



Northern Ireland Concessionary Fares Consultation: Summary of Responses

June 2024

Main Report

June 2024

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1 Executive Summary

The consultation

1.1 The Department for Infrastructure (the Department) currently funds free and half fare public transport at all times of the day for those who qualify for a SmartPass under the Northern Ireland Concessionary Fares Scheme (the Scheme). The aim of the Scheme is to promote accessible public transport for members of the community who are most at risk of social exclusion.

1.2 As part of an ongoing Review of Concessionary Fares, the Department ran a 12-week public consultation, between 1 June and 24 August 2023, on changes to the eligibility criteria for the Scheme. The consultation survey sought views on 10 options aimed at:

- Making the Scheme financially sustainable, so that it can continue to be provided for years to come; and
- Ensuring the Scheme is targeted at members of the community who are most vulnerable, or liable, to social exclusion.

1.3 The 10 options were grouped into two parts. While all options aimed at aligning the eligibility criteria and provisions of the Scheme with its policy aim of promoting social inclusion, the first four options would also reduce the costs of the Scheme, thus helping to ensure its long-term sustainability.

Options which would reduce the cost of the Scheme	Option 1: Raising the age of eligibility for concessionary fares
	Option 2: Limiting SmartPass use to off-peak travel
	Option 3: Limiting SmartPass use to bus travel only
	Option 4: Application, renewal, and replacement fees
Options which would increase social inclusion	Option 5: Free travel for those currently receiving a half fare concession due to a qualifying disability
	Option 6: Companion passes for disabled people unable to travel alone
	Option 7: Extend the qualifying criteria for a Half-Fare SmartPass in line with other jurisdictions
	Option 8: Free transport for destitute asylum seekers and victims of human trafficking
	Option 9: Changes to the residence test
	Option 10: Proving residency

1.4 The consultation survey was accessible on Citizen Space, the Government's online consultation hub, and was also made available

on the Department's website in pdf, easy read, British and Irish Sign language video (with subtitles) and in alternative formats on request. As part of a programme of planned consultation, in addition to the consultation survey, the Department also sought feedback on the options from older people, people with disabilities, asylum seekers, and their representative organisations, through 17 face to face and online focus groups.

About the consultation responses

- 1.5 The Department received 20,138 responses to the consultation. These can be broken down as follows:

Types of response		Number	Percentage (rounded to 0 decimal places)
Petitions and Campaigns		12,687	63%
Petition Signatories	Initial petition statement followed by a list of signatories	11,801	59%
Campaign Responses	Standard Campaign Responses based on a standard text provided by the campaign organiser	668	3%
	Non-standard Campaign Responses comprising standard campaign responses which have been edited or personalised by the respondent through the addition of individual comments	218	1%
Substantive Responses		7,451	37%
Total responses received		20,138	100%

- 1.6 63% of the responses to this consultation took the form of petitions or campaign responses. In all of these, the respondents explicitly called for the age of eligibility for concessionary fares to remain at 60.
- 1.7 The remaining 37% of responses were substantive responses from individuals and organisations (submitted via Citizen Space, Easy Read, email and post).
- 1.8 Substantive responses comprised of responses from 7,343 individuals and 108 organisations. Among the latter, the majority received were from third sector or non-governmental organisations, political parties, and trade unions. 99% of all substantive responses were from individuals.
- 1.9 95% of substantive responses were submitted directly through Citizen Space and 3% through an Easy Read.

- 1.10 Not all respondents answered every survey question. The highest completion rate was for Option 1 (98% or n=7,245), while the lowest completion rate was for Option 10 (87% or n=6,440).

Analysis of responses

- 1.11 For the purposes of the analysis, the Easy Read responses and email comments from individuals were uploaded to Citizen Space. These were analysed with the individual and organisational responses submitted directly through Citizen Space. These collectively comprise the “Citizen Space responses” referred to throughout this report.
- 1.12 Citizen Space responses to Part A: Options to reduce the costs of the Scheme demonstrated:
- Almost three quarters (74%) of respondents stated a preference for the bus pass to remain at age 60.
 - If the age of eligibility is to be raised, two thirds (66%) of respondents favoured increasing age eligibility to 65 (rather than state pension age) and applying this change to new applicants only.
 - Almost 80% were in favour of older people continuing to be able to use their pass at any time; a higher number (94%) were in favour of people with disabilities being able to continue to use their pass at any time.
 - An overwhelming majority thought that both older and disabled people should be able use their pass on rail as well as bus (97% and 99% respectively).
 - Just over half (54%) of respondents were opposed to introducing a fee to cover the cost of administering the Scheme.
- 1.13 Among organisations, there was unanimous opposition to raising the age of eligibility for concessionary fares with the majority expressing strong reservations or serious concerns about the impact of this option on older people and other Section 75 groups.
- 1.14 Taking into account all responses received to the consultation, 91% of respondents were opposed to raising age eligibility.
- 1.15 Analysis of Citizen Space responses to Part B: Options which would increase social inclusion demonstrated:
- Just over 80% of respondents agreed with the proposal to extend free travel to people with a disability.
 - Approximately 79% were in favour of the introduction of a companion pass for disabled people who have difficulties using public transport.
 - 81% agreed the eligibility criteria for a SmartPass on the grounds of disability should be widened in line with other jurisdictions.

- Around one half (50.3%) were opposed to the Scheme being extended to include asylum seekers receiving asylum support and victims of human trafficking.
- Just over half (53%) of all respondents thought that the current residency test should be replaced with a different test e.g. primary residence test.
- Nearly three quarters (74%) of respondents thought that the list of proofs should be widened to make the Scheme more accessible to those older and disabled people who are already entitled to apply.

Key themes

1.16 Given the volume of responses, this report presents a summary analysis which focuses primarily on the key themes raised through the substantive responses (i.e., Citizen Space responses and organisational responses received via email or post).

1.17 Part A of the consultation document included proposals which would reduce the costs of the Scheme, whereas Part B included proposals which would increase social inclusion and, in some cases, the cost of the Scheme. As such, key themes presented differently across Part A and Part B of the survey.

Part A – Options 1-4

Theme 1 – Would increase social isolation and have a negative impact on well-being

1.18 Options which reduce the current provisions of the Scheme (raising age eligibility and limiting SmartPass use to off-peak times or bus only) were viewed as contradictory to the Scheme's main aim of increasing social inclusion and could, therefore, have a detrimental effect on older and/or disabled people currently using the Scheme.

1.19 These changes could restrict access to medical services; reduce people's ability to work or attend training, education or voluntary opportunities; result in people being unable to make their journey; and limit social interactions, all of which could increase social isolation and have a negative impact on mental and physical health and well-being as a result.

Theme 2 – Benefits delivered by the Scheme

1.20 Many respondents, including those who attended engagement events, commented on the value delivered by the Scheme in its current form, highlighting the economic, social and environmental benefits it delivers to both users and to wider society.

1.21 On many occasions, individuals commented that the SmartPass was a "lifeline", facilitating activities such as shopping, meeting friends, attending medical appointments etc. and thereby enabling people to live independently and participate fully in society. Many organisations

stated that these benefits outweigh the financial costs of delivering the Scheme and changes reducing current provision may have a knock-on effect on the NHS and other services.

Theme 3 – Minimal savings versus financial impact

- 1.22 Many were of the view that the proposed changes would offer minimal savings to the Department whilst having a significant financial impact on users of the Scheme, especially in the midst of the current cost of living crisis. This impact would be felt most by those from lower-income backgrounds, particularly older people, women, and people with disabilities.
- 1.23 Without access to the SmartPass, or with restrictions on use, people may not be able to afford to travel and this could increase social isolation for people within vulnerable groups. Whilst some were supportive of introducing a fee for the SmartPass, acknowledging that this would help to deliver savings by offsetting administration costs, many respondents felt that charging a fee for a SmartPass would financially impact most on the people the Scheme was designed to help.
- 1.24 Respondents also commented these changes could have an impact on the economy if people are travelling less or have less to spend due to having to pay to travel.

Theme 4 – Proposals could result in an increase in car journeys

- 1.25 The removal of free travel for those aged 60-64 and placing limitations on using the SmartPass on rail or travel before 09:30, could force people to travel by car, increasing both congestion and air pollution, which could, in turn, have a detrimental impact on human health. This would run contrary to the Department's efforts to deliver modal shift to public transport and deliver on net zero commitments.
- 1.26 Respondents also highlighted that changing the age of eligibility may mean people keep driving longer than was safe to do so.

Theme 5 – The SmartPass is an 'earned' benefit

- 1.27 It was clear from engagement events and consultation responses that the SmartPass is viewed as a benefit that older people feel they have earned. Respondents commented that they had worked all their lives 'paying into the system' and did not think the SmartPass equated 'free' travel but rather a return on their taxes from over 40 years of employment. Some respondents were also of the view that it would be unfair to charge a fee for the SmartPass on this basis also.
- 1.28 Many highlighted that the increase in State Pension Age meant that older people were working longer than they had initially anticipated and many looked forward to receiving their SmartPass when they reached 60 years of age.

Part B – Options 5-10

Theme 1 – A choice between vulnerable groups

- 1.29 A key theme highlighted by many respondents was that the options posed in the consultation document may unintentionally pit groups against each other. Many organisations were concerned that the public were being asked to make a choice between older people and other vulnerable groups, effectively ‘robbing Peter to pay Paul.’
- 1.30 Others were concerned that if the decision was made to restrict free transport for those aged 60-64 and then to extend the Scheme to others, such as asylum seekers, this could have unintended negative consequences for groups that are already at risk of social exclusion.

Theme 2 – The need to reduce overall Scheme costs

- 1.31 Many respondents highlighted that at a time when the Department is trying to reduce costs, it would not be feasible to widen the Scheme in any way. This theme was prevalent across a number of options including increasing half-fare to full fare for people with disabilities; the addition of companion passes for those unable to travel alone; and the introduction of free travel for asylum seekers and victims of human trafficking. Respondents were concerned that increasing costs would negatively impact on the Scheme as a whole and put the existing provision at risk.

Theme 3 – Proposals will promote social inclusion and improve quality of life

- 1.32 Respondents recognised that people with disabilities are often more reliant on public transport and may face additional barriers and challenges when using public transport due to the type or severity of their disability. Increasing the half-fare concession to full fare; introducing companion passes for those who are unable to travel alone; and widening the eligibility criteria for a Half-Fare SmartPass could promote social inclusion, reduce isolation, and generally improve mobility, health, access to opportunities (such as employment, education and training) and quality of life for those people with a qualifying disability.
- 1.33 This theme was also prevalent amongst answers to Option 8 - free travel for asylum seekers and victims of human trafficking, with respondents commenting that this group is one of the most vulnerable and socially excluded groups in society. Many respondents acknowledged access to transport as a key barrier to integration and the extension of the Scheme to this group was seen as a necessary measure to enable participation in society and integration into new communities.

Theme 4 – Proposals would bring Northern Ireland in line with other concessionary travel schemes

- 1.34 Recognising that concessionary travel schemes in other jurisdictions provide more generous provisions, many respondents were of the opinion that the Scheme should be in line with the arrangements in the UK and the Republic of Ireland so that all residents would have access to the same support as their counterparts. Proposals to increase half-fare to full-fare; the introduction of companion passes; widening the eligibility criteria for a SmartPass on the ground of disability; and changes to the residency test and accepted proofs of residence would mirror schemes in other jurisdictions as well as making the Scheme more accessible and available to those at risk of social exclusion.

Theme 5 – Proposals could open the Scheme to abuse and would be difficult to administer

- 1.35 Across both supportive and unsupportive comments respondents expressed concern that the proposals may be difficult to administer and could be open to abuse. If proposals were implemented, there would need to be strict eligibility criteria, control measures and sufficient checks put in place to ensure there was no abuse of the system.

2 Background

- 2.1 The Scheme was established to promote accessible public transport for members of the community who are most at risk of social exclusion. It aims to do so by providing free and discounted fares on public transport for the following groups of people.

Free travel for	Half fare for people who
Everyone aged 60 and over	Get the mobility component of Personal Independence Payment (PIP)
People who are registered blind	Have had a driving licence refused or revoked on medical grounds
War disablement pensioners	Have a recognised learning disability
	Are partially sighted

- 2.2 Concessions for these groups are provided on eligible scheduled services operated by Translink, and other participating operators, and are available at all times of the day on both bus and rail.¹

- 2.3 To ensure the financial sustainability of the Scheme and to safeguard it for future generations, the Department undertook a review of the Scheme which focused on ensuring the eligibility criteria aligned with the Scheme's policy aim of promoting social inclusion, while also considering opportunities to make the Scheme more affordable long-term. This involved reviewing the eligibility criteria to ensure these were aimed at and included groups most at risk of social exclusion and considering the conditions and provisions of the Scheme against those in other jurisdictions.

- 2.4 Following this review, the Department identified 10 options for public consultation. While all options aimed at aligning the eligibility criteria and provisions of the Scheme with its policy aim, some would also reduce the costs of the Scheme, thus helping to ensure its long-term sustainability.

Options included in the consultation

- 2.5 The 10 options were divided into two parts: Part A and Part B.

PART A: Options to reduce the cost of the Scheme

¹ Eligible groups can also avail of concessionary travel on community transport services, as well as the Strangford and Rathlin Island ferry services. These concessions are provided under bespoke arrangements, funded by DAERA (Assisted Rural Transport Scheme, ARTS) and the Department (Strangford and Rathlin Island ferry services) respectively, but are not part of the Scheme. It is likely that any changes made to the Scheme will be mirrored in these arrangements.

2.6 The options set out in this part of the consultation document included proposals to reduce the costs of the Scheme. When identifying options to reduce costs, the Department also considered the policy aim of the Scheme which is to reduce social exclusion for members of the community who are most vulnerable, or liable, to social exclusion.

Option 1 – Raising age eligibility

2.7 The Department put forward three options:

- Option A – make **no change** to the Scheme, leaving the eligibility rules as they are now.
- Option B – **remove the concession** from the 60-64 age group. This would mean that the age of eligibility for the SmartPass would **increase to 65** (the age of eligibility for the existing Senior (65+) SmartPass). The change would apply to existing users as well as new applicants.
- Option C – **remove the concession** from the 60-64 age group and **raise the age of eligibility to State Pension Age (SPA)**. The SPA for men and women is currently 66 and will increase to 67 between 2026 and 2028. This would apply to existing users as well as new applicants, however, for practical purposes those with a Senior (65+) SmartPass would continue to be able to use it.

Option 2 – Limiting SmartPass use to off-peak travel

2.8 This change would mean that a SmartPass would no longer permit people to travel before 09:30 on weekdays (Mondays to Fridays). A SmartPass user would have to pay a full fare if they wished to use public transport before this time. They would continue to be able to travel for free at other times, including at any time on Saturdays, Sundays and Bank Holidays.

Option 3 – Limiting SmartPass use to bus travel only

2.9 This change would mean that a SmartPass would no longer permit people to travel by rail. It would allow SmartPass users to travel on bus only.

Option 4 – Application, renewal and replacement fees

2.10 This change would mean that SmartPass users would pay a fee for applications, renewals, and replacement cards. An application fee would be paid when a person applies for a SmartPass for the first time; a renewal fee would be paid when the SmartPass holder applies to renew their SmartPass; and a replacement fee would be paid when a person applies to have a new card issued if their card has been lost or stolen.

PART B: Options to promote social inclusion

- 2.11 The options in this part were aimed at making the Scheme better targeted at those groups of people facing social exclusion, some of which would increase the costs of delivering the Scheme. The Department recognises that it may not currently be in a position to implement these changes in light of the significant financial challenges being faced, however, has consulted on these options now to inform decisions on future changes to the Scheme should the Department's budgetary position change.

Option 5 – Free travel for those currently receiving a half fare concession due to a qualifying disability

- 2.12 This change would mean that everyone who is currently eligible for a half fare concession would receive free travel on all bus and rail services.

Option 6 – Companion passes for disabled people unable to travel alone

- 2.13 This change would mean that, if a person is disabled and they are unable to travel alone, they may be entitled to a Companion SmartPass which would allow someone to accompany them on their journey.

Option 7 – Extend the qualifying criteria for a Half-Fare SmartPass in line with other jurisdictions

- 2.14 This change would widen the qualifying criteria for a SmartPass on the grounds of disability to align it more closely with other UK jurisdictions.

Option 8 – Free transport for destitute asylum seekers and victims of human trafficking

- 2.15 This change would extend the Scheme to provide free transport to all asylum seekers receiving asylum support and to victims of human trafficking.

Option 9 – Changes to the residence test

- 2.16 This change would remove the need for applicants to be permanently resident in Northern Ireland for a period of three months before applying for a SmartPass and replace it with the 'primary residence' test, which would allow those eligible for concessionary fares and intending to reside permanently in Northern Ireland to apply for a SmartPass immediately.

Option 10 – Proving residency

- 2.17 This change would extend the list of documentation that can be used to prove residency to ensure that the Scheme is open to all those who qualify on the grounds of age or disability on an equal basis.

3 Structure of the Engagement

Consultation survey

- 3.1 Prior to the development of the survey and the identification of the proposed options, significant background research was undertaken to examine uptake and usage of the SmartPass in Northern Ireland and the eligibility criteria and conditions of travel concessions available in neighbouring jurisdictions. Extensive research was also conducted on the likely impacts of the options in their proposed form, as set out in the Draft Equality Impact Assessment (EQIA), which was informed by early engagement with key stakeholders.
- 3.2 The consultation document and survey were developed over several months and the final draft comprised of 43 questions (both open and closed) that would be used to gauge public opinion on the proposed changes to the Scheme and the impact these changes may have on SmartPass users. The survey also sought comments on the draft EQIA.

Consultation process

- 3.3 The consultation was accessible on Citizen Space (the Government's on-line consultation hub), and also featured on the Department's website, for a period of 12 weeks from 1 June to 24 August 2023.
- 3.4 Individuals and groups could respond to the consultation in a variety of ways:
- Via the survey on Citizen Space
 - Via email to the dedicated Concessionary Fares Consultation Scheme mailbox
 - Via post

Reaching vulnerable and seldom heard groups

- 3.5 The Department is committed to hearing views from all members of society and particularly welcomed responses to the consultation from those groups who would be directly affected by changes to the current Scheme e.g., older people, people with disabilities, and minority ethnic groups.
- 3.6 The consultation team worked closely with stakeholders to ensure the consultation was as accessible as possible to individuals who fell within these groups.
- 3.7 Prior to the launch of the survey, a number of adjustments were made to the initial consultation document, including adjustments to the layout and the configuration of tables to make access easier for respondents who rely on assisted technology.
- 3.8 An Interactive EasyRead version of the survey was produced and alternative accessible formats, including large font paper copies and

language translations, were available on request. British Sign Language (BSL) and Irish Sign Language (ISL) videos, with voice over and subtitles, also featured on the consultation page of the Department's website.

Structured engagement

- 3.9 The Department held extensive pre-consultation engagement with a range of key stakeholders and, over the duration of the consultation, facilitated a number of focus groups comprised of target demographics to examine the potential impact of the proposed changes and to gain insight into the shared experiences of each group.
- 3.10 Seventeen events were held, usually comprising of up to 15 participants (excluding Department staff) with each session running for approximately one and a half hours each.²
- 3.11 Each event followed the same structure and commenced with a presentation by officials, after which participants were invited to discuss their thoughts on each of the options contained within the consultation document. The presentation was used to guide discussions and each group provided valuable insights into their experiences of the SmartPass and their opinions on the potential changes.
- 3.12 At the conclusion of each Focus Group, the Department produced a report on the session and captured the key contributions by each group under the discussion topics. Qualitative analysis of these events is set out in section 8. A full list of engagement events can be found in Annex B.

Promoting engagement

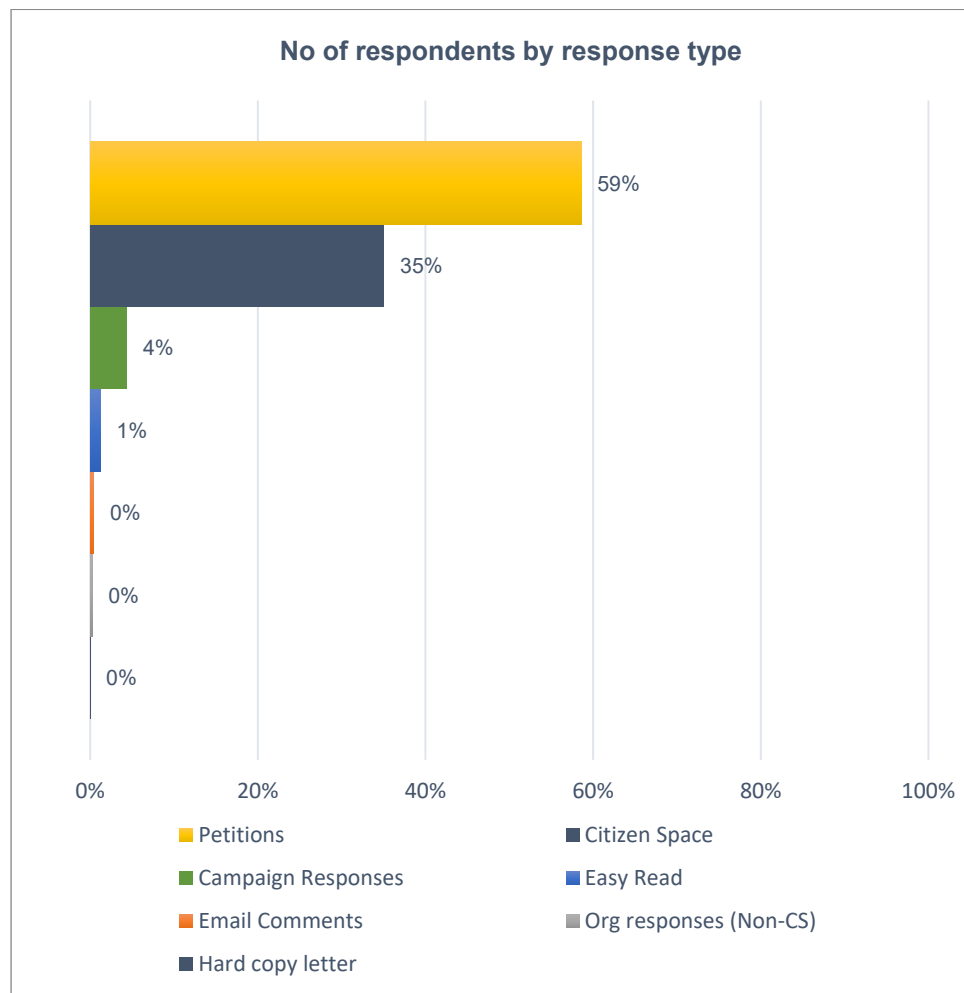
- 3.13 To reach the broadest possible range of individuals and groups, over 200 stakeholders were contacted via email when the consultation launched. A link to the online consultation survey was provided and groups were encouraged to share the link with others.
- 3.14 The consultation featured on the homepage of the Department's website. Throughout the consultation period, the key documents on the website achieved the following downloads:
- Consultation – 3,416 downloads
 - Easy read – 2,009 downloads
 - Key briefing – 945 downloads
 - EQIA – 503 downloads

² It was considered that smaller groups would allow for more focused discussion and would provide participants with an open forum in which their personal views could be expressed.

- 3.15 The Department's social media pages were also used to engage with the public and encourage participation in the consultation. During the consultation period, the following engagement was achieved on the main launch posts:
- X - 51k impressions, 1,276 engagements including 38 shares.
 - Facebook - 6.4k reach, 642 impressions, 705 engagements and 140 shares.
- 3.16 In terms of media engagement, the consultation was covered by a number of news outlets throughout the consultation period and featured on programmes such as BBC Newsline, BBC Talkback, the Stephen Nolan Show and UTV Live.
- 3.17 The consultation was also extensively covered by the daily and weekly press with articles in several national, regional and local newspapers.

4 Profile of survey respondents

- 4.1 The Department invited responses to the consultation through a number of routes: through the survey hosted on the Government's online Citizen Space portal; by email; or by post.
- 4.2 In total, the consultation received 20,138 responses from various sources, all of which have been analysed and feature in this document.
- 4.3 Each response was treated as equal in weight. This means, for example, that each response to the survey was counted individually and that organisations responding on behalf of their members were counted as one response even though they might have been representing multiple individuals.
- 4.4 The graph below shows a visual breakdown of responses by response type and source.



- 4.5 11,801 petition signatories (comprising an initial petition statement, followed by a list of signatories) from six different petitions accounted for 59% of all responses. Further analysis of petitions can be found in section 10 of this report.

- 4.6 35% of all responses were received directly via the Citizen Space portal (n=7,061, of which 7,004 were individual responses and 57 organisational responses).
- 4.7 A further 51 responses from organisations were submitted via email or via post. Submissions from organisations accounted for 0.5% of all responses. These responses have been analysed qualitatively alongside Citizen Space responses. Further analysis of Citizen Space responses and non-Citizen Space organisational responses can be found in section 6. A full list of organisational responses can be found under Annex A.
- 4.8 Interactive EasyRead forms and email comments accounted for 1% of responses, with 247 EasyReads received either via email or post and 91 email comments received via the dedicated mailbox. In some instances, email comments were submitted alongside a Citizen Space response. When identified, these were merged (where appropriate) and treated as one response.
- 4.9 EasyRead responses and email comments were manually uploaded to Citizen Space by the consultation team to allow for more efficient analysis of the data. Where responses contained a clear answer to one of the questions contained within the consultation survey, this has been uploaded to Citizen Space under the applicable section. Where there was no clear answer, comments were added to the survey under the most directly relevant 'open-ended' question and the content analysed qualitatively. Further information on how we dealt with these responses can be found in section 5.
- 4.10 One hard copy letter was also received which was analysed qualitatively alongside Citizen Space and non-Citizen Space organisational responses.
- 4.11 668 standard campaign responses were identified from three different campaigns (i.e. responses based on a standard text provided by the campaign organiser). An additional 218 non-standard campaign responses (standard campaign responses which have been edited or personalised through the addition of extra text) were submitted. In total, campaign responses accounted for 4% of all responses. Further analysis of the campaigns and campaign responses can be found in section 9 of this report.
- 4.12 The vast majority of substantive responses (99%) came from individual members of the public, of which over 56% were aged between 60-69 years of age and a further 19% were aged between 50-59 (where age was provided)³. The majority of individual

³ 88% of all Citizen Space respondents answered Question 35: Which of the following age bands do you fall into? (n=6168)

respondents (72%) were also SmartPass holders⁴ with 98% of these holding either a 60+ SmartPass, or a Senior (65+) SmartPass.

- 4.13 It is therefore important to note that as the majority of responses came from individuals who could be directly affected by the proposals either now or in the near future, the results of this consultation may not be fully reflective of the views of wider society.

⁴ 88% of all Citizen Space respondents answered Question 39: Do you have a SmartPass? (n=6198)

5 Consultation Analysis approach

‘Cleansing’ of the data

- 5.1 To prepare and validate the responses prior to analysis, an exercise to ‘cleanse’ the data was undertaken.
- 5.2 When the consultation closed and all EasyRead responses and email comments were added to Citizen Space, a final report containing all responses was downloaded into Excel and saved in a secure folder on the Government’s internal network.
- 5.3 The consultation team initially identified duplicate or blank responses from the same individual or organisation manually using Microsoft Excel’s data filter tool. Where multiple responses came from the same individual or organisation, contact was made (via email) to confirm how the response should be recorded. If the respondent confirmed that the response was incorrect, it was deleted and resubmitted in the correct format.
- 5.4 In some instances, respondents had submitted an email comment via the Concessionary Fares Mailbox and had also completed a response to the consultation on Citizen Space. These responses were identified, merged and treated as one response. Blank responses were excluded from any further analysis.
- 5.5 This report presents a question-by-question analysis of the remaining responses to the consultation. As respondents answered both open and closed questions throughout the survey, a mixed method analysis approach was adopted.

Approach for quantitative data

- 5.6 The consultation included 33 quantitative questions where the respondents were asked to select their answer from a multiple-choice framework, such as “Yes”, “No” etc. The numbers of responses for each option were counted and are presented in section 6.
- 5.7 Not every respondent will have answered each question as there was no obligation to complete all sections of the consultation survey. In some instances, respondents only answered one section of the consultation document.
- 5.8 Both the proportion of respondents answering closed questions and the number commenting at open questions varied from question to question. To reflect this differing level of response, graphs are presented with different baselines, so the total shown in each case is the total number of respondents who answered that question.

Approach for qualitative data

- 5.9 The consultation included 11 open-format questions with free-text fields. In each instance, there was no limit on the amount of text

respondents could provide. Across all these questions, around 34,500 free-text responses were received through Citizen Space responses. There was significant variety in the level of detail, length, and style of the responses. While most responses were relatively short, some responses were detailed, particularly those from organisations.

- 5.10 Analysing these free-text responses involved the development of a coding framework. For this, a random sample of free-text responses for each open-format question was selected. These responses were manually reviewed and key themes in each identified and recorded in an Excel-based coding framework. This framework was updated as the analysis progressed and further themes were identified and added.
- 5.11 All Citizen Space responses to the open-text questions were then read in full by the consultation team, with thematic analysis of each response being conducted to capture the main opinions expressed by respondents in overarching themes, as well as to understand the reasoning behind answers. Responses for each question were recorded on the coding framework according to the themes that presented in each response. It was not unusual for responses under each open-ended question to contain more than one theme and this was recorded on the framework and has been reflected in the analysis.
- 5.12 Some respondents reiterated similar points across questions, particularly with reference to the raising of age eligibility for the SmartPass. For example, points made in support of retaining the existing eligibility criteria were often reiterated in response to questions later in the survey. In such cases, these points were considered to have been analysed under the earlier question.
- 5.13 In addition to the Citizen Space responses, the consultation received a further 51 responses from organisations, submitted via email or post, and one hard copy letter from an individual. In many instances, these responses did not follow the structure of the questions as laid out in the consultation document and were, therefore, not uploaded directly to Citizen Space. However, due to being similar in nature, they have been analysed qualitatively alongside the Citizen Space responses.
- 5.14 As with the open-text Citizen Space responses, each organisational response was read in full by the consultation team and a thematic analysis was conducted to capture the main themes that presented under each option. These themes were then amalgamated with the main themes arising from the open-text Citizen Space responses and analysed qualitatively.

Limitations of the analysis

- 5.15 It is important to note the limitations of this approach and the assumptions present throughout the analytical process.
- 5.16 One of the main limitations of the approach is that the “cleansing” of the data was completed manually. This means that the activity is at higher risk of human error. However, this was mitigated by a quality assurance process during which the Project Manager oversaw the task and conducted a review of the final database.
- 5.17 Qualitative analysis was also completed manually which again, allowed for potential error. To mitigate this, the consultation team were briefed thoroughly on the proposals set out in the consultation documents and were given detailed instructions on how to use the coding framework. The Project Manager reviewed the coded data to ensure that potential errors were picked up and addressed prior to analysis.
- 5.18 The coding framework was developed based on themes emerging from the responses and not according to pre-set categories identified by the analyst, however, each user of the coding framework has had an individual view on what the key concepts are. Therefore, the voice of the respondent, the coder interpreting the coding framework and the analyst drafting the report are all present.
- 5.19 Research shows that care should be taken when using a coding framework that attributes numerical values to qualitative data.⁵ The framework used allows prominent themes to emerge, however, these are not quantifiable in the same way as data gathered from quantitative questions. As a result, the themes are not presented in a way which attributes a number of responses to them. Instead, key themes are presented to reflect where a range of comments touch on the same issues.
- 5.20 Further to this, this consultation attracted a very large number of responses. It is important to bear in mind, however, that public consultations are not necessarily representative of the views of the wider population. Anyone can submit their views, and individuals (and organisations) who have a keen interest in a topic are more likely to participate in a consultation than those who do not. This self-selection means that the views of consultation participants cannot be generalised to the wider population.

⁵ Cresswell, J. (2013). Qualitative inquiry and research design: Choosing among five approaches. Los Angeles, CA, page 185

6 Analysis of Options 1-10

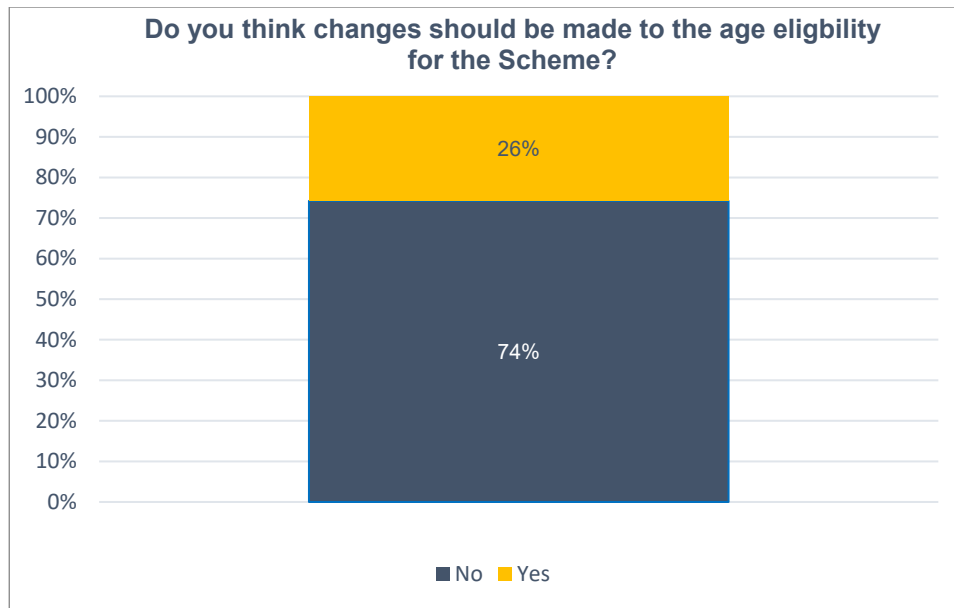
- 6.1 This section presents a question-by-question analysis of the substantive responses received to the consultation.
- 6.2 The **Quantitative Analysis** section under each option provides an overall indication of general support for or opposition to the proposals presented in the consultation from the responses received via, or uploaded to, Citizen Space. Not every respondent answered all questions so the baseline for each question presented below will vary.
- 6.3 The **Qualitative Analysis** section under each option provides an overview of the key themes emerging from the manual coding of responses from individuals and organisations. While the analysis cannot produce accurate counts of responses allocated to each theme, these are generally presented in order of prevalence within responses, with the key themes from responses in support of the proposals presented first, followed by the key themes from responses opposed to the proposal. In some cases, themes identified in the coding analysis were combined for the purposes of this section, where it made sense to do so.
- 6.4 Quotes from respondents are provided throughout to support the opinions and views raised in response to the questions in the consultation. The quotes used are intended to be representative of themes or views raised by multiple respondents. Direct quotes from responses specifying that they should not be published were not included.
- 6.5 Percentages have been rounded to the nearest whole number which means that, in some instances, percentages may not add up to 100%.

Option 1 – Raising age eligibility (Questions 1 – 4)

- 6.6 At present everyone resident in Northern Ireland can get a SmartPass when they reach 60.
- 6.7 At Question 1, the consultation paper sought views on whether changes should be made to the age eligibility for the Scheme.

Quantitative Analysis

- 6.8 Of the respondents who answered Question 1 (n=7245), 26% agreed that the age eligibility should be changed, while the majority (74%) think it should not.
- 6.9 The graph below shows a visual breakdown of all responses.

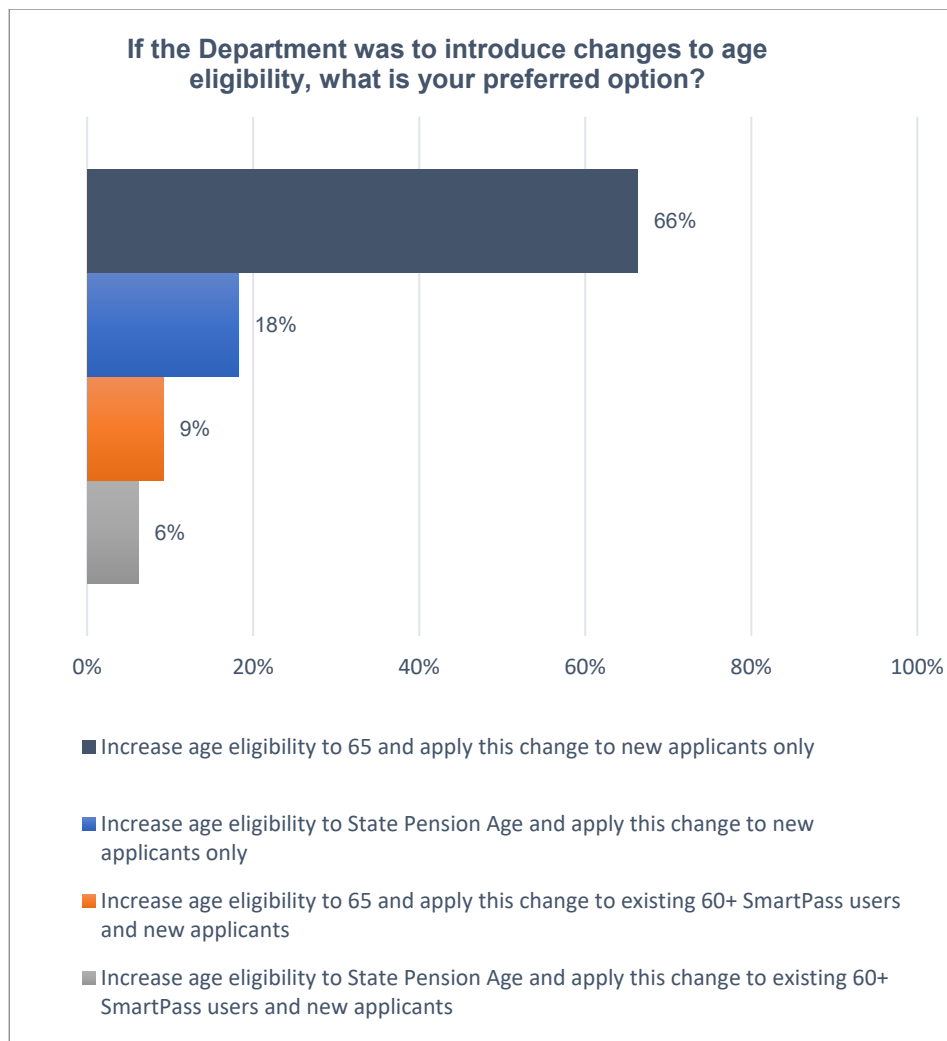


6.10 At Question 2, the consultation paper asked respondents to select their preferred option from four potential approaches to raising age eligibility.

6.11 Of the respondents who answered Question 2 (n=6472):

- two-thirds (66%) think that the Department should increase age eligibility to 65 and apply this change to new applicants only.
- 18% think that the Department should increase age eligibility to SPA and apply this change to new applicants only.
- 9% think that the Department should increase age eligibility to 65 and apply this change to existing 60+ SmartPass users and new applicants.
- 6% think that the Department should increase age eligibility to SPA and apply this change to existing 60+ SmartPass holders and new applicants.

6.12 The graph below shows a visual breakdown of all responses.

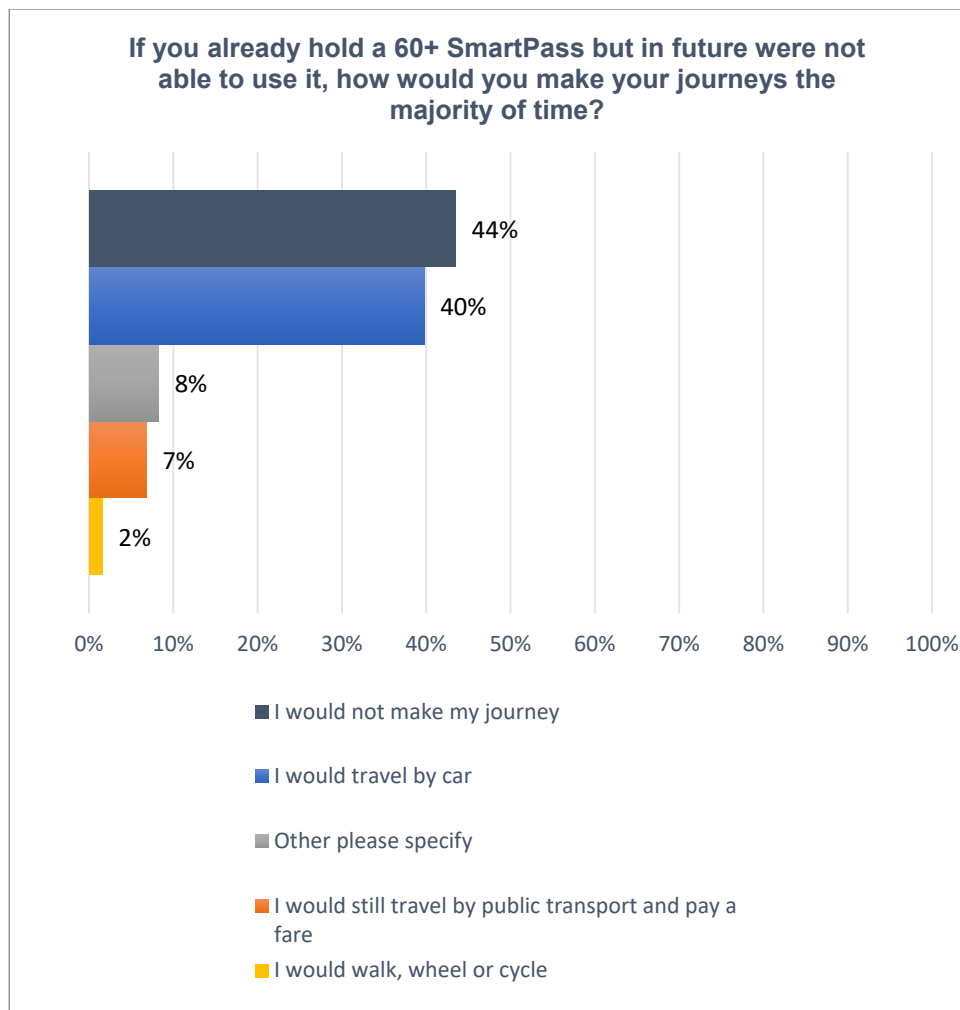


6.13 At Question 3, the consultation paper asked respondents how they would make their journeys the majority of the time if they held an age-related SmartPass but in the future were not able to use it.

6.14 Of the respondents who answered Question 3 (n=6153):

- 7% would still travel by public transport and would pay a fare.
- 2% would walk, wheel or cycle.
- 40% would travel by car.
- 44% would not make their journey.
- 8% would travel by other means.

6.15 The graph below shows a visual breakdown of all responses.



Qualitative Analysis

6.16 At Question 4 the consultation gave respondents the opportunity to provide comments supporting their answers. Respondents commonly raised the following points in their responses.

Still in employment and can afford to pay

6.17 A commonly voiced opinion from those supportive of changing age eligibility was that many people over 60 are still in employment and can afford to pay for travel. Some respondents commented that at this age many are at the top of their careers, have mortgages paid and no childcare costs. Free travel for this age group was therefore viewed as unfair to younger workers who have to pay a fare.

“Those people aged 60+ who are not working are likely to have work pensions and be able to afford public or private travel. It seems unfair that a 60 year old can get free travel to and from work when younger people who probably have more demands on their wages - mortgages, children - have to pay.”
(Individual response)

- 6.18 Many of these respondents were of the opinion that those still in employment should not have access to concessionary travel and took the opportunity to state their preference for the Scheme to align with SPA, or to be reserved for those who have retired.

‘Free transport is a benefit in kind and I believe it should be linked to state pension age and thus making it link with state pension age is the right thing to do. Those at 60-65 are of working age and it’s only right that they pay for bus/rail travel like those under 60.’ (Individual response)

- 6.19 Under this theme, some respondents also acknowledged the need to reduce costs in order to ensure the longer-term sustainability of the Scheme. As those aged 60-64 can afford to pay for travel, they believe raising the age eligibility is one way of achieving this reduction.

‘With the current pressure on public finances it is important to make savings without hurting those most in need. Many people aged 60 to 65 can easily afford to pay for public transport. Concessionary fares should be applicable only to those who really need this help.’ (Individual response)

Benefits delivered by the Scheme

- 6.20 Those opposed to changing the age of eligibility emphasised the financial, health, and social benefits the Scheme offers to the individual, as well as the economic, social and environmental benefits it delivers to wider society. These benefits were seen to far outweigh the costs of delivering the Scheme.

‘The DfI’s case for reducing eligibility is based on an internal accounting approach — ‘How much can be saved by this measure?’. Yet, the DfI’s analysis does not offer a detailed view of the overall social, health and economic benefits accrued to the whole of society through the 60+ SmartPass and therefore, it ignores the potential damage caused by the withdrawal of the Pass.’ (COPNI)

- 6.21 Individuals referenced the positive impact the SmartPass makes in their lives, with respondents using the SmartPass to meet friends; go shopping; take part in leisure and cultural activities; visit family; and attend medical appointments. Having a SmartPass facilitates these activities and enables people to live more independently and participate in society. For these users, the SmartPass is a “lifeline”, providing a means to “get out and about” and by doing so, helps their mental health, combats loneliness and improves their physical health.

“Free transport means I can visit my elderly friends regularly but could not afford to otherwise. It is a lifeline to us all and prevents loneliness.” (Individual response)

“I’m 62. I’ve used my pass to meet other older people in a social setting and this has greatly helped my mental health. My husband and I use our passes to go for walks which is benefiting our physical and mental health. Please don’t change the scheme as I feel upset at the thought of being restricted to the few streets where I live.” (Individual response)

Would increase social isolation and have a negative impact on wellbeing

- 6.22 Changing the age of eligibility was seen by many as a detrimental step which would leave people more socially isolated, with a negative impact on mental and physical health and well-being as a result.

‘While I understand that the budget for this scheme is under pressure, the scheme provides a vital means of transport [to] the older generation and helps provide links to the wider community. If this scheme is amended, I feel it could have a detrimental impact on the mental wellbeing of a large number of people forcing them to lose contact with friends and support organisations.’ (Individual response)

- 6.23 Some respondents highlighted this negative impact would have a knock-on effect on the health service, with declining levels of physical and mental health putting increasing pressure on the NHS.

‘Increasing the age of eligibility for the Concessionary Fares Scheme poses the risk of reducing activity levels amongst older people (60+). Considering the benefits of physical activity and the costs of physical inactivity, any potential cost savings from increasing the eligibility age may be outweighed by the secondary impact of reduced physical activity.’ (British Heart Foundation Northern Ireland)

- 6.24 Impacts for the economy and the charity sector were also referenced, as well as a potential impact on Translink’s finances and a risk to services generally due to less people travelling.

‘Any reduction in subsidy that could not be recouped by people continuing to pay for their journeys would in the first instance make a general public transport fare increase more likely. We are concerned that if the funding for concessionary fares to Translink is cut, many of these routes and services would have to be stopped. Any cut to the concessionary fare subsidy will be a cut to the overall Translink revenue and a threat to public transport for all its users, not just those currently eligible for a concessionary fare.’ (Consumer Council).

- 6.25 Responses from organisations also expressed the view that the proposal would be contrary to, and make it more difficult to implement, age-friendly and health and well-being policies and initiatives.

'It is the firm resolve of the Age Friendly Network Northern Ireland that if the proposed changes to the concessionary fares scheme are implemented, it will have a detrimental impact on the jobs of Age Friendly practitioners across all Councils in Northern Ireland to develop and implement their strategic Age Friendly priorities.' (Age Friendly Network)

'Reducing access to complimentary transport for 60-64 year olds run contrary to other NI Assembly strategies including loneliness strategies, which seek to increase social connections, and social proscripting within health which seeks to promote improved health outside of the formal health sector. Removal of complimentary travel for 60-64 year olds contradicts NI Assembly strategies including the PHA's 'Take 5' public health campaign.' (Engage with Age)

- 6.26 Others commented that the Department should, instead, be working alongside other Departments to develop a transport system that supports wider government services.

'Transport is a prime example of a service which would benefit from a collective, cross-departmental approach. It is pivotal to supporting effective policies and services led by other departments - for example, the departments of Health, Communities, Education, Economy, and DEARA all glean strategic benefits from transport provision.' (AGE NI)

Financial impact if SmartPass removed

- 6.27 Many respondents expressed concern that changes to age eligibility would have a detrimental impact on quality of life for many people if they could not afford to pay for public transport. Respondents highlighted the cost-of-living crisis and that raising the age of eligibility would exacerbate the financial challenges faced by those aged 60+.

'Cost of living research conducted by Age UK in 2022 found that around 65,000 households aged 60+ in Northern Ireland will have insufficient income to cover their essential spending, with around 25,000 (almost 40%) living in poverty or just above the poverty line and/or in receipt of benefits. Therefore, to raise the concessionary fare for older citizens from 60 to 65+ or the state pension age would burden tens of thousands of households who are already unable to cover essential spending.' (Irish Communist Party)

- 6.28 Some responses highlighted that 60-64 year olds are not, in all cases, high-earners. Organisational responses, in particular, commented that employment levels were falling for this age-group and many are, in fact, struggling with poverty.

'Whilst changes to the state pension age initially created more economically active people in this age group, this was reversed

as a result of the COVID-19 pandemic when many over 50s gave up work permanently. A recent report from the Joseph Rowntree foundation found that the age group for adults with the highest poverty rates was 60–64.’ (Consumer Council NI)

- 6.29 The impact would hit certain groups of people hardest, in particular those on a low income and women. Furthermore, women in this age range are particularly vulnerable as many who expected to retire at 60 have to work additional years due to the rise in pension age.

‘...those most vulnerable to social exclusion, who include people on the lowest incomes, as well as people with disabilities, are significantly less likely to work overall, and in particular less likely to work in the 60+ age categories, and therefore raising the eligibility age could worsen inequalities for this group of people, who also are least likely to have alternative travel options. This applies in particular to women aged 60-64 from lower income backgrounds, who often have undertaken unpaid work for long periods due to caring responsibilities, which in many cases prevent participation in paid work, due to factors such as lack of affordable childcare, lack of flexible employment terms, and lack of transport.’ (Women’s Platform)

- 6.30 Others commented on the financial impact the proposed change could have on the economy as a whole.

‘Many of the ‘cost-saving’ proposals are a false economy, in terms of long-term public health, and other unpaid services which support the economy such as providing childcare for family members so (mostly) women can participate in the labour market.’ (ICTU)

- 6.31 Respondents also expressed concern that this proposal could have a greater impact on those in rural areas, many of whom already have limited access to the public transport network and rely on community transport to make their journeys.

‘Any change in free and half fare concessionary passes will have a profound impact on rural areas, where usage and reliance on these passes is considerably higher amongst those using rural community transport/ rural dial a lift services which are by their nature and level of need more elderly and disabled and have fewer to no alternatives to Rural Dial A Lift which is supported through the DfI Rural Transport Fund and the DEARA Assisted Rural Travel Scheme.’ (Fermanagh Community Transport LTD)

Increase in car journeys

- 6.32 Another theme emerging from those opposed to changing age eligibility was that this would encourage more people back into their cars which would increase air pollution, having a detrimental impact on human health.

'Cars are a major contributor to air pollution. Research funded by the British Heart Foundation has shed light on how fine particulate matter, or PM2.5 for short, causes harm to the heart and circulatory system, contributing to the development of new health problems or putting people with existing conditions at increased risk of fatal events like a heart attack or stroke...Approximately 900 premature deaths in Northern Ireland were attributable to PM2.5 air pollution exposure in 2019.' (British Heart Foundation)

- 6.33 Respondents highlighted that changing the age of eligibility may mean people keep driving longer than was safe to do so. Others also commented that any increase in car journeys would be contrary to the Department's efforts to deliver modal shift to public transport and deliver on net zero commitments.

'No mention is made of the Net zero commitment nor air quality issues. I have sympathy for the department trying to balance its budget. However, it is much more important that as many people as possible use public transportation. Doing anything to reduce this is a wrong decision in the wider existential threat, the net zero commitment, the climate crisis and quality of life for NI citizens. Public transportation should be reviewed across NI government and have more funding to the direct services as part of a detailed net zero plan.' (Individual response)

An earned benefit

- 6.34 The SmartPass is seen as a benefit that people have earned and have been looking forward to, with many respondents expressing a belief that those who have paid taxes all their working lives should get something in return. In their view, raising age eligibility would be unfair to those who have been working from a young age.

'I have been working full time since the age of 18 and contributing to tax and National Insurance. Now that myself, and those of my generation, have reached the age to be eligible for a bus pass, the government is proposing to take this away from us for another 5 years. The same government that has raised the age for the receipt of state pension and is proposing to further raise it. We are putting more into the system for longer to get less out at the end. The proposals with the bus pass are just another kick in the teeth for us and are unfair, unjust and unacceptable.' (Individual response)

'Northern Ireland has some of the worst state pension rates in this part of the world and people aged 60-64 have paid for this scheme all their lives through payment of taxes. Forum members object to it being called Free Travel when we have covered its cost.' (South Belfast Lifestyle Forum)

Unfair to remove from existing users

- 6.35 Regardless of their support for or against changing the age eligibility, many respondents commented that removing the SmartPass from those who already have one would be particularly unfair as current users would have become accustomed to having a SmartPass and may have made choices (e.g., employment, lifestyle, financial) on the expectation that they would always receive free travel.

'It's not fair to take it off people who have it. Some will have made adjustments to their lives due to [the] pass and it's not fair to penalise them for being a certain age.' (Individual response)

- 6.36 Others were concerned about how removing the pass from existing users would work in practice.

'There are enormous issues with withdrawing passes from those who already have them, not least issues that will arise when a person attempts to use a pass that is no longer accepted. These people may not have budgeted to pay for transport on that occasion or in that month and may find themselves facing difficulties - stranded in a remote area, unable to get to work, unable to collect a child from school or nursery, unable to attend a doctor's appointment - as a result. In addition, they will face the indignity of having to disembark a bus or train, and, in the case of a rail commuter who embarked at an unmanned station, the danger of having to disembark between their origin and destination, perhaps with no way home.' (Women's Policy Group NI)

The scope of the Scheme should be widened

- 6.37 Organisations often commented that, rather than making cuts to the Scheme, the focus for the Department should be upon extending free public transport to all citizens.

'UNISON rejects the narrative that Northern Ireland must 'level down' to provision in Wales and some parts of England, where the minimum age of eligibility for a statutory concession is 66.....Countries such as Luxembourg, Estonia and Malta are extending free public transport to all citizens. This has had numerous benefits, including easing the burden of inflation and rising fuel prices, as well as helping to keep buses running on time due to costs being offset by savings on ticketing systems and fare enforcement. It is extremely disappointing that NI citizens are now fighting tooth and nail to keep existing concessionary fares.' (UNISON)

'The focus for the Department ought to be upon expanding concessionary fares, not cutting, withdrawing, or restricting the current scheme. In order to tackle carbon emissions and make significant progress towards our net-zero targets, we must encourage and facilitate an increasing number of people take an

increasingly large proportion of their journeys using public transport. This modal shift will not occur without significant investment in our public transport system. It must be more accessible and affordable. We are supportive in principle of any scheme or policy that facilitates the encouragement of more people onto public transport, including the use of subsidies.'
(Alliance Party)

Alternative Options

6.38 Many respondents, both those in favour of changing age eligibility and those against, put forward alternative options for managing the cost of the Scheme without raising the age of eligibility. These included

- providing a half-fare, rather than full, concession to those aged 60-64;
- charging a nominal fare for all concessionary journeys, for example £1;
- placing a limit on the number of free trips each individual can take, after which they would have to pay a reduced or full fare; and
- introducing means testing.

6.39 If the age of eligibility was to be raised, many respondents suggested phasing this in over a number of years, which would help people plan for the change and may mitigate against some of the more negative impacts.

Option 2 – Limiting SmartPass use to off-peak travel (Questions 5 – 8)

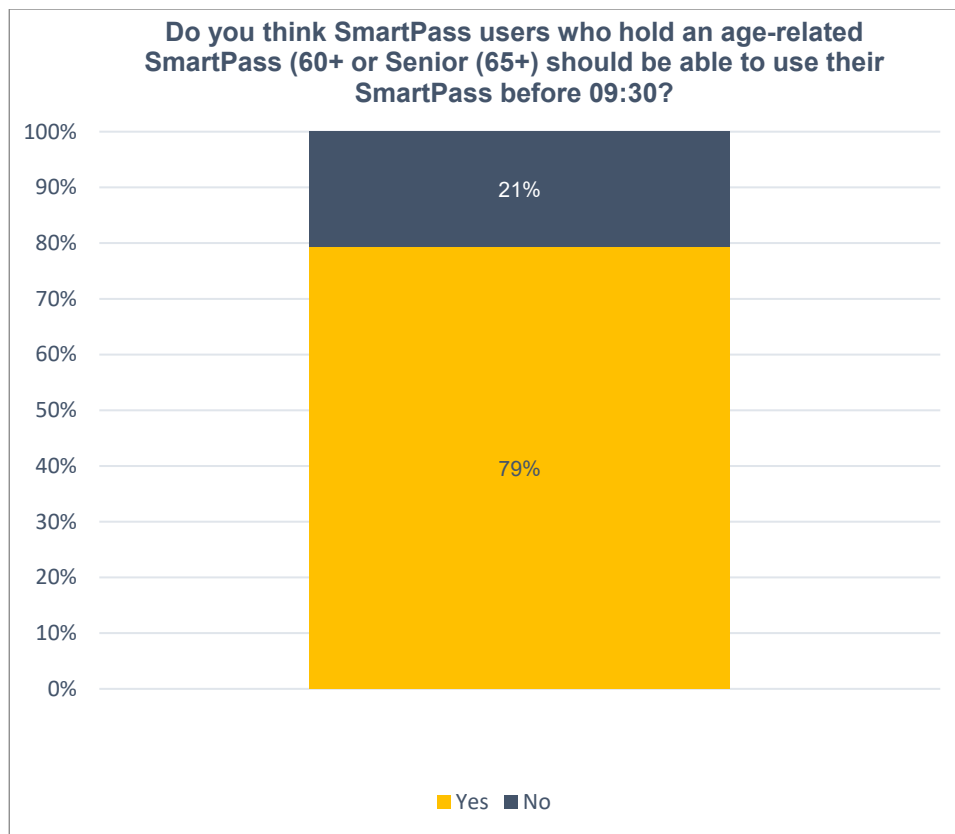
6.40 In Northern Ireland, SmartPass holders can travel at any time of the day.

6.41 At Question 5 the consultation paper sought views on whether SmartPass users who hold an age-related SmartPass (60+ or Senior (65+)) should be able to use their SmartPass before 09:30.

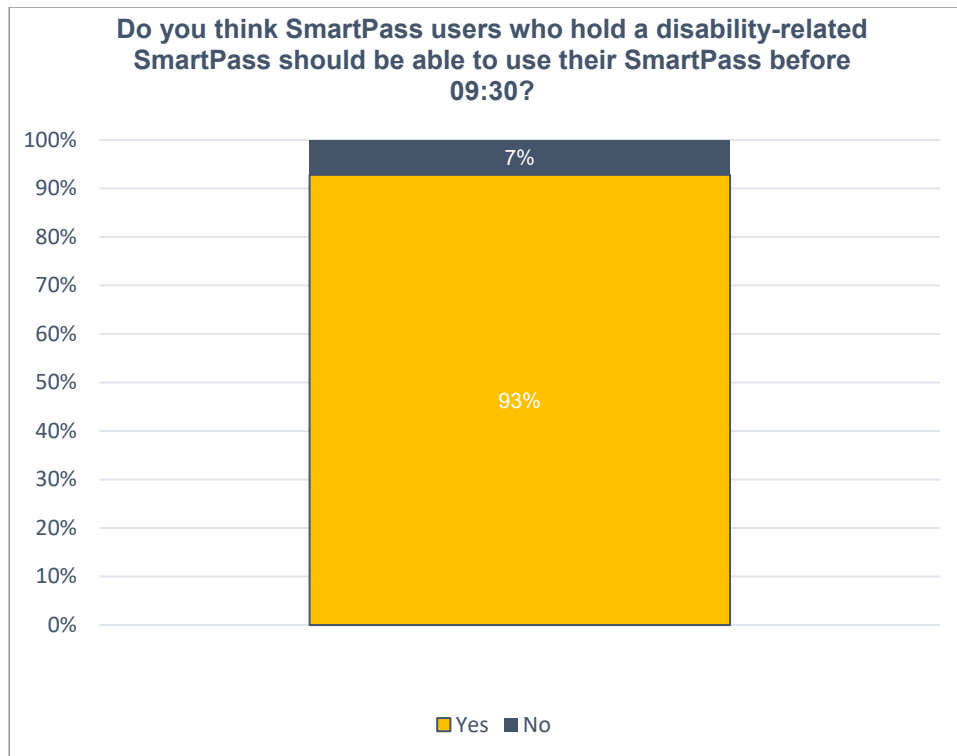
Quantitative Analysis

6.42 Of the respondents who answered Question 5 (n=7124), the majority (79%) think that SmartPass users who hold an age-related SmartPass (60+ or Senior (65+)) should be able to use their SmartPass before 09:30, while 21% think that they should not.

6.43 The graph below shows a visual breakdown of all responses.



- 6.44 At Question 6, the consultation paper sought views on whether SmartPass users who hold a disability-related SmartPass should be able to use their SmartPass before 09:30.
- 6.45 Of the respondents who answered Question 6 (n=7104), the majority (93%) think that SmartPass users who hold a disability-related SmartPass should be able to use their SmartPass before 09:30, while 7% think that they should not.
- 6.46 The graph below shows a visual breakdown of all responses.

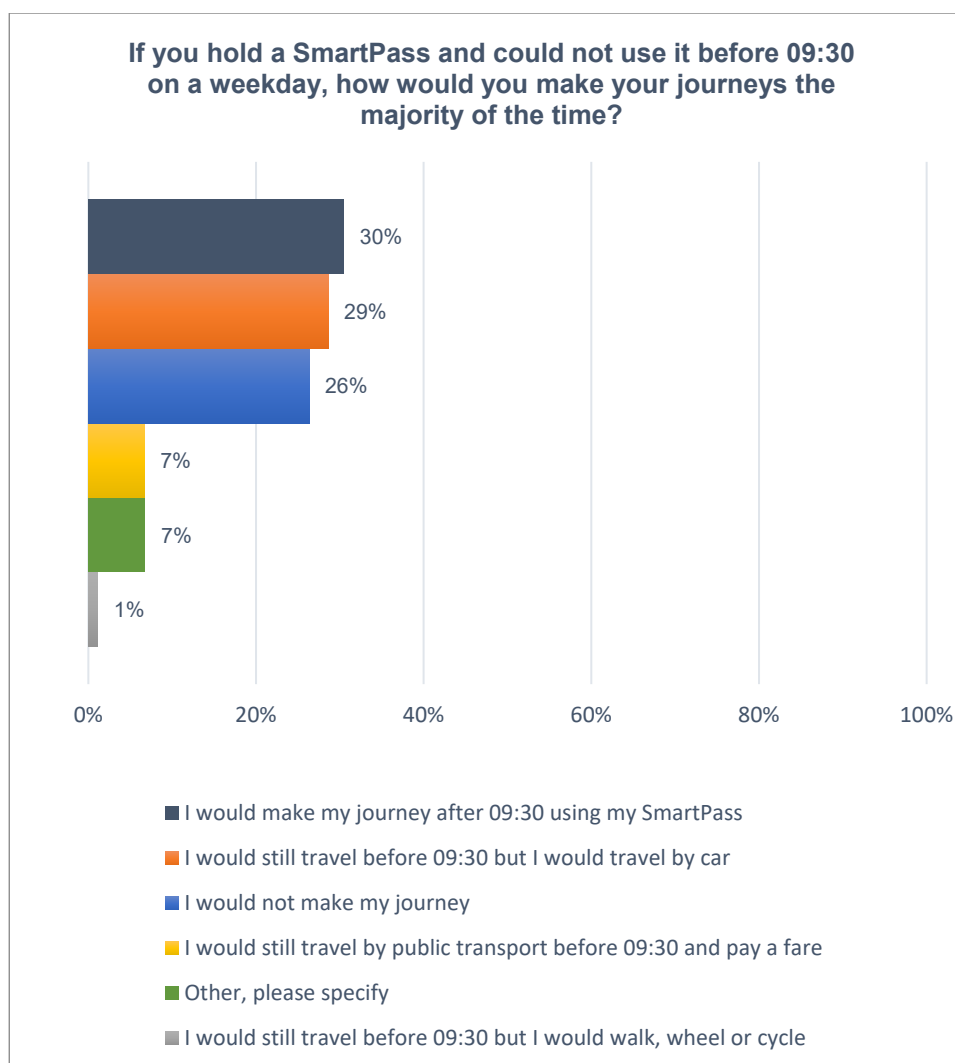


6.47 At Question 7, the consultation asked respondents how they would make their journeys the majority of the time if they held a SmartPass and could not use it before 09:30.

6.48 Of the respondents who answered Question 7 (n=6468):

- 7% would still travel by public transport before 09:30 and would pay a fare.
- 1% would still travel before 09:30 but they would walk, wheel or cycle.
- 29% would still travel before 09:30 but they would travel by car.
- 30% would make their journey after 09:30 using their SmartPass.
- 26% would not make their journey.
- 7% would travel by other means.

6.49 The graph below shows a visual breakdown of all responses.



Qualitative Analysis

6.50 At question 8, the consultation gave respondents the opportunity to provide comments supporting their answers. Respondents commonly raised the following points in their responses.

SmartPass should not be used to travel to work

6.51 A key theme amongst those who supported the proposal to restrict SmartPass use to off-peak travel only was that concessions should not be available for travelling to work. These respondents argued that those still in employment can afford to pay for travel and having a SmartPass is an unfair benefit that other working people cannot avail of. Some respondents qualified their remarks by commenting that those with disabilities and those over 65 should continue to be able to use their SmartPass before 09:30.

'I would suggest splitting the eligibility where 60+ SmartPasses can't be used for peak travel because it's more likely these

people are commuting to work at peak times. 65+ SmartPasses should be usable anytime.' (Individual response)

Would reduce crowding on services

- 6.52 Respondents also voiced the opinion that restricting travel to off-peak would help reduce crowding on services during peak times leaving more space for fare paying passengers and those travelling to work.

'The majority of people using public transport before 9:30am are using it for work related purposes - therefore should be able to afford the return fair. Also, those taking the train before 9:30am are taking up space on crowded trains for full paying passengers, which can put off recurring use from paying passengers due to bad experiences (e.g., no seat available for their morning hour long commute).' (Individual response)

Having the ability to travel early in the morning is essential

- 6.53 Many respondents opposed to restricting use of the SmartPass to off-peak only emphasised that being able to travel before 09:30 is essential and deemed it unreasonable to place time restrictions on SmartPass use and, by design, on people's ability to travel.

- 6.54 The most frequently cited need for early morning travel was attendance at medical and other appointments, which are often early in the morning or require considerable travel time to attend. Concern was expressed that removing this provision may mean that people would not be able to attend appointments which would have a negative impact on their health.

'With NHS services now being shared across NI many of our service users have to travel from Belfast to, for example, Downpatrick or Dungannon for hospital appointments. Restricting SmartPass times could have a significant and detrimental impact on being able to attend appointments, plus cause undue stress and anxiety on top of everyday living challenges in the current environment.' (Creative Local Action, Responses and Engagement (CLARE CIC))

- 6.55 Other reasons put forward for early morning travel included that it suits older people's lifestyle as they can be early risers, and long journeys often require an early start. Many respondents also highlighted that peak time travel is essential for those in rural areas, in particular, due to limited services being available outside peak times.

'Restricting access to SmartPass use off-peak would disadvantage those who live in rural areas, living with disabilities, from low income groups and those living further away from services, jobs and training opportunities. These groups for example are often required to make a number of longer bus journeys for access to health and social care

services that maybe mid-morning but still require the individual to start their journey earlier due to the lack of full integration of services.’ (Individual response)

- 6.56 Respondents also highlighted that retired people often have caring responsibilities or provide childcare for grandchildren, both of which require early morning travel.

‘The impact of changing the times at which the SmartPasses are usable to post-9.30am would be significant; it would at best significantly increase the financial burden on those who can afford it least, and at worst push people out of the job market or make it impossible for them to provide care to their grandchildren - a sacrifice that 55% of working parents in Northern Ireland rely upon.’ (Women’s Policy Group NI)

Would increase social isolation and have a negative impact on wellbeing

- 6.57 Another theme emerging from unsupportive responses was that restricting travel to after 09:30 would limit access to training, education, sport and leisure facilities and other support services which could have a negative impact on physical and mental health and lead to an increase in social isolation for many people.

‘Many of the Council’s concessions in community and leisure centres are specifically aimed at seniors with price reductions available during morning periods. As a result, restricting the time periods to use a SmartPass will directly impact on seniors accessing their local facilities to maintain and improve their health and well-being. Additionally, regularly attending classes and programmes at the Council’s facilities is a crucial lifeline for many people, providing opportunities for social inclusion and a positive, regular constituent to enhancing people’s lives.’ (Belfast City Council)

- 6.58 Some respondents also felt that it would impact on independence as people would have to rely on others for their journeys, which will have impacts on the wider family, particularly women who are more likely than men to provide care.

‘We believe that restricting the hours during which the SmartPass can be used would have adverse impacts for those on the lowest incomes and those most likely to be providing childcare which often falls to women.’ (Women’s Regional Consortium)

- 6.59 Under this theme respondents also commented that it would restrict people’s ability to work, particularly those with a disability, those in low-paid or shift work, or those working in a voluntary capacity.

‘Northern Ireland already has the largest employment gap between disabled people and non-disabled people anywhere in the United Kingdom. We are concerned that placing restrictions on concessionary travel could potentially further exacerbate existing inequalities and again prove counterproductive in reducing social exclusion.’ (IMTAC)

‘I volunteer with a charity and in a school, both of which require travelling well before 09:30am and in late afternoon. Without the SmartPass travel costs would make these activities financially unsustainable and both organisations would lose my contribution.’ (Individual response)

- 6.60 Respondents were also concerned restrictions could hinder employment opportunities for skilled workers in older age groups, which would in turn affect the Northern Ireland economy.

‘The Centre for Ageing Better outlines that the United Kingdom wastes a huge amount of talent, skills and experience by denying older workers the chance to stay in jobs or find new ones. This comes with a huge price tag for society, with thousands of people in their 50s and 60s who want to work shut out of the labour market for good. In an ageing society, with employers facing labour shortages and productivity challenges, they cannot afford to lose or ignore this part of the workforce. The proposed change would exacerbate the challenges detailed by the Centre for Ageing Better research. Limiting SmartPass usage to off-peak times would not only have an impact on older people but also on the Northern Ireland economy, which will increasingly be more dependent on the availability of people in their 50’s and 60’s to fill job positions.’ (South West Age Partnership)

This would deliver minimal savings and would have a negative financial impact on users

- 6.61 The data provided in the consultation document demonstrated that the majority of journeys currently being undertaken by SmartPass holders were during off peak times. In light of this data, respondents argued that this proposal would only deliver minimal savings.

‘From the statistics provided the majority of SmartPass holders use this facility off-peak. If you changed this to let SmartPass holders use the card off-peak, savings would be minimal.’ (Individual response)

- 6.62 While the majority of users may travel at off-peak times, respondents highlighted that this proposal would have a negative financial impact on those who have no choice but to travel at peak times and pay a fare.

'I would pay the fare if my journey was necessary especially for an appointment etc but I would have to make the saving elsewhere most likely on eating or heating.' (Individual response)

'I would have no choice but to pay to get to work on time but this would have a big impact on my ability to pay for other essentials.' (Individual response)

Increase in car journeys

- 6.63 A commonly voiced opinion was that removing free travel before 09:30 would lead to greater car use, which would increase both congestion and air pollution and would be contrary to government commitments on carbon reduction.

'If users who can currently travel at peak times for things such as hospital appointments - and have this removed - they will still make the journey but probably by car - and will therefore add to carbon emissions which we are trying to reduce.' (Individual response)

Other

- 6.64 Other themes from supportive and unsupportive responses included that the proposal would deliver savings; the proposal was reasonable as most journeys could be undertaken outside of peak hours; and Northern Ireland should retain parity with other schemes that provide free off-peak travel.

Option 3 – Limiting SmartPass use to bus only travel (Questions 9 – 12)

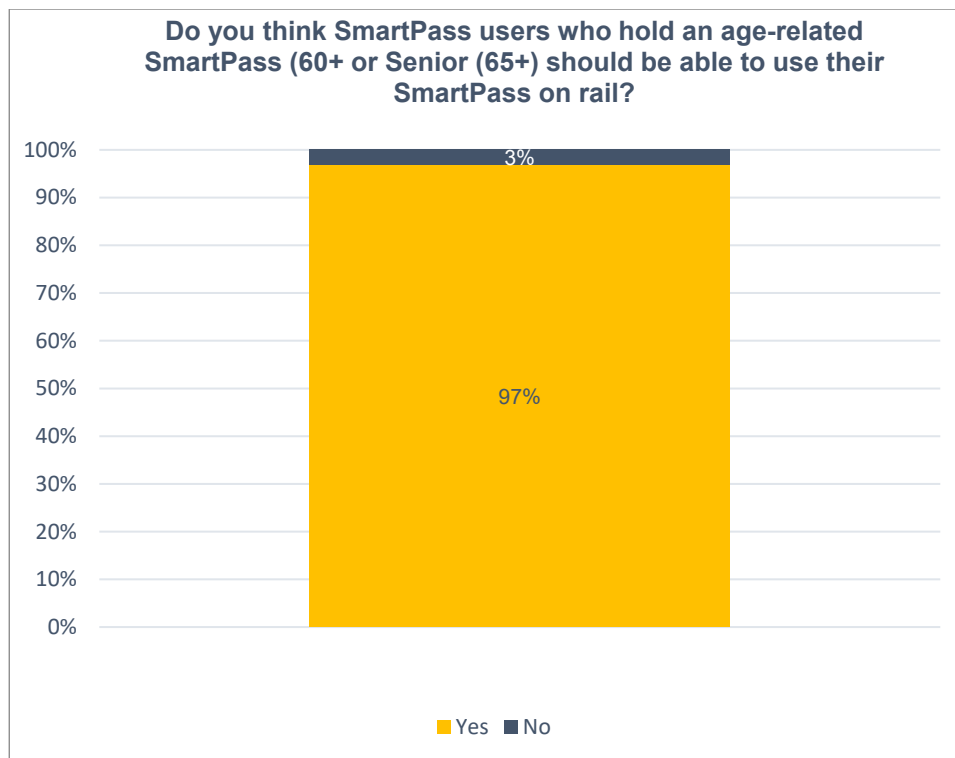
- 6.65 At present, SmartPass holders can travel on both bus and rail services throughout Northern Ireland.

- 6.66 At Question 9, the consultation paper sought views on whether SmartPass users who hold an age related SmartPass (60+ or Senior (65+)) should be able to use their SmartPass on rail.

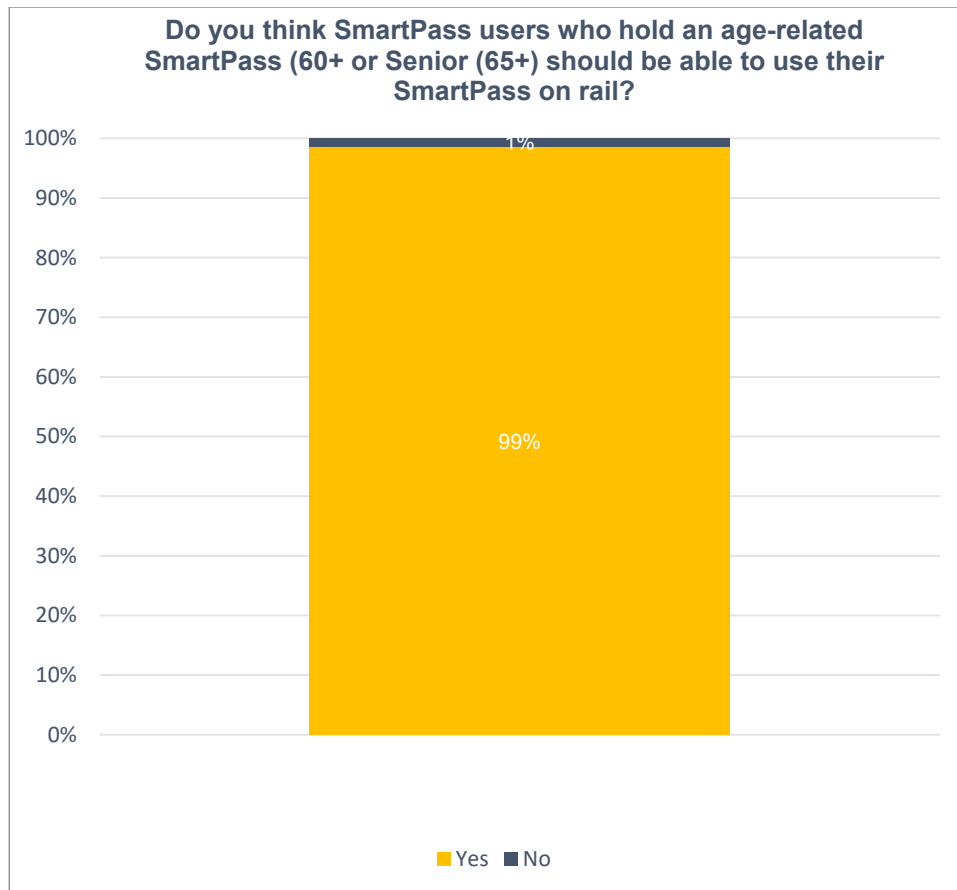
Quantitative Analysis

- 6.67 Of the respondents who answered Question 9 (n=7070), the majority (97%) think that SmartPass users who hold an age-related SmartPass (60+ or Senior (65+)) should be able to use their SmartPass on rail while 3% think that they should not.

- 6.68 The graph below shows a visual breakdown of all responses.



- 6.69 At Question 10, the consultation paper sought views on whether SmartPass users who hold a disability-related SmartPass should be able to use their SmartPass on rail.
- 6.70 Of the respondents who answered Question 10 (n=7058), the majority (99%) think that SmartPass users who hold a disability-related SmartPass should be able to use their SmartPass on rail while 1% think that they should not.
- 6.71 The graph below shows a visual breakdown of all responses.

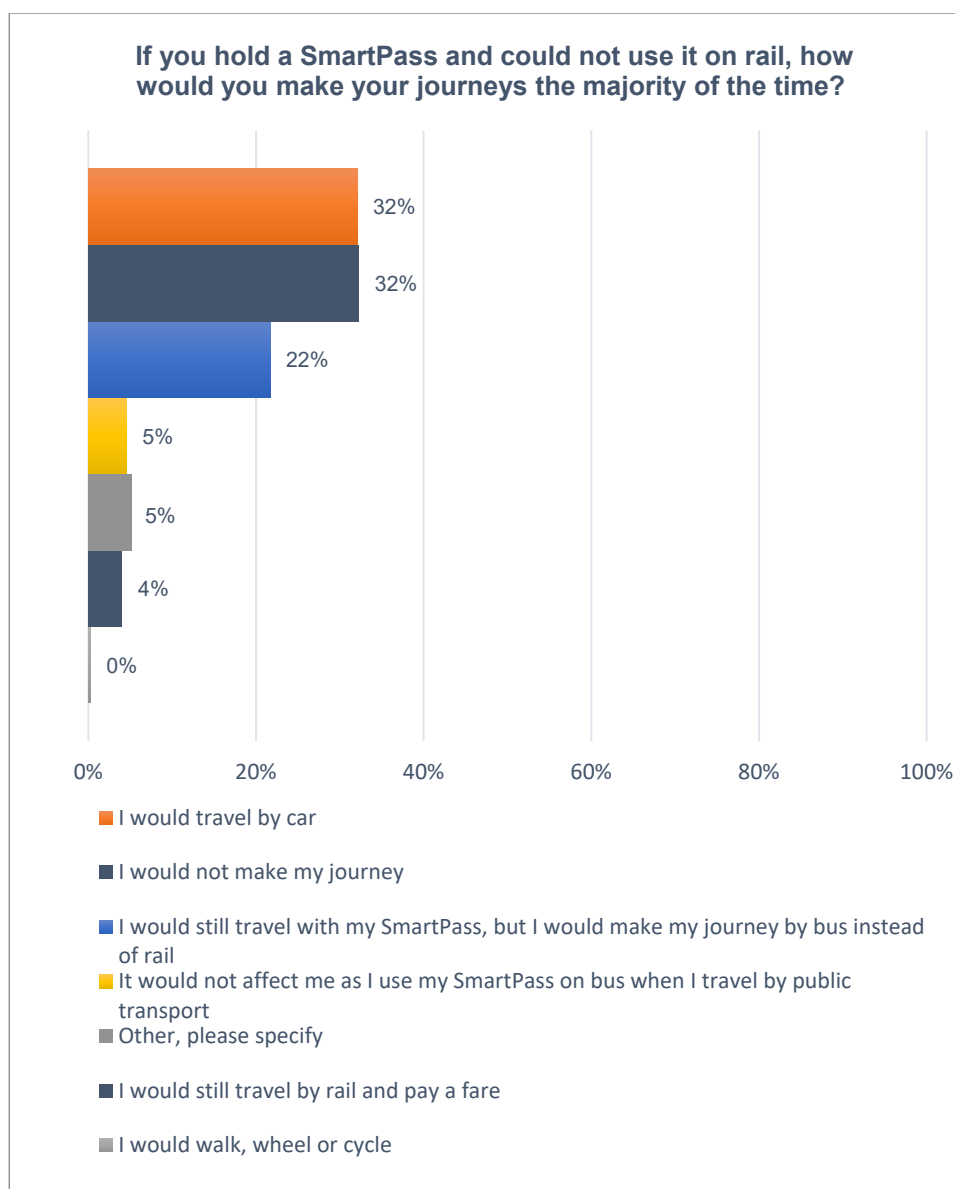


6.72 At Question 11, the consultation paper asked respondents how they would make their journeys the majority of the time if they held a SmartPass and could not use it on rail.

6.73 Of the respondents who answered Question 11 (n=6423):

- 32% would travel by car.
- 32% would not make their journey.
- 22% would still travel with their SmartPass but would make their journey by bus instead of rail.
- 5% would not be affected as they use their SmartPass on bus when they travel by public transport.
- 5% of people would travel by other means.
- 4% would still travel by rail and pay a fare.
- 0% (16 people) would walk, wheel or cycle.

6.74 The graph below shows a visual breakdown of all responses.



Qualitative Analysis

6.75 At Question 12, the consultation gave respondents the opportunity to provide comments supporting their answers. Respondents commonly raised the following points in their responses.

Would deliver savings and may have the least impact

6.76 Respondents who were supportive of limiting use of the SmartPass to bus only acknowledged the need to reduce the costs of the Scheme. They recognised that rail travel was more expensive than bus and, in their opinion, if savings needed to be made, this proposal would potentially have the least impact as most people would be able to make their journey by bus.

'The option of rail travel is a bit of a 'luxury'. Quicker and more comfortable. If it meant that the scheme could be kept open to all over 60's, then an acceptable sacrifice would be to exclude rail travel.' (Individual Response)

Rail is more accessible, convenient and flexible

6.77 Respondents who opposed limiting use of the SmartPass to bus only were of the opinion that rail travel is more accessible than buses for the elderly and people with a disability. Some buses with step access can be difficult to get on and off, particularly for those with mobility issues, and many only have one dedicated wheelchair space, meaning wheelchairs users cannot travel together. Lack of space generally means that those with large wheelchairs cannot use the bus and those with guide dogs can find it challenging. As a result, rail travel is the only option for some disabled people.

‘Rail is a comparatively accessible and comfortable mode of transport, including for people with disabilities, who may face significant barriers to bus travel due to its limited capacity to adapt to needs of disabled users, in particular wheelchair users. Restricting modes of travel would appear directly discriminatory and against S75, and therefore does not appear a realistic approach rooted in understanding of equality and DDA obligations.’ (Women’s Platform)

‘Our train network, and excellent support provided by staff, is a valuable transport option for many individuals living with a vision impairment. Many, particularly guide dog owners, find trains more accessible and comfortable with space for their dogs. Removing or limiting the use of the SmartPass would only further compound a limited choice of transport options.’ (Guide Dogs NI)

6.78 Others with certain medical conditions also find rail is their only option e.g., respondents highlighted that trains have toilet facilities which most buses do not and without which many people would be unable to make their journey.

‘I live quite far from Belfast. I mostly use the SmartPass to reach hospital appointments in Belfast. In no way would I attempt this journey by bus. It is too far and too long to be without access to a toilet. I could not cope with a bus journey.’ (Individual Response)

6.79 Rail travel was lauded as being more convenient, quicker and providing greater comfort than buses particularly for long journeys. Respondents also stated that rail services were often better for those living in rural locations and that some journeys did not have bus provision or could not be completed without using a combination of rail and bus. Having the option of both bus and train also gives greater flexibility in terms of the timing of travel.

‘If I were to make a full journey to Belfast city hospital going by bus with one change in Coleraine would take 4 hours one way, I

can go bus first part then by train in just over 2.5 hours.'
(Individual Response)

Would increase social isolation and have a negative impact on wellbeing

- 6.80 Given the issues highlighted above in relation to the accessibility of bus travel and convenience, many respondents expressed the opinion that removing rail travel would lead to an increase in social isolation for these groups of people who rely on rail as their only travel option. This would have a negative impact on health and well-being and would be contrary to the aims of the Scheme.

'Travel by rail is where I use my SmartPass most. Depriving me of this facility would lead me to stay at home, thereby increasing social exclusion, negatively impacting both my mental and physical health and leading to an increased cost burden on the health and social care system.' (Individual Response)

Increase in car journeys

- 6.81 Many respondents expressed the view that removing rail travel would lead to an increase in car use which would increase both congestion and air pollution and would be contrary to government commitments on carbon reduction. According to respondents, the Department should be trying to increase rail passenger numbers, not reducing them.

'Restriction of smart pass to bus only is short sighted. Rail travel is accessible and represents a lesser carbon output than cars. The electrification of the rail network will further improve the carbon issue. We are in an ENVIRONMENTAL EMERGENCY. We should be expanding the rail network and rail usage not restricting it.' (Individual Response)

Could impact on rail services and travel

- 6.82 Some respondents were concerned that the implementation of this option would lead to a significant loss in revenue for Translink which could impact on the future sustainability of the rail service.

'Implementation of Option 3, while having limited impact on the bus system would pose a massive challenge for the railway system. Under Option 3 the rail system would lose between 1.5 and 2.5 million passenger journeys per year and be faced with between £9.6 million and £16 million in lost revenue. The implications for the future operation and performance of the rail system are clearly very significant.' (Individual Response)

- 6.83 Organisations sometimes commented that this proposal could have a negative effect on future integrated ticketing arrangements and could make things harder for SmartPass holders who make their journeys across different modes of transport.

‘Limiting concessionary travel to bus services would appear to conflict with Translink’s support for future ticketing arrangements that are integrated and which allow the smooth transition between modes of transport. No data is provided on the level of concessionary fare journeys that routinely span both rail and bus services. However, if the aim of introducing integrated ticketing is to make travel more flexible and encourage more passengers to use public transport, the Department should also acknowledge that it would be wrong to withhold these benefits from senior citizens and those with disabilities by requiring them to purchase a separate ticket for the rail leg of their journey.’
(Democratic Unionist Party)

- 6.84 Some organisations were also concerned about how this proposal would work in practice for those who availed of free travel on cross-border services. With no changes to the All-Ireland Free Travel Scheme, pensioners from the Republic of Ireland could have unrestricted free travel in Northern Ireland while Senior (65+) SmartPass holders would not.

‘...The Department’s proposal to cease Senior SmartPass concessionary travel by rail, would result in an anomalous situation in which SmartPass pensioners from the Irish Republic will continue to enjoy unrestricted free travel in NI, whilst NI pensioners will not.’ (National Federation of Occupational Pensioners)

Other

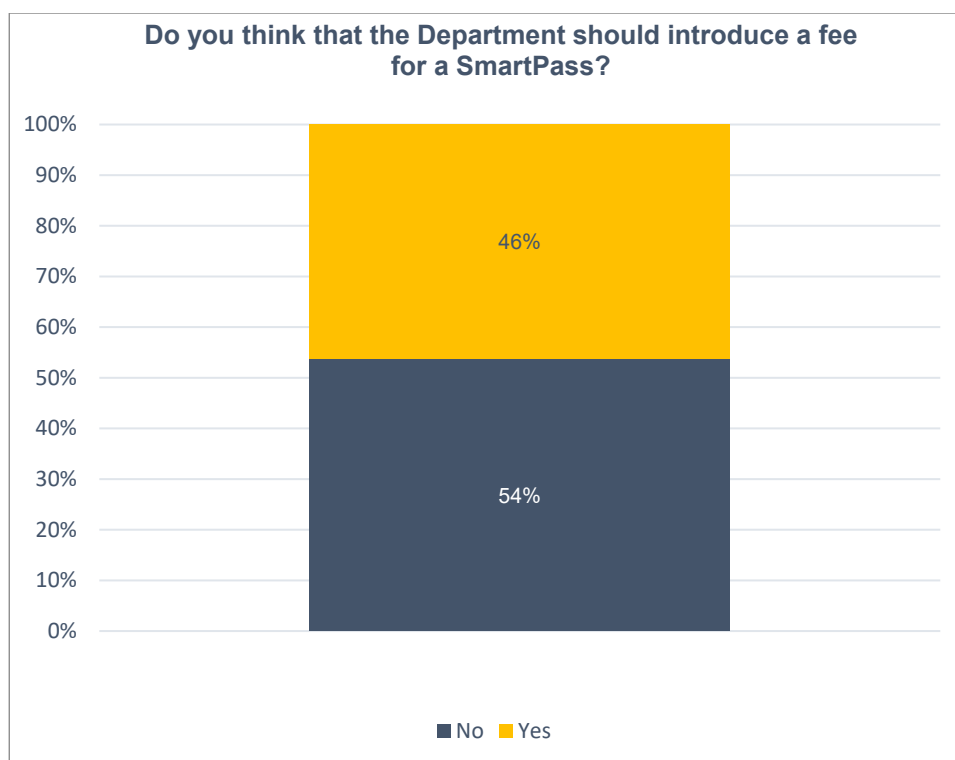
- 6.85 Other themes amongst responses included that removing rail travel would divert rail users onto buses which were often already overcrowded; it would deliver minimal savings; and that removing rail travel would bring Northern Ireland into line with other jurisdictions.

Option 4 – Application, renewal and replacement fees (Questions 13 & 14)

- 6.86 In Northern Ireland, applicants to the Scheme are not charged for the production or renewal of their SmartPass, even if the card has been lost or misplaced.
- 6.87 At Question 13 the Consultation paper sought views on whether the Department should introduce a fee for a SmartPass.

Quantitative Analysis

- 6.88 Of the respondents who answered Question 13 (n=7030), 46% agreed that the Department should introduce a fee for the SmartPass, while just over half (54%) think that it should not.
- 6.89 The graph below shows a visual breakdown of all responses.



Qualitative Analysis

6.90 At Question 14, the consultation gave respondents the opportunity to provide comments supporting their answers. Respondents commonly raised the following points in their responses.

A small fee may be reasonable

6.91 Many of those who supported the introduction of a fee were of the opinion that it would not be unreasonable to pay a small fee for a SmartPass if it helped to protect the Scheme, particularly given the savings it provides on travel. A fee may also help people value their cards which could protect against loss. Suggestions for the amount varied with the majority being between £5 and £10.

‘The cost to cover the administration fee seems reasonable, especially since the financial benefits to the individual far outweigh the proposed cost of applying for a SmartPass/replacing a lost or stolen pass. A side benefit might be to encourage people to be more careful with the Pass so as not to lose it.’ (Individual response)

6.92 However, some qualified their support by stating that while it would be acceptable to charge a fee to replace cards that were lost or stolen, there should not be a fee for application or renewal. Others still were content with an initial fee but not a replacement fee.

‘Charge only for replacing lost or stolen cards. If you want to get people to embrace public transport and get them out of their

*cars you need to provide an incentive to engage them!’
(Individual response)*

- 6.93 The financial impact on certain groups of society was also recognised by those supportive of introducing a fee and a number of respondents suggested an exemption for some groups, e.g., people with a disability and those in receipt of benefits, while others suggested it should be means tested. Organisations also supported exemptions for asylum seekers (should the proposal to extend the Scheme to asylum seekers be introduced) as they have limited income and would find even a small fee unaffordable.

‘The Law Centre proposes that the fee is waived for persons of low income. For example, persons who are in receipt of a “passport benefit” could be eligible for the fee waiver i.e. Income Support, Jobseeker Allowance (income-based), Employment & Support Allowance (income-related), Pension Credit (guarantee credit). Further, given their extremely low income the Law Centre considers that any eventual SmartPass fee should be fully waived for all asylum seekers and survivors of modern slavery.’ (Law Centre NI)

A fee would help offset administration costs

- 6.94 Those supportive of introducing a fee acknowledged that this would help to deliver savings by offsetting administration costs and may also deter people who did not intend to use the card from applying for one, further reducing administration costs.

‘I think a charge for a smart pass is reasonable and will help cover costs of the scheme. People who turn 60 just apply for the smart pass as there is no fee, and may never use it, if there was a fee to be paid a lot of people may not bother applying and only genuine users would apply.’ (Individual response)

This would be unfair to those who have paid taxes

- 6.95 A commonly voiced opinion amongst those opposed to the introduction of a fee was that the Scheme is a benefit for those who have worked and paid taxes all their lives and it would therefore be unfair to charge a fee for it.

‘When you are the age of 60 you look back and realise how much you have contributed to society. It is only fair and just to provide the 60+ age group free travel without charging a fee. There would be no justification to pay a fee.’ (Individual response)

A fee will be unaffordable for some groups

- 6.96 Another key theme amongst unsupportive responses was that charging a fee for a SmartPass would potentially make the Scheme unaffordable for many people who are on a low income, particularly

given the current cost of living crisis. Many respondents felt that introducing a fee would impact most on the people the Scheme was designed to help and would result in increased social isolation amongst this group.

'There should be no charges or fees incurred for using a Smart Pass. A large proportion of Smart pass users are on low/limited income some have disabilities. This would make their lives even harder with the rising cost of living. It would also deter me from using the service, which would drastically affect my mobility, increase my anxiety and social isolation as I have a limited income. The Smart Pass scheme in its current form helps me with the cost of living by saving on fuel costs.' (Individual response)

- 6.97 Organisations sometimes commented that imposing fees for lost or replacement cards could have a greater impact on vulnerable users of the Scheme.

'Mild memory and thinking problems as well as dementia can be experienced by those living with Parkinson's meaning they may accidentally lose items or not remember where they have placed them. Cards can be lost and misplaced for many different reasons, given the vulnerability of those who use the scheme this should be taken into consideration.' (Parkinson's UK NI)

The cost of administering the payment process will outweigh any revenue

- 6.98 Many respondents opposed the introduction of a fee as they felt the administration costs associated with charging a fee for application, replacement and renewal would be likely to outweigh any revenue raised from the fee.

'A fee and the associated bureaucracy will be a barrier to applications and will likely cost more than any income generated. There will be opportunity costs in diverting staff from productive work to chasing fees. In principle fees must be avoided as they are too easy to increase to negate the social benefits of the scheme.' (Individual response)

As a last resort to protect the Scheme

- 6.99 A number of respondents qualified their opposition to the proposal by stating that although they were opposed to the introduction of a fee, they would pay a small fee if it protected the Scheme. This proposal was seen by many as the least impactful of the options presented in the consultation.

'I discussed this with members of local Women's Group and we all agreed that charging a nominal fee was more acceptable than losing Smart pass card from those age 60 to 65. No more

than £10. People pay this for a blue badge.’ (Lisnaskea Women’s Group)

‘I don’t think this fee should be introduced to the cost-vulnerable elderly population or those who are in possession of a SmartPass by reason of disability. However, if one measure from this consultation was essential to introduce for the protection of the scheme, I would opt for this one.’ (Individual response)

Alternative options to reduce administrative costs

6.100

Some respondents commented that the equalisation of concessions between older people and disabled people would reduce the administration costs associated with transitioning between different types of passes. Others called for a review of the administration, whilst others commented that the current application and renewal process was difficult and should be revised.

‘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 renewals more straightforward going forward.’ (IMTAC)

‘Opportunities may exist for the department to make savings on the administration of the scheme by them co-ordinating the application, renewal and replacement rather than commissioning Translink to complete.’ (Derry City and Strabane District Council)

Option 5 – Free travel for those currently receiving a half fare concession due to a qualifying disability (Questions 15 & 16)

6.101

In Northern Ireland, a half fare concession is available for people who:

- get the mobility component of Personal Independence Payment (PIP).
- have a recognised learning disability.
- are partially sighted (sight impaired).
- have had a driving licence refused or revoked on medical grounds.

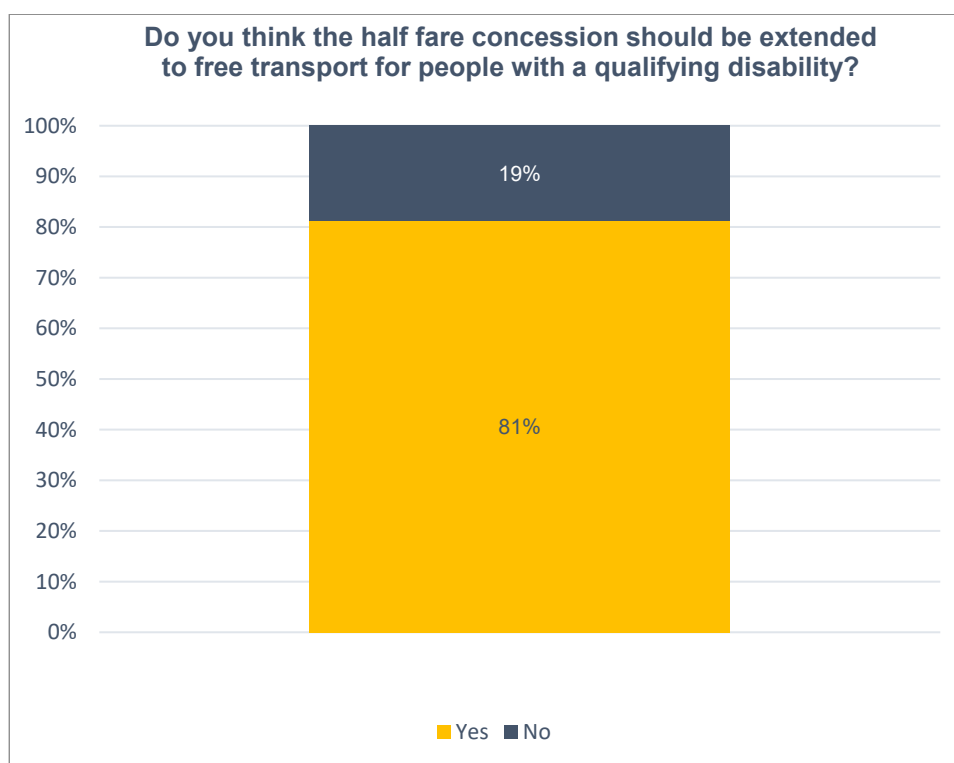
6.102

At Question 15, the Consultation paper sought views on whether the half fare concession should be extended to free transport for people with a qualifying disability.

Quantitative Analysis

6.103 Of the respondents who answered Question 15 (n=6858), the majority (81%) agreed that the half fare concession should be extended to free transport for people with a qualifying disability, while 19% think that it should not.

6.104 The graph below shows a visual breakdown all responses.



Qualitative Analysis

6.105 At Question 16, the consultation gave respondents the opportunity to provide comments supporting their answers. Respondents commonly raised the following points in their responses.

This is the right thing to do which will promote social inclusion and improve quality of life

6.106 A commonly voiced opinion amongst respondents supporting the proposal was that people with a qualifying disability deserve all the support they can get and that giving free travel was the 'right thing to do' in a caring and compassionate society.

'People with disabilities with low income and other factors such as loneliness, living in remote places need access to affordable public transportation. They need to know that we care about them and we will provide for and support them. Providing a concession or free fare is the least we can do.' (Individual response)

- 6.107 Respondents recognised that this group may be more reliant on public transport than others and therefore are in need of concessionary travel, with some expressing surprise that the concession was currently capped at half fare having assumed that free transport was already available to those with a qualifying disability.

‘Disabled persons often have more need of public transport than others. It is unfair that they should be asked to pay 50% of the cost.’ (Individual response)

- 6.108 Many respondents commented that this measure is vital to support social inclusion, reduce isolation and to generally improve mobility, health, access to opportunities (such as employment, education and training) and quality of life for those people with a qualifying disability.

‘This is an important and very welcome move towards equality for disabled people, for the reasons clearly set out in the consultation document. As noted in responses to previous questions, disability is complex and multi-faceted, and many disabled people who do not have obvious mobility limitations face significant challenges to independent mobility, including driving as well as using public transport unassisted. Expanding free travel to this group, in particular in conjunction with free travel for companions for those eligible, would significantly improve their opportunities to engage in society, which brings major benefits to health and wellbeing for individuals, and contributes to a fully diverse and equal society.’ (Woman’s Platform)

- 6.109 Respondents also commented that expanding free travel to all those with a disability could address inequalities within the current Scheme, particularly between pass holders who are partially sighted and those who hold a Blind SmartPass.

‘...Partially sighted passengers face very many of the same challenges as blind passengers yet are only entitled to a half fare concession. We believe that this inequality needs to be addressed as a priority. Partially sighted individuals cannot hold a driving license and are therefore unable to drive. This means that those registered partially sighted are at a distinct disadvantage when it comes to independence and restrictions on freedom to travel.’ (RNIB)

- 6.110 It was recognised by some that this could have a positive knock-on effect on the NHS and other services and deliver wider benefits to society.

‘It is a reflection on a society, how they look after the disadvantaged in their society. Free transport to those people should be given. As a result of this initial cost, further benefits and savings will be made. These will no doubt include health

benefits to the individual by reducing loneliness and isolation, in turn reduce the amount of medication required for depression. Reduced costs and time for the NHS. People will also be able to get to work and contribute to our society on a daily basis and by maintaining their independence, everyone benefits. Consider such long term benefits which are financial also for society.'
(Individual response)

Can help reduce financial pressures experienced by those with disabilities

- 6.111 Respondents highlighted that people with disabilities face greater financial challenges than those without, due to higher costs of living because of their disability and/or having lower levels of income. It was particularly noted that people with disabilities may be more reliant on public transport than other groups in society which increases their costs. Some respondents also highlighted that transport was a particular issue for disabled children and their families/carers.

'Given how expensive it is to live at the moment even if you're able to work full time, and don't need help and assistance with access and accommodations, the cost of living for people with disabilities and access needs is overwhelming and this would help relieve at least one pressure on those with limited income.'
(Individual response)

Would bring Northern Ireland in line with other concessionary travel schemes

- 6.112 Many respondents expressed concern that Northern Ireland was the only region in the UK not to offer free transport to people with a disability and were of the opinion that that Northern Ireland should be brought into line with other UK schemes and with the Republic of Ireland scheme.

"Northern Ireland is the only region in the UK where disabled people do not have access to free public transport. NUS-USI supports the proposal to extend concessionary fares to those with qualifying disabilities, we believe that it is unfair that Northern Ireland is the only region in the UK and Ireland that does not provide this. Furthermore, we believe that doing so would decrease the likelihood of social exclusion and promote access to education, employment, social activities and training."
(NUS-USI)

Reduction in car journeys

- 6.113 Respondents highlighted that offering free travel would encourage more people to use public transport rather than a car which would help reduce emissions and help the environment.

'I believe that everyone with a disability should have access to free transport. Free public transport for all is one of the ways we can meet our climate change targets.' (Individual response)

Pitting marginalised groups against each other

- 6.114 Many respondents also expressed concern that having proposals in the consultation which would reduce the scope of the Scheme for some and extend it for others could be potentially divisive. In some cases, respondents commented that they felt that they were being asked to make a choice between two vulnerable groups.

'The implication of the document's subsequent proposals (broadly, to cut the 60+ SmartPass and increase supports to disabled passengers) is that this is a choice or competition between two demographics – people aged 60 plus versus people with a disability.' (COPNI)

'We are concerned that the framing of this consultation has the unintended effect of pitting marginalised groups against one another.' (Unison)

People with disabilities already receive sufficient support

- 6.115 A common theme amongst unsupportive responses was that people with a qualifying disability are likely to already be in receipt of mobility benefit payments to assist with the cost of travel and may have a car provided under the Motability Scheme. These respondents were of the opinion that this support should address their transport needs and therefore the current half fare concession was reasonable.

'While supportive of increasing mobility for people with disabilities, some already receive additional payments as noted above, i.e., mobility component of PIP, so they would therefore be being assisted twice.' (Individual response)

Need to reduce overall Scheme costs

- 6.116 It was noted by some respondents that the main theme of the consultation was the need to reduce the cost of the Scheme and this proposal seemed at odds with that aim. These respondents believed that it would cost too much to implement this change and expressed concern that increasing costs by extending the concession could negatively impact on the Scheme as a whole.

'The aim of this consultation is to reduce the cost of the scheme. This will be a double blow to those who will lose their concessionary travel whilst others will have it extended to free travel in addition to receipt of their disability benefits.' (Individual response)

Other

- 6.117 Other themes identified from responses included the opinion that the system could be open to abuse and would need strict monitoring and control; and that any concessions should be assessed on a case-by-case basis, depending on the nature of the disability.
- 6.118 Respondents sometimes commented that the Half-Fare SmartPass did not represent value for money as, in many instances, it was cheaper for half-fare users to purchase return tickets or special offer fares than use their SmartPass.

‘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’ (IMTAC).

- 6.119 Changing the Half-Fare SmartPass to allow for the purchase of return or special offer fares was raised by some respondents. It was also suggested that allowing SmartPass holders to purchase return fares instead of single journeys could reduce congestion at ticket offices and lessen the stress of travel for older people and people with disabilities who use the Scheme.

‘...Modifying the scheme to enable the use of day-tickets and return tickets could potentially make meaningful savings. It also has the benefit of removing the added burden of having to purchase tickets for both legs of the journey as opposed to only once. If the return ticket option was available to older people and other groups, including those living with a disability, it would avoid the stress and congestion of additional queuing at ticket offices, and an additional pressure associated with each journey.’ (AGE NI)

- 6.120 Respondents also highlighted disparities between concessions in the Scheme and alternative transport options for people with disabilities such as Dial-a-Lift or the Disability Action Transport Scheme.

‘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.’ (IMTAC)

Option 6 – Companion passes for disabled people unable to travel alone (Questions 17 & 18)

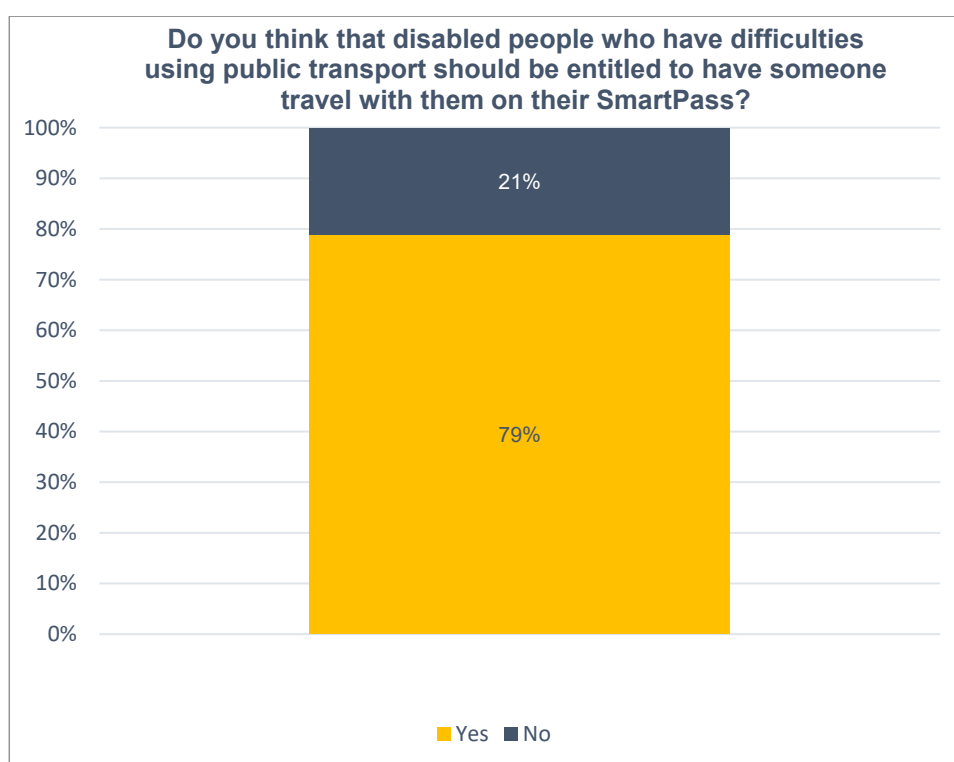
6.121 Currently, people with qualifying disabilities receive concessionary travel, however, those travelling with the person must still pay a fare, even if the disabled person cannot travel on their own for a reason related to their disability.

6.122 At Question 17, the Consultation paper sought views on whether disabled people who have difficulties using public transport should be entitled to have someone travel with them on their SmartPass.

Quantitative Analysis

6.123 Of the respondents who answered Question 17 (n=6789), the majority (79%) think that disabled people who have difficulties using public transport should be entitled to have someone travel with them on their SmartPass, while 21% think they should not.

6.124 The graph below shows a visual breakdown of all responses.



Qualitative Analysis

6.125 At Question 18, the consultation gave respondents the opportunity to provide comments supporting their answers. Respondents commonly raised the following points in their responses.

This is a necessary measure which will promote social inclusion and improve quality of life

- 6.126 A key theme across supportive responses was recognition that some people with disabilities face additional barriers and challenges when using public transport due to the type or severity of their disability. For these respondents, companion travel is a necessary and sensible measure that would address the accessibility needs of this cohort. Without a companion, many people would be unable to travel meaning they would get no benefit from the Scheme.

‘The more disabled within society who require help should have that concession added to their pass otherwise the objective of removing/reducing social isolation cannot be met. It is pointless providing a pass to someone who is barred from using it due to their personal circumstances.’ (Individual response)

- 6.127 Under this theme, the introduction of a companion pass was viewed as a positive step which would make public transport more accessible, providing greater freedom and enabling travel for those unable, or who struggle, to travel independently. A companion can assist the person travelling, provide reassurance, and improve safety, all of which can encourage greater use of public transport, maximise independence, and enable greater social interaction. This in turn will help reduce social isolation, increase access to opportunities, and improve quality of life.

‘For many people living with a vision impairment one of the biggest inhibitors to getting out and about is confidence. For many, coming to terms with changes in their sight or for others learning to use public transport for the first time can be daunting. For others, repeated negative experiences discourage them from travelling independently. As our community-based volunteer led service demonstrates - having someone with you is a huge motivator to getting out and about, being an active member of society and immediate community as well as enhancing self-esteem and quality of life. When travelling alone many in the VI community often feel vulnerable and have shared their apprehension about solo journeys and personal safety. They stress the reassurance they feel with a companion or sighted guide is invaluable. Providing a companion pass will encourage more people, particularly those from economically disadvantaged backgrounds to more fully participate in society.’ (Guide Dogs NI)

Can help reduce financial pressures experienced by carers

- 6.128 Many respondents expressed the view that carers are often unpaid or low paid and should not have to bear the additional financial burden of travel associated with their caring responsibilities. Comments referenced the valuable contribution carers make to society, reducing the burden on the NHS and, in turn, saving the government money.

‘There are 125,000 Unpaid carers in Northern Ireland, saving the government £4.6bn on care costs (Economic and Social Research Council review 24 November 2022). They are often unable to sustain high quality/well paid employment due to their caring responsibilities and if they are supporting a vulnerable person to access services and support it is therefore unreasonable to burden them with further costs.’ (Individual response)

‘Often people with a disability require assistance whilst travelling. For people with epilepsy, this supports emergency care in the event of a seizure, avoids hospital admissions and personal injury. It is our view that companion passes should be introduced in Northern Ireland to increase social inclusion.’ (Epilepsy Action NI)

- 6.129 Responses also highlighted the particular needs of children with a disability who often require a parent/carer to travel with them, creating an additional financial burden on these families.

‘The access needs of children with disabilities should be carefully considered, and many will need accompanied by a parent/carer when using public transport.’ (Children in Northern Ireland (CiNI))

This would open the Scheme to abuse and would be difficult to administer

- 6.130 A commonly voiced opinion from those who did not support the introduction of companion travel was that this proposal could be open to abuse and would be difficult to administer. Some cautioned that if it were to be introduced it would require strict eligibility criteria and controls.

‘Unfortunately, I feel that this is likely to be abused by a small minority in the same way disability car parking passes are.’ (Individual response)

People with disabilities already receive sufficient support

- 6.131 Some respondents highlighted that people with a qualifying disability were likely to be in receipt of mobility benefits or Carers’ Allowance. These respondents were of the opinion that this support should cover the cost of companion travel and there was therefore no need to introduce companion passes.

‘If a person needs someone to travel with them they can pay for their companions fare from their attendance allowance/ mobility element of their benefit.’ (Individual response)

Need to reduce overall Scheme costs

- 6.132 Another theme across unsupportive responses was concern that it would cost too much to implement this change, particularly at a time when the Department was trying to reduce the cost of the Scheme. Many respondents were concerned that increasing costs by extending the concession would negatively impact on the Scheme as a whole.

“No business reason to justify this additional cost in a time of tight fiscal finance, particularly if it affects the SmartPass holders who more than deserve this card.” (Individual response)

Suggestions for Implementation

- 6.133 Respondents were asked for opinions on how this proposal could work in Northern Ireland. Many expressed the view that this concession should not be automatic for people with a disability but should be assessed on a case-by-case basis to determine need as not everyone would require a companion. Northern Ireland could use the experience of other schemes in Scotland, Wales and the Republic of Ireland, all of which provide for companion passes subject to certain criteria, as the basis for implementing this measure and determining the eligibility criteria.
- 6.134 In terms of control measures to administer the pass and prevent abuse, respondents suggested allowing only a named or registered companion; having a pass that can only be used when accompanying the main SmartPass holder; and not issuing standalone companion passes, rather linking the concession to the main SmartPass (this would be the Department’s intention).
- 6.135 A number of respondents, across both supportive and unsupportive responses, also suggested that companions should be able to avail of a reduced or half fare rather than a full fare concession.

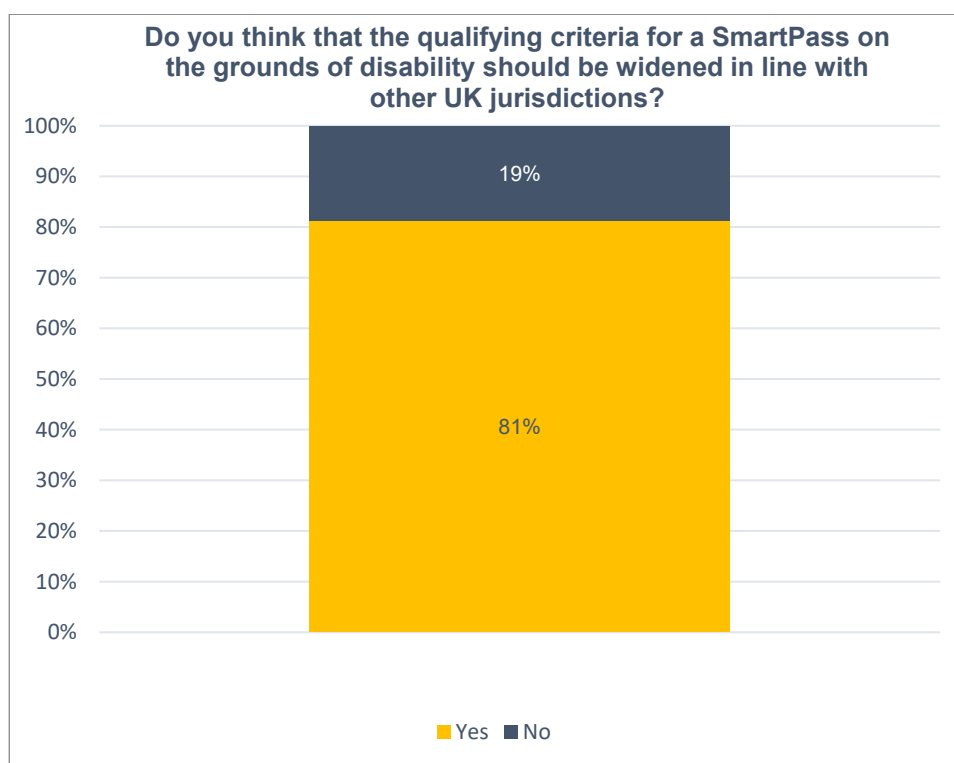
Option 7 – Extending the qualifying criteria for a Half-Fare SmartPass in line with other jurisdictions (Questions 19 & 20)

- 6.136 Currently, Half-Fare SmartPasses are issued to disabled people who qualify under the Scheme. To qualify for a Half-Fare SmartPass the person must:
- be in receipt of mobility component of Personal Independence Payment (PIP).
 - have a recognised learning disability.
 - be partially sighted (sight impaired).
 - have had a driving licence refused or revoked on medical grounds.
- 6.137 At Question 19, the Consultation paper sought views on whether the qualifying criteria for a SmartPass on the grounds of disability should be widened in line with other UK jurisdictions.

Quantitative Analysis

6.138 Of the respondents who answered Question 19 (n=6599), the majority of respondents (81%) think that the qualifying criteria for a SmartPass on the grounds of disability should be widened in line with other UK jurisdictions, while 19% think that it should not.

6.139 The graph below shows a visual breakdown of all responses.



Qualitative Analysis

6.140 At Question 20, the consultation gave respondents the opportunity to provide comments supporting their answers. Respondents commonly raised the following points in their responses:

This is the right thing to do which will support social inclusion and improve quality of life

6.141 Many respondents who were supportive of this proposal recognised that those with a disability are at risk of social exclusion and therefore can benefit from increased access to public transport. They highlighted that disabilities are wide ranging and often hidden, and focussing the eligibility criteria on mobility restrictions can exclude those who are also in need.

‘Disabled people face other barriers to transport than clear and direct mobility limitation, and therefore the mobility component of PIP is not a sufficient eligibility criterion. This would exclude in particular people with learning disabilities and autism, who

should be eligible as far as possible since they in a majority of cases have very limited options to public transport.’ (Women’s Platform)

- 6.142 These respondents felt that people with a disability deserve all the support they can get, regardless of the nature of the disability, and the Scheme should not discriminate between different types of disability.

‘I don’t think there should be any exclusions on the grounds of disability. If you have a disability you should qualify.’ (Individual response)

- 6.143 Increased access to public transport would enable more people with disabilities to access work, volunteering, education and training opportunities, and social activities. In turn this can promote social inclusion, reduce isolation and generally improve their quality of life, while having wider benefits for the health service and economy and helping build a more inclusive society.

‘The widening of the qualifying criteria has the potential of increasing inclusiveness.’ (Individual response)

Would bring Northern Ireland in line with other concessionary travel schemes

- 6.144 Many respondents were of the opinion that the criteria should be in line with the schemes in England, Scotland and Wales so that all UK residents have equal access to support. For these respondents, this proposal to widen the eligibility criteria was viewed as fair and sensible and would help more of those in need access the benefits of the Scheme.

‘It is only fair that residents in Northern Ireland should receive the same assistance as those in other areas of the UK.’ (Individual response)

- 6.145 However, conversely, some who opposed extending the eligibility criteria were of the view that Northern Ireland is a separate jurisdiction with its own unique circumstances and should therefore set its own criteria for the Scheme rather than copying other jurisdictions.

‘I think SmartPass for people with disabilities is reasonable at this moment in time. We are not the same as the rest of the UK in a lot of situations, it’s reasonable for NI not to be the same in this respect also.’ (Individual response)

People with disabilities already receive sufficient support

- 6.146 A key theme from unsupportive responses was that the current qualifying criteria is fair and people with a disability do not need further concessions as they already receive support for travel in the form of personal independence payments (PIP), have a car provided

under the Motability scheme or have access to a blue badge for parking.

'I see no reason to make this change. Someone on PIP mobility is surely well supported re transport.' (Individual response)

Need to reduce overall Scheme costs

- 6.147 Many respondents opposed to the proposal were concerned that implementing this change would cost too much, particularly at a time when the Department was trying to reduce costs. Concern was also expressed that increasing costs by extending the concession would negatively impact on the Scheme as a whole.

'I feel this will cost too much and it could be to the detriment of people aged 60-64.' (Individual response)

Suggestions for Implementation

- 6.148 Respondents were asked for opinions on how this proposal could work in Northern Ireland. A common theme across supportive and unsupportive responses was that the eligibility criteria needed to ensure the system could not be abused and this would need to be carefully managed and monitored.
- 6.149 Some respondents were of the opinion that all those with disabilities, including hidden disabilities, should qualify for a SmartPass, while more believed that it should depend on the nature of the disability and be assessed on a case-by-case basis, and in some cases limited to those with mobility issues only or those unable to drive.
- 6.150 Organisations sometimes commented that collaboration across Departments could make the administration process easier, and potentially allow for automatic distribution of SmartPasses for users with a disability. This included information sharing relating to PIP awards, Blue Badge applications or notifications to DVA.
- 6.151 Finally, some highlighted that the current criteria act as a barrier for those who cannot drive who, in order to access the Scheme, must apply for a driving license and be refused before they can apply for a SmartPass. Respondents called for this criterion to be amended to reflect other jurisdictions where people who *would* be refused a driving license can apply for the Scheme.

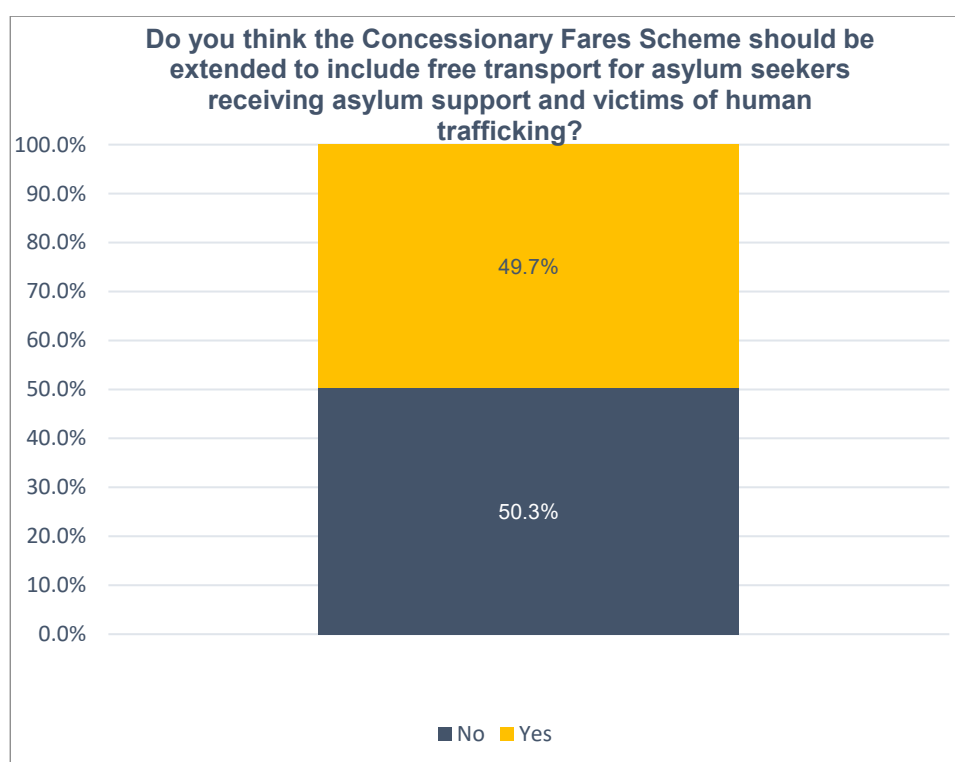
'A further option that we believe should be considered is changes to the eligibility criteria for disabled people. People with epilepsy who cannot drive have told us that they must first apply for a driving licence and provide evidence of refusal to apply for the concession. This is an ongoing issue which continues to leave people with epilepsy unable to drive and excluded from the SmartPass scheme.' (Epilepsy Action NI)

Option 8 – Free transport for destitute asylum seekers and victims of human trafficking (Questions 21 & 22)

- 6.152 Under the current Scheme, asylum seekers are only entitled to a SmartPass if they fall within one of the existing concessionary fares categories e.g., if they are over 60 or have a qualifying disability.
- 6.153 At Question 21, the Consultation paper sought views on whether the Concessionary Fares Scheme should be extended to include free transport for asylum seekers receiving asylum support and victims of human trafficking.

Quantitative Analysis

- 6.154 Of the respondents who answered Question 21 (n=6647), 49.7% think that the Concessionary Fares Scheme should be extended to include free transport for asylum seekers receiving asylum support and victims of human trafficking, while 50.3% think that it should not.⁶
- 6.155 The graph below shows a visual breakdown of all responses.



Qualitative Analysis

⁶ The percentages in this instance have not been rounded to the nearest whole number to show the difference in opinion of respondents saying yes and respondents saying no.

- 6.156 At Question 22, the consultation gave respondents the opportunity to provide comments supporting their answers. Respondents commonly raised the following points in their responses.

The Right Thing to Do which will promote social inclusion and integration

- 6.157 One of the key themes emerging from responses supportive of the proposal was that asylum seekers and victims of human trafficking are one of the most vulnerable and socially excluded groups in our society and deserve all the support they can get. Many respondents acknowledged the difficult and traumatic events and atrocities this group will have experienced, and the provision of free travel was seen as the 'right thing to do' in a caring and compassionate society.

'I believe that people in such positions are more often than not, already on the bottom rung of society & should qualify for any financial assistance going.' (Individual response)

'It seems only right to provide assistance to those that have escaped from life threatening and abusive circumstances. It is the just and right thing to assist those seeking to rebuild their lives.' (Individual response)

- 6.158 Under this theme, many respondents recognised the need to support asylum seekers to integrate into their local communities, which would help promote social inclusion, reduce isolation and improve quality of life. As access to transport is a key barrier to integration, the extension of the Concessionary Fares Scheme to asylum seekers and victims of human trafficking was seen as a necessary measure to enable these groups participate in society and integrate into their new communities.

'These are some of the most vulnerable people in our society, at an extremely difficult time of their lives. They should be provided with free travel. It can help them to access services, and in doing so they may integrate faster into our society.' (Individual response)

'Asylum seekers receiving asylum support and victims of human trafficking are at risk to become isolated. They need to be able to move freely and socialise, but they do not have economical means to do that. They need to be supported, in any way possible. Free transport is a good way to help them to fully integrate in the society around them.' (Individual response)

- 6.159 Responses from organisations supporting asylum seekers and refugees also highlighted that the provision of free travel to asylum seekers would support the Northern Ireland Executive's draft Refugee Integration Strategy, the vision of which is: *A cohesive and shared society where refugees and asylum seekers are valued and feel safe,*

are integrated into communities, and are supported to reach their full potential.

Would increase access to essential services

6.160

A commonly-voiced opinion was that free public transport would enable this group to access the support and services they need. Health services were frequently cited, particularly the need to attend GP and hospital appointments and access mental health support. Under the NHS Travel Scheme, asylum seekers can reclaim the cost of travel to certain health appointments, however, some organisation responses highlighted that this process can be difficult to navigate and requires the individual to have the money to pay the fare in the first instance.

‘Among the essential travel costs is the cost of travel to attend medical and counselling appointments where this is not covered by the NHS travel scheme. Mostly it is not covered. This is of particular importance to asylum seekers who have often endured trauma – physical and mental - in their country of origin, their journey to the UK and after arrival.’ (Larne House Visitor Group)

6.161

Respondents noted the need for asylum seekers to attend Home Office appointments and access legal support which, along with other specialist services, are centralised in Belfast and require those living outside Belfast, in particular, to have access to transport. Appropriate social, cultural and religious services are scarce and those available can also be some distance from where asylum seekers are accommodated. Dispersal of asylum seekers was viewed by some as exacerbating this problem.

‘Choosing which trips take priority – whether that’s to a GP surgery, seeing a client adviser or speaking with a solicitor – becomes a difficult task...This challenge has been compounded by a widening dispersal area, making distances between accommodation and services even greater.’ (Migrant Help)

6.162

A number of respondents also highlighted the importance of free travel for education purposes, particularly to access English for Speakers of Other Languages (ESOL) classes and other training opportunities. Free travel would also allow parents to accompany children to school, which may be some distance from their accommodation, and may enable children to remain at a school they have settled into it if, for example, they were to be moved to new accommodation.

Public transport is otherwise unaffordable

6.163

Many respondents supportive of the proposal commented that this group of people had limited income and would not be able to afford public transport without assistance, and, as a result, they often face

difficult decisions, for example, whether to pay to travel to a medical appointment or pay for food. Having access to free transport would help alleviate some of these financial challenges, ensuring that they have a means to access all the services necessary to keep them, and their families, safe and healthy.

‘Having worked with people seeking asylum, transport is one of the most recurrent issues that is brought up. For people to attend medical appointments, access education and to bring their children to school, the cost is way too high and means that often people have to walk unreasonable distances or not attend...if anyone pays for even two days of travel a week that is nearly their entire finances used which is unreasonable and infeasible. This is isolating people; it is having an impact on people’s mental health and it’s putting people at risk.’ (Individual response)

- 6.164 Some organisations commented that while support payments from Home Office received by asylum seekers include a transport element, the calculation of this element is based on asylum seekers living in the Greater Belfast area and does not account for the higher costs of public transport fares outside of Belfast or for those who are required to travel from other parts of Northern Ireland to Belfast for mandatory or essential appointments. These organisations were strongly opposed to any reduction in support payments should the Scheme be extended to include asylum seekers and victims of human trafficking.

‘The introduction of free transport should not impact negatively on people within these categories, any asylum or NRM financial support received should not be reduced because of the free transport support provided.’ (Migrant Help)

This would be unfair to those who have paid taxes

- 6.165 A common theme amongst those opposed to this proposal was that it would be unfair to extend the Scheme to those who have not worked in Northern Ireland and therefore not contributed to the economy. Some were aggrieved that the Department is considering such a proposal at the same time it is also considering reducing eligibility for other groups. Many of these respondents were of the view that asylum seekers receive sufficient support, and the Scheme should be reserved for those who have made a contribution.

‘Absolutely not! We have all paid our taxes since working age and if the SmartPass is being taken away from the citizens who have paid for it for 40 years then it should NOT be given to non-nationals regardless of their circumstances. This is a ridiculous proposal and I strongly oppose it. These people get enough already that us taxpayers are having to pay for.’ (Individual response)

- 6.166 Some organisations were alive to this viewpoint and expressed concern that the inclusion of this proposal alongside proposals to restrict travel for others could be potentially harmful for members of this vulnerable group.

‘One concern we do have is the incorrect yet possible connection people might make between the raising of the SmartPass age eligibility and the introduction of free transport for asylum-seekers and victims of human trafficking. We are worried that people engaging with this consultation may use asylum-seekers and victims of human-trafficking as a scapegoat for the possible changes to the age requirement for SmartPasses. This is incredibly harmful to a vulnerable group of people who already face social exclusion. We urge the Department to clarify that these changes to policy are not ‘one or the other’ to dispel these harmful connections.’ (NIWBG)

Need to reduce overall Scheme costs

- 6.167 While some respondents were of the opinion that extending the Scheme to asylum seekers and victims of human trafficking would not significantly increase the overall costs of the Scheme due to the small numbers of asylum seekers in Northern Ireland, others cited increasing costs as the reason for not supporting the proposal. These respondents do not believe it is feasible to increase the numbers eligible to access the Scheme at a time when the Department is trying to reduce its cost.

*‘Introducing further concessions at this stage is unaffordable.’
(Individual response)*

Could open the Scheme to abuse

- 6.168 Another commonly-voiced concern from respondents opposed to the proposal was that it would be difficult to properly administer and monitor which would leave the Scheme open to abuse. A small number of respondents also expressed concern that offering free transport could increase the number of illegal immigrants coming to Northern Ireland.

*‘This would be too difficult to monitor. Also, it would be another advantage and appealing for people who are claiming to be asylum seekers but may in reality be economic migrants.’
(Individual response)*

Suggestions for Implementation

- 6.169 Respondents were asked for opinions on how this proposal could work in Northern Ireland.

- 6.170 A key theme across supportive and unsupportive responses was that any provision of free transport should be limited. In the consultation document the Department suggested six months as a time-limit for

SmartPasses for asylum seekers in line with Home Office decision processing targets. While many respondents agreed with this period, other respondents suggested a one-year period due to the delay in Home Office processing times. Some of these respondents also commented a one-year period would reduce the frequency of renewals and therefore administration costs.

- 6.171 Other respondents proposed setting a limit on the extent of travel, with some suggesting it should be for prescribed activities or essential journeys only e.g., *'attendance at meetings in relation to seeking asylum, medical appointments, accompanying young children to essential appointments or school'* (Individual response), limited to local areas or restricted to bus travel only.
- 6.172 Other proposals included suggestions that a half fare concession should be given rather than free transport.
- 6.173 In terms of proving eligibility, respondents highlighted the need for requirements to be as simple as possible and accessible for non-English speakers. Any documents requested should be those routinely available, with suggestions including evidence that the individual has applied for asylum (e.g. a letter from an accommodation provider, a solicitor or migrant support organisation), or a copy of a Bail 201 form.
- 6.174 Some respondents suggested that asylum seekers should be able to present a physical SmartPass when travelling, ensuring that no other official documentation would need to be accessed and/or carried with the recipient when travelling.
- 6.175 Organisations suggested amending the name of the proposal to include 'Victims of Human Trafficking and *Modern Slavery*' and ensuring that victims of human trafficking and modern slavery have access to free travel as soon as they are referred into the National Referral Mechanism. It was also highlighted that unlike the asylum system, human trafficking and modern slavery are devolved matters in Northern Ireland, and therefore, the Department would be required to engage with the Department of Justice if this proposal was to be implemented.
- 6.176 A number of respondents expressed the view that any provision of free transport for asylum seekers and victims of human trafficking should be funded and administered under a different scheme, while others suggested asylum seekers should be allowed to work which would enable them to afford public transport.

Option 9 – Changes to the residence test (Questions 23 & 24)

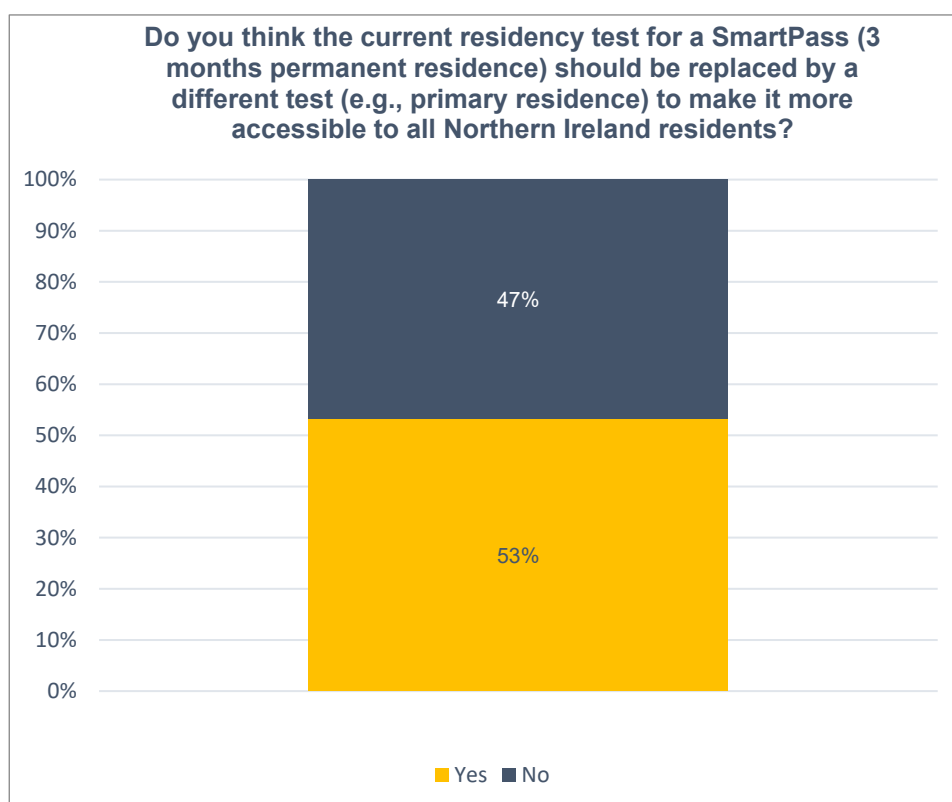
- 6.177 In Northern Ireland, there are a number of different SmartPasses that people can apply for. To apply for one of these passes, a person must

prove they have been *permanently resident* in Northern Ireland for a *period of 3 months*.

- 6.178 At Question 23, the Consultation paper sought views on whether the current residency test for a SmartPass (3 months permanent residence) should be replaced by a different test (e.g., primary residence) to make it more accessible to all Northern Ireland residents.

Quantitative Analysis

- 6.179 Of the respondents who answered Question 23 (n=6696), just over half of all respondents (53%) think that the current residency test for a SmartPass should be replaced by a different test to make it more accessible to all Northern Ireland residents, while 47% think that it should not.
- 6.180 The graph below shows a visual breakdown of all responses.



Qualitative Analysis

- 6.181 At Question 24, the consultation gave respondents the opportunity to provide comments supporting their answers. Respondents commonly raised the following points in their responses.

Unfair to have to wait three months

- 6.182 A common view expressed by those supportive of changes to the residency test was that using primary residence as the test seemed reasonable and fairer than making people wait three months when

they were intending to stay permanently in Northern Ireland. Respondents recognised that people may be at risk of social exclusion from the time they arrive and therefore should have access to concessionary fares.

‘3 months is a long time to wait for support if you need it; especially if you have complex health needs, or you are a carer etc....’ (Wellbeing Clinic Belfast)

Would bring Northern Ireland in line with other concessionary travel schemes

- 6.183 Many respondents expressed the view that it would make sense for Northern Ireland to align with other neighbouring jurisdictions, