adopt in any future approach to concessionary fares policy. These priorities reflect the principles outlined in the New Approach paper⁷ published by Imtac in 2022 as well as the Department's own document, Planning for the Future of Transport – Time for Change⁸.

⁶ By way of example see - <https://www.belfastlive.co.uk/news/northern-ireland/mla-says-ending-free-travel-27185422>

⁷ See <https://www.imtac.org.uk/new-approach-travel-our-streets-and-our-places>

⁸ See <https://www.infrastructure-ni.gov.uk/publications/planning-future-transport-time-change>

Priority one – Prioritise investment in providing inclusive and accessible travel opportunities

The greatest barrier to using the current concessionary fares scheme for many Deaf people, disabled people and older people is the lack of suitable and accessible transport options. If the scheme is to better target those in society who experience the greatest exclusion, the overriding priority must be to increase the current travel opportunities through investment in better services and infrastructure. In particular resources should be focused on:

- As envisaged by Time for Change, investing in making everyday walking, wheeling and cycling journeys easy and accessible for everyone, connecting people to local services and facilities and prioritising linkages with the public transport network. This includes increased investment in new walking and wheeling infrastructure, increased investment in new cycling infrastructure (meeting the requirements of LTN 1/20⁹) and increased investment and priority given to the maintenance of existing infrastructure.
- Investing in a wider range of flexible transport solutions for rural and urban communities (including dynamic demand responsive transport (DRT) mentioned in Time for Change) which connect people to local services and facilities and to wider travel on the public transport network.
- Investing in an enhanced public transport network envisaged by Time for Change that is designed to be accessible and inclusive for everyone.
- Creating a regulatory system that encourages the provision of widely available and accessible taxi services in both rural and urban areas.

Priority two – Remove the disparity between older people and disabled people within the current concessionary fares scheme

The disparity in treatment between older people and disabled people within the current scheme is unjustifiable and completely inconsistent

⁹ <https://www.gov.uk/government/publications/cycle-infrastructure-design-ltn-120>

with the aims of the scheme. To achieve parity with every other comparable scheme on these islands, the scheme in Northern Ireland must in future provide free concessions on public transport services to both eligible groups of disabled people and older people. The state retirement age should be the minimum eligibility requirement for older people in Northern Ireland, with the option to maintain current concessions for those currently in receipt. To avoid future piecemeal development of the scheme Imtac recommends that legislation should be passed by the Assembly equalising concessions for older people and disabled people and ensuring both groups benefit from future changes to the scheme.

Priority three – Strengthen the eligibility criteria for disabled people

In addition to the usefulness of the current half fare concession for disabled people, the restrictive eligibility criteria are an unnecessary barrier for some people who should be able to benefit from the scheme. Imtac supports the proposal to review and revise the eligibility criteria for disabled people, using criteria from Great Britain as the baseline for proposed changes, with the future priority for eligibility focused on ensuring the scheme is targeted at people who will most benefit from the concessionary travel.

Priority four – Reduce the bureaucracy of the current scheme

Imtac believes that equalising the concessions for older people and disabled people will reduce administration costs for the scheme, removing the added costs associated with the required current transitioning between the various passes. Further changes should be considered to make it easier for people to apply to use the scheme including the proposals around residency outlined in the consultation but also looking at making applying and renewals¹⁰ more straightforward going forward.

Imtac has no fixed position on a charge for the administration of the scheme. Such a charge exists for the Blue Badge Scheme, accepted by many disabled people on the condition that fees are invested in improving the scheme. Feedback during this consultation supports a similar approach for charging for administration of concessionary travel. However, great care is required to ensure that charges do not exceed a

¹⁰ Imtac has previously made recommendations for making applications and renewals easier - <https://www.imtac.org.uk/recommendations-improvements-application-and-renewal-processes-concessionary-fares-scheme>

level that would deter those on the lowest incomes from applying, recognising the likely minimal savings achieved to the overall cost of the scheme.

Priority five – Retain the existing public transport concessions including concessions on rail travel and during peak hours on both bus and rail services

Superficially, the types of concessions available in Northern Ireland are more generous than other areas of these islands. In particular, the ability to travel on trains and before 9.30am on bus and trains are cited as examples of where older people and disabled people are better off than their English, Scottish and Welsh counterparts. The reality is that whilst the national schemes set out a minimum concession of bus travel only after 9.30am, many local authorities offer much more generous concessions, including peak travel and travel on local rail, tram and dial-a-ride services. Examples of comparably more generous schemes include Wales, Greater London, Greater Manchester, Merseyside, West Midlands, Strathclyde and West Yorkshire. Given the populations of these areas, it is difficult to sustain an argument that people in Northern Ireland are better off than their GB counterparts.

