



**Recommendations for improvements to the
application and renewal processes for the
Concessionary Fares Scheme**

(November 2019)

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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 key transport professionals. Its role is to advise Government and others in Northern Ireland on issues that affect the mobility of older people and disabled people.

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

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

About this report

As part of its Work Programme in 2019/20 Imtac agreed to examine the current application and renewal processes for the Concessionary Fares Scheme in Northern Ireland and make any recommendations for improvement.

How this report was compiled

In compiling this report the Committee identified and undertook several tasks. Firstly it looked at the current application and renewal processes for eligible groups of older people and disabled people. Secondly it looked at potential lessons to be learned from the administration of concessionary fares in other parts of the United Kingdom. Thirdly it identified key issues arising out of a review of the first two steps. Fourthly Imtac carried out consultations with a number of key organisations before finalising its key recommendations for improvement.

Current arrangements for application/renewal

Summary of concessions

Free discounted travel on buses and trains is available to anyone aged 60 and above in Northern Ireland. People aged 65 and above are eligible for free discounted all Ireland travel so a different pass is issued.

People who are registered blind or who are in receipt of a War Disablement Pension also have free discounted travel on buses and trains in Northern Ireland. People who are registered blind have free discounted travel north to south for “point to point” journeys.

There are five eligible criteria for disabled people to qualify for half-fare discounts on bus and trains:

- People in receipt of higher or lower rate Mobility Component of Disability Living Allowance (DLA)
- People in receipt of standard or enhanced Mobility Component of Personal Independence Payment (PIP)
- People certified as partially sighted
- People with a learning disability known to their local Health Trust
- People who have been refused a driving licence or had a licence revoked on medical grounds

Application process

The Scheme is administered by Translink on behalf of the Department which has overall responsibility for the Scheme. Everyone must apply for a SmartPass by completing an application form, currently only available in hard copy. Forms can be obtained at a Translink station or by requesting via telephone or email for a form to be posted. Forms cannot be completed or downloaded online.

Guidance notes are available to assist applicants to complete the forms and provide the right supporting information. These are available in hard copy or can be downloaded from the NI Direct website in PDF format only¹.

All applicants are asked to provide certain personal information including name, address, date of birth, National Insurance number and a signature. The forms must be counter-signed by someone other than a relative and a photograph supplied.

Other requirements for applicants vary depending on the SmartPass applied for. Older people must attend a Translink station in person, bringing their completed applications with supporting evidence of proof

¹ <https://www.nidirect.gov.uk/information-and-services/bus-and-coach-travel/free-bus-travel-and-concessions>

of identity and residence. People who are registered blind, partially sighted and eligible people with a learning difficulty must first post their completed application form to their Health and Social Care Trust for verification and then it is forwarded to Translink. People in receipt of qualifying benefits including DLA and PIP forward their completed forms directly to Translink by post.

People who have been refused a driving licence due to a medical condition must send their application first to the DVA and have it signed and stamped before posting to Translink. Some people who know they have a condition that means they are unable to drive may never have applied for a licence. To obtain the SmartPass these people must first make an application for a licence (with an upfront cost), declaring their condition. On receiving their refusal (with cost refunded) the applicant then completes the SmartPass application form, sends it to the DVA to have it signed and stamped before finally sending it to Translink.

Migration between SmartPasses

Due to the varied discounts provided by different categories of SmartPass, migration between SmartPasses is an inevitable part of the current Scheme. Current holders of the 60+ SmartPass are required only to complete a renewal form when applying for the Senior of 65+ SmartPass. Current holders of a Half-Fare SmartPass must complete a new application for a 60+ SmartPass. Holders of both the Registered Blind and the War Disablement Smartpasses are required to complete a new application to obtain a 65+ SmartPass. Anyone making a new application for a 60+ or a 65+ SmartPass must meet the other requirements detailed above including attending a Translink station in person.

Because of the free All Ireland discount it is to everyone's benefit to migrate to the 65+ Smartpass when they become eligible. There is some evidence, however, that some groups such people who are Registered Blind, prefer to retain their Registered Blind SmartPass as it indicates to Translink staff that they may require assistance.

Renewal process

All SmartPasses are subject to renewal every 5 years. Renewal forms are posted by the Department to the holder's address. Holders are required to complete a short form confirming their National Insurance number and date of birth and signing before returning the form by post.

Practice in Great Britain

Concessionary travel schemes in the rest of the UK are not directly comparable as differing national standards mean there are significant variations to eligibility and the level of discount. For the most part in England discounts are only available on off-peak bus services (after 9.30am). In Scotland and Wales there are no time restrictions on usage. In Great Britain both older people and disabled people are entitled to free travel discounts but compared with Northern Ireland most older people in England only become eligible on reaching retirement age (not at 60) and there are broader criteria resulting in more disabled people being eligible for discounted travel.

One major difference in eligibility criteria for disabled people relates to people who have a medical condition that prevents them from driving. In Northern Ireland this relates to people who **have been refused** a driving licence due to their condition, in the rest of Great Britain this relates to people who **would be refused** a licence due to their condition.

There are, however, several places where concessions more closely match Northern Ireland where comparison is useful. Similarities include access to discounted travel from the age of 60 as well as unrestricted use of public transport (including both bus and trains).

London

Residents of London Boroughs aged 60² and over are eligible for the 60+ Oyster Card which offers free concessions on a range of public transport for a one-off fee of £20. Once people reach retirement age, they migrate to a Freedom Pass.³ This involves signing a form confirming their previous details, not completing a new form. Eligible groups of disabled people can also obtain the Freedom Pass at no charge enabling free travel on a range of public transport services around London. The Freedom Pass also entitles holders access to travel discounts throughout England, although these are often less generous than the London scheme.

In London older people can apply for their Freedom Pass online, uploading the required information and evidence. Alternatively, the form

² <https://tfl.gov.uk/fares/free-and-discounted-travel/60-plus-oyster-photocard>

³ <https://www.londoncouncils.gov.uk/services/freedom-pass>

can be downloaded, completed and then posted with hard copies of the supporting evidence. Each London Borough has separate locations where forms can be obtained and where help completing the form can be provided.

Disabled people must apply for a Freedom Pass through their local Borough Council. For the majority, forms can either be downloaded from the council website or completed online. All applicants must provide evidence of their eligibility. In the case of refusal of a driving licence on medical grounds applicants can use official confirmation from DVLA as evidence. Alternatively applicants can also provide other supporting information as to why they cannot drive.

All Freedom Passes are renewed every 5 years with the requirements similar to Northern Ireland.

Merseytravel

Merseytravel is the passenger transport authority for the Merseyside area operating local bus, rail and ferry services including the administration of the Concessionary Fares Scheme⁴.

The Scheme is open to residents of Merseyside. Older people are eligible for free travel on local public transport from the age of 60. Once the person reaches retirement age they become eligible for free bus travel throughout England as well as continued free travel on local public transport. Merseytravel sends a new card to existing pass holders automatically without the need for further application.

Forms can be downloaded from the Merseytravel website or are available from one of six travel centres in the region. Completed forms can be posted with supporting evidence or brought in directly to the travel centres.

Eligible disabled people enjoy the same concessions as older people on local public transport. Forms can be downloaded from the Merseytravel website or picked up from the travel centres and either posted or returned in person to their local travel centre. All applicants must provide evidence of their eligibility. In the case of refusal of a driving licence on medical grounds applicants can use official confirmation from DVLA as evidence. Alternatively applicants can also provide other supporting information as to why they cannot drive.

⁴ <https://www.merseytravel.gov.uk/Tickets/concessions/Pages/default.aspx>

Online application is not currently available for older people or disabled people.

Renewals for both older people and disabled people are sent by post.

Scottish National Entitlement Card

In Scotland the National Entitlement Card⁵ enables holders to access a range of public services including travel. It entitles people aged 60 and above and eligible disabled people to travel for free on all buses in the country. It also offers free travel in certain circumstances for companions travelling with a disabled person.

Each local authority in Scotland has responsibility administering the National Entitlement Card. Some local authorities offer additional travel discounts including travel on local rail services.

Applications forms for the Card can only be obtained from the local authority and are only available in hard copy. All first time applicants must apply for the card in person with the necessary evidence – postal or email applications are not accepted. Disabled people must complete renewal applications and provide ongoing evidence of eligibility in person. Older people are not required to renew their card.

Emerging issues

In undertaking the review of current arrangements for application and renewal in Northern Ireland Imtac has identified a number of key aspects of the processes where improvements are required.

Firstly there are major issues with the accessibility of the application process. The availability of application forms in hard copy only is, in the view of Committee, unnecessarily restrictive, meaning that many people with a visual impairment in particular must rely on others to complete and send forms. More must be done to make the application process accessible, providing forms and guidance in a range of formats. Imtac believes there are clear lessons to be learned from practice elsewhere about how to make the application process more accessible.

Secondly many of the requirements placed on applicants are, in the opinion of the Committee, unnecessarily bureaucratic and may in some cases deter eligible people from applying for a SmartPass.

⁵ <https://www.transport.gov.scot/concessionary-travel/>

The requirements placed on people applying under the category for refused or had a driving license revoked on medical grounds are particularly problematic. Problems have been largely created by overly restrictive eligibility criteria, which ignores the reality that many people with a pre-existing medical condition will not apply for driving licence and contrasts with the more flexible and realistic criteria that is in place in the rest of the UK. The Committee has concerns that as currently worded the criteria for people who have medical condition that prevents them from obtaining a driving licence may be discriminatory.

Thirdly Imtac believes there is a strong case for simplifying and making the renewal process more accessible including introducing automatic renewals for some categories.

Finally the Committee believes that migration between the concessions should be made more straightforward and accessible.

Many of the issues outlined above are due to the variations in eligibility and concessions, resulting from largely piecemeal “political” changes to the scheme over the years. Imtac understands fully that any change to current eligibility and discounts would require a policy change and therefore ministerial approval. Because of this, the focus of this paper is necessarily about making administrative changes. However, this does not prevent Imtac from pointing out that equalising travel discounts for all older people and disabled people offers the best opportunity to improve and standardise the application and renewal processes.

Engagement with other stakeholders

Following on from the identification of issues the Committee undertook meetings with a range of stakeholder organisations to gauge opinion on whether issues identified were the most important and to identify other potential actions. Organisations involved were Age NI, Dementia NI, Disability Action, Guide Dogs Northern Ireland and RNIB. Other organisations approached included Mencap and Age Sector Platform but no response was received.

Feedback from the organisations consulted was overwhelmingly positive and supportive of the identified issues and potential improvements being proposed by Imtac. As a result of the engagement process Imtac has included a number additional suggested improvements such as changing the SmartPass card design to include tactile markings.

Key recommendations

1 Make the application process more accessible

It is essential that the application process is made more accessible to ensure that applicants can complete forms independently. Whilst hard copy application forms should be retained for people who prefer these other changes required include:

- Introducing application forms which can be downloaded directly from NI Direct and other websites
- Ensuring application forms are available in formats including a plain text word document and large print
- Introducing an online application process similar to the one that is currently used for applications for the Blue Badge in Northern Ireland
- Ensuring that guidance documents for applicants are available widely (including online) in a range of formats including PDF, a plain text Word document, large print and an Easy Read version
- Improving support available for people who may require assistance to complete the form including an option to complete over the telephone

2 Simplify requirements placed on new applicants

In addition to making the application process more accessible, requirements placed on new applicants should be simplified including the following measures:

- The requirement for all older people to attend a Translink station in person potentially disadvantages disabled older people and those living in remote rural areas. Imtac recommends the removal of the requirement for all older people to attend Translink stations in person, allowing the option for applications to be posted and, when available, to be made online.
- Reviewing the requirements for eligible disabled people to send forms for approval to statutory agencies, replacing and simplifying the process based on practice used elsewhere.

3 *Replace the current criteria and evidence requirements for people who have a medical condition that prevent them from obtaining a driving licence*

The current criteria for people who have a medical condition that prevents them from obtaining a driving licence is in the opinion of Imtac overly restrictive and potentially discriminatory. In particular Imtac believes the criteria does not take into account people who know they have a condition that prevents them from driving and who have never applied for licence on this basis. In Great Britain eligibility covers such individuals, in Northern Ireland current criteria forces people to make an application for a licence in the knowledge that this will be refused which is not reasonable in the view of Imtac.

The Committee is aware that changing eligibility should, in most circumstances, require ministerial approval. However the Department does have equality obligations to make reasonable adjustments to enable disabled people to access their services. Imtac believes that given the issues outlined in this report, it is appropriate for the Department to make a change to the eligibility criteria to include people who **would be refused** a licence as an interim reasonable adjustment in anticipation of formal ministerial approval for the change at a later date.

Imtac also recommends linked changes to the evidence requirements under this criterion to include:

- Allowing people to submit written evidence from DVA of refusal of licence
- Providing a questionnaire supported by medical evidence for people who would be refused a driving licence but have never applied

4 *Simplifying the renewal process*

As well as making application easier and more accessible Imtac recommends that the current renewal process be made more straightforward with measures including:

- Introducing automatic renewals for people who are registered blind and people aged 60 and over

- Introducing online renewals and renewals via the telephone/email (Transport for Greater Manchester currently offer online renewals⁶)

5 *Make migration easier*

The current eligibility and discounts under the Scheme mean that people are forced to migrate to different SmartPasses several times as they get older. This means that some people must complete more than one application to gain the discounts available. Imtac believes that this is unnecessarily bureaucratic and recommends that migration between concessions be simplified, requiring existing Smartpass holders to only provide proof of eligibility to obtain further concessions. In the longer term the position of the Committee is that equalising discounts available to both older people and disabled people will remove the requirement for migration in the first place.

6 *Change the design of current SmartPasses*

One practical change suggested through engagement with stakeholders is a change to the design of the current SmartPass card, introducing a tactile element to make it easy for people with a visual impairment to differentiate between their SmartPass and other cards. Further engagement is required with people with a visual impairment about the design of any new SmartPass.

⁶ <https://travelpass.tfgm.com/views/home.faces>