A second, more powerful argument, to maintain rail concessions is the superior overall accessibility of our rail network compared to the bus network in Northern Ireland. For the most part, our rail network is accessible with high quality main stations, rolling stock, and staff available to provide assistance if required. There is space on board trains for people travelling with assistance dogs and bulky mobility equipment along with space for at least two wheelchair users. Trains also have access to toilets, essential for some people when travelling. Bus travel is much more restrictive, partly due to a procurement policy which has prioritised the operation of high floor coaches over passenger access requirements, something that Imtac has consistently advised against¹¹. Although there is progress being made to improve bus design, removing concessions for rail travel will make travelling by public transport more difficult, contrary to the aims of the scheme.

It is true that some of the local schemes in GB listed above do restrict usage for older people until after 9.30am. For Imtac, the rural nature of Northern Ireland, and the growing requirement for people to travel longer

¹¹ The latest advice was published in 2020 - <https://www.imtac.org.uk/imtac-comments-proposals-2020-translink-goldline-vehicle-procurement>

distances for increasingly centralised services such as health appointments means that peak restrictions on travel will prove counterproductive. Peak restrictions may result in a small amount of savings to the scheme but will likely have a greater negative impact on the aim of combating social exclusion.

Imtac has specific concerns about the impact of removing peak travel concessions on disabled people of working age. Northern Ireland already has the largest employment gap between disabled people and non-disabled people anywhere in the United Kingdom.¹² We are concerned that placing restrictions on concessionary travel could potentially further exacerbate existing inequalities and again prove counterproductive in reducing social exclusion. Many of the GB local authorities highlighted previously do not include working age disabled people in restrictions on the use of concessions during peak travel times.

Priority six – Develop broader policies and measures aimed at tackling the cost of travel

Many of the people who experience the greatest exclusion cannot access the current Concessionary Fares Scheme because of wider barriers. Perversely, some older people and disabled people on lowest incomes who cannot use the current scheme because of wider barriers to travel are forced to pay substantially more for travel than those currently using the scheme. Addressing this disparity must be a priority for a future Government in Northern Ireland. In addition to improving travel options, it must also be a priority to reduce the cost of travel for people who use other modes of travel in future. Interventions could include:

- In line with Time for Change develop schemes that assist disabled people and older people with the cost of mobility equipment and accessible cycles to enable more people to make everyday walking, wheeling, and cycling journeys.
- Mirroring concessions available on public transport on all rural and urban flexible / alternative services including dynamic DRT supported by Government.

¹² <https://www.gov.uk/government/statistics/the-employment-of-disabled-people-2022/employment-of-disabled-people-2022>

- Developing voucher schemes which help with the cost of services such as taxis.
- Developing accessible and inclusive communications aimed at ensuring that people are better informed about the cost and availability of different travel options.

Priority seven – Changes to the scheme must be based solely on evidence of meeting the aims of the policy

Imtac accepts there is no easy way to target a scheme such as the Concessionary Fares Scheme to ensure that only people who experience social exclusion benefit. Eligibility must be based on a broad assessment of those in society most likely benefit from support with the cost of travel. There is strong evidence that both disabled people and older people aged 66 and above are more likely to live on lower-than-average incomes and therefore should be part of any scheme targeted at reducing social exclusion through reducing the cost of travel. Further extensions to the scheme should be justified using the same evidential bar.

The free concession for people aged 60-64 is the most contentious issue facing all schemes moving forward. Both Ireland and England have already moved to equalising age concessions with the state retirement age. Similar proposals in Scotland were rejected following public consultation and Wales maintains its concession at 60 and above. From a purely evidential perspective, it is much more difficult to justify providing support for this age bracket than other comparable age brackets. For example, broadly this group have higher levels of disposable income than some other age groups (younger people under 30 for example) and are statistically much more likely to own their own home outright. However, current policy in Scotland and Wales and widespread public and political support here is likely to make any change to the current concession very challenging.

Imtac has been a long-term advocate for the proposal in the current consultation to look at extending the current scheme to include concessions for companion travel. This positive change recognises that for some disabled people travel is often only possible when accompanied. Having to pay for the additional cost of what is an essential companion is not only unfair, it is potential barrier that prevents people making journeys. Although more work is needed to identify who

would benefit most from companion travel, evidentially the concept meets the aims of the policy.

Other extensions are also potentially justifiable within the aims of the policy. This includes the proposal in the consultation to extend free travel for asylum seekers and people who are victims of human trafficking (evidence shows this will include some disabled people). Elsewhere we have also seen how, for example, Scotland has looked to better target its scheme on those on the lowest incomes through the recent extension of free travel to people aged under 22.

Priority eight – Commit to undertake a periodic review of the scheme

Experience has shown that challenging and changing concessionary fares policy is extremely difficult. It is the easy option to view the scheme as broadly a benefit to society while conveniently ignoring the disparities and inequalities created by the scheme. It is illustrative of these difficulties that the first review of the scheme in 16 years is being undertaken by officials in the absence of an Assembly and Executive.

Given the substantial annual budget for the scheme Imtac believes a periodic review is essential to ensure the scheme remains targeted at those most at risk from social exclusion. As with the current review, future periodic reviews should consider issues such as concessions and eligibility criteria, as well as improving the application and renewal processes and more broadly the operation of the scheme including more detailed assessment of uptake and use across society.

Legislation to confirm parity of concessions for older people and disabled people should also require periodic review of the scheme, perhaps set at every five years.

Conclusion

Given the limited opportunities to influence concessionary fares policy over the past 15 years, Imtac is using the current consultation as a once in a generation opportunity to call for significant changes in the approach and targeting of the policy moving forward. We acknowledge that some of the issues covered in our response fall outside the specific questions

asked in the consultation, but as advisors to Government, it is the responsibility of the Committee to give strategic advice to Ministers, the Department and others. The Committee looks forward to further engagement with officials and, hopefully, a future Minister, about how we can develop a more effective concessionary fares scheme in the future, one which supports and complements the provision of a wider accessible and inclusive transport system.

Appendix A - TAC response to the draft EQIA on the Northern Ireland Concessionary Fares Scheme (September 2003)

1 Introduction

- 1.1 The Transport Advisory Committee is funded by the Department for Regional Development to advise on issues relating to disabled people and the transport system. The Committee is made up of disabled people, organisations representing disabled people, transport providers, transport policy makers and people with an expertise in transport or disability issues. The TAC works towards a transport system accessible to everyone.
- 1.2 The TAC is hosted by Disability Action.

2 The Consultation Process

- 2.1 In October 2002 the then Minister for Regional Development Peter Robinson announced his intention to consult on the possibility of extending the Scheme. The Departmental press release stated “the Minister said it was important to take the views from people across Northern Ireland as to how the scheme could be extended.” By using the EQIA for consultation the Department are not meeting this commitment. Consultees are being asked to make limited comments on decisions already made by the Department to extend the scheme to certain groups.
- 2.2 The TAC is disappointed that the Department has chosen to consult using an Equality Impact Assessment. Whilst the TAC welcomes the proposals to extend the present Concessionary Fares Scheme to wider groups of disabled people the Committee feels that the nature of the proposed extension should have been the subject of a much more comprehensive consultation.
- 2.3 The TAC has met specifically to discuss the EQIA. Many issues were raised by Committee members which were not relevant to the EQIA but are relevant to the development of a fair, effective and comprehensive Concessionary Fares Scheme.

It is the main recommendation of the Committee is that the Department undertake a more comprehensive consultation on the future of the Concessionary Fares Scheme. Recommendations

arising out of such a consultation should then be subject to an Equality Impact Assessment.

- 2.4 To assist the Department the TAC response is divided into two sections. The first is comment on the EQIA. The second raises the issues, which cannot be addressed in the current consultation.
- 2.5 The TAC commends the Department for advertising the availability of the consultation document in accessible formats as well as the providing a textphone contact number for people who are deaf or hard of hearing. This has not always been included in previous consultation by the Department.
- 2.6 The Committee would like to request that the Department add the TAC to the list of organisations consulted under their Equality Scheme.

3 Comments on the EQIA

The aim of the policy

- 3.1 A major weakness of the EQIA is that the Department has failed to identify what the aim of the present Concessionary Fares Scheme is. Instead the Department has listed the current eligibility for the scheme and the proposed extension to groups of disabled people.
- 3.2 The Department should have outlined the reasons why there is the need for a Concessionary Fares Scheme. Fundamentally this is because for some groups in society cost is a potential barrier to using transport. The Department should also have identified the role concessionary travel plays in the Departments wider approach to targeting social inclusion.

The use of information and data

- 3.3 The Department has used only statistical data to assess the policy. This has identified the number of people who benefit or are likely to benefit from the scheme. The failure by the Department to clearly identify the aim of the Scheme means that broader research into the role of concessionary travel could not be presented. In Northern Ireland the General Consumer Council has highlighted the issue of cost as a barrier to travel through its report "The Transport Trap –How transport disadvantages poorer

people”. Specific research into the role of concessionary fares elsewhere in the UK has been undertaken by The TAS Partnership.

- 3.4 The Committee do believe that the Department could have given more information on how concessionary fares works in the rest of the United Kingdom to provide a contrast with the scheme in Northern Ireland. The changes since the Transport Act 2000 has made provision for at least 50% reduction for older and disabled people on bus journeys. The Department for Transport has also developed guidance on the groups of disabled people eligible for concessionary travel.

A simple assessment would have provided the following information to consultees:

- People in Northern benefit from concessionary travel on bus and rail services. The concession is only available for bus services in the rest of the UK.
- People in Northern Ireland can benefit from the concession at all times. In other areas of the UK travel is restricted to off-peak.
- The age for eligibility for older people in Northern Ireland is 65 in the rest of the United Kingdom it is 60
- There are proposals for four groups of disabled people to be eligible for concessionary fares in Northern Ireland, in the rest of the UK there are seven groups eligible. Those not included in Northern Ireland are:
 1. People who are profoundly or severely deaf
 2. People who are without speech
 3. People who have a disability, or suffered an injury, which has a substantial and long-term adverse effect on their ability to walk
 4. People who do not have arms or have long term loss of the use of both arms

Assessment of impact

- 3.5 The Department has identified that there are no adverse impact on any of the equality groupings. The Committee disagrees with the Departments assessment with regard to gender. Whilst men and women are both eligible for concessions at 65, the retirement age for women is 60. Women therefore have to wait five years for the concession after retirement. This is not the case for men. The contrast with the rest of the United Kingdom shows that women are eligible for the concession at 60. This means that women are at distinct disadvantage in Northern Ireland when accessing concessionary travel.
- 3.6 With regard to disability the Department argues that there is a positive differential impact. Whilst this is true in simplistic terms it ignores wider issues and inequalities arising from the present proposals, which cannot be addressed through EQIA.

Some examples of inequalities are:

- Some disabled people will be eligible for free travel others only half price. For example registered blind people can get free travel, people who are partially sighted only half fare. This is despite the fact that the barriers faced by both groups are essentially the same.
- Some older people continue to pay for services such as door-to-door transport essential because of their disability whilst others have free travel on buses and trains. For example older people using Bridge Accessible Transport in Derry have to pay £1 per trip, older people using Translink services in Derry pay nothing.
- Many disabled people will not be able to avail of the concession because bus and rail services are not accessible to them.
- For many people living in rural areas public transport provision is inadequate. This produces a further inequality between those who live in urban areas and those who live in rural areas.

Reasonable alternatives

- 3.7 The Department should equalise the eligibility age for older people for concessionary travel at 60 not 65.

- 3.8 The proposals as presented in the consultation document do not represent a fair and effective way of delivering comprehensive concessionary travel. However the narrow focus of the Equality Impact Assessment means the Committee cannot make appropriate suggestions for improving the Scheme. The TAC recommends a wider review of the Concessionary Fares Scheme.

4 Recommendations for Improving Concessionary Travel in Northern Ireland

Why have a Concessionary Fares Scheme?

- 4.1 Concessionary fares are a means of allowing people to access transport by overcoming the barrier of the cost of travel. Cost is only one of many barriers disabled people and others face when trying to access transport in Northern Ireland. Buses, trains, taxis and transport infrastructure can present major physical access problems for disabled people. Transport is often not available when and to where the person wishes to travel. Other factors such as staff attitude, weather conditions, access to information and safety fears can seriously affect the ability of someone to access transport.
- 4.2 Concessionary fares must be viewed as part of an integrated approach to tackling barriers to travel. In the past this integrated approach by has not always been apparent in the Departments transport policy. However the Regional Transport Strategy and the proposed Accessible Transport Strategy has the potential to correct this.
- 4.3 Consultation on the present Concessionary Fares Scheme should have afforded the opportunity to broaden the debate on the role of concessionary travel in breaking down travel barriers. A review of the role of concessionary travel must form a part of the development of the proposed Accessible Transport Strategy.

Integrate the Concessionary Fares Policy

- 4.4 Concessionary travel policies must not exist in isolation. They must form part of an overall strategy to promote social inclusion. The policy must link in with the Departments other policies such as

the modernisation of public transport, the Rural Transport Fund and the Transport Programme for People with Disabilities. The present Scheme must be made more comprehensive to reflect the breadth of services these policies provide.

The TAC recommends that the Department examine ways the concessionary fares scheme can integrate with and promote other policies, which enhance social inclusion.

Extend eligibility

4.5 More groups of disabled people must be eligible for the concessionary fares scheme. Statistics show that disabled people are likely to live on lower than average incomes. Whilst the Department's proposal to extend the Scheme to four more groups of disabled people is welcome the TAC believes more disabled people should be eligible for concessionary travel.

The TAC recommends the Department look at other ways to include more disabled people in the Concessionary Fares Scheme using the DfT Guidance as the minimum standard.

4.6 The TAC believes that the present age for eligibility for older people is unfair as it discriminates against women and is less favourable to other schemes in the United Kingdom.

The TAC recommends that the eligibility age for older people be lowered to 60.

4.7 As part of a wider approach to promoting social inclusion the Department should examine cost as a barrier to other groups accessing transport.

The TAC recommends that the Department explore the possibility of extending concessionary travel to more socially excluded groups.

Equalising the Concession

4.8 The TAC is extremely concerned that the Department proposes to introduce two levels of concessions. The TAC believes this fundamentally unfair. All the groups affected experience similar problems with regard to the cost of travel.

The TAC recommends that the Department offer free travel to all older and groups of disabled people.

Broadening the remit of the Scheme

4.9 The TAC is extremely concerned that extending the scheme in its present form will have only minimal impact for disabled people. The scheme is restricted to bus and rail services. Many disabled people will not be able to access bus and rail services for sometime to come. Problems are compounded by the rural nature of Northern Ireland. Some disabled people use door-to-door services in Belfast and Derry as well as services operated by Rural Community Transport Partnerships. Whilst such services are generally available at a lower cost than public transport there is no links with the Concessionary Fares Scheme.

The TAC recommends that the present scheme be extended to cover present door-to-door services operated by Bridge and Disability Action in Belfast and Derry.

The TAC recommends that the Department examine how services operated by other community transport operators can be included in the scheme

4.10 Taxis are a popular mode of travel for disabled people as they offer a door-to-door accessible service. However the cost of taxi travel severely restricts the numbers of journeys, which can be made. Elsewhere in the UK schemes such as Taxicard are in operation. These allow disabled people access to a number of low-cost taxi journeys over a year.

The TAC recommends that the Department examine ways that concessions can be made available for disabled people who need to use taxis.

Extend to include companion travel

4.11 In order to travel some disabled people may need the assistance of a companion. The TAC feels it is unfair to expect the companion to pay the cost of travel.

The TAC recommends that the Department examine ways concessions being made available to companions travelling with disabled people for the purpose of providing assistance.

Cost proposals

4.12 The TAC is aware that the proposals outlined will involve appropriate resources. The TAC believes there are many factors, which may limit the investment, required to operate a comprehensive scheme. For example one factor which will limit the uptake of concessions for disabled people may be the Motability Scheme in Northern Ireland.

The TAC recommends that the Department carry out thorough research into the costs of a comprehensive concessionary fares scheme.

5 Conclusion

5.1 The TAC welcomes proposals to extend the present Concessionary Fares Scheme to wider groups of disabled people. The Committee is disappointed, however, that the Department has chosen not to undertake a more detailed consultation on options for changing the present Concessionary Fares Scheme. The TAC believes that the under present proposals there are a number of anomalies and inequalities. It is the recommendation of the Committee that the Department carry out a major review of the role of concessionary travel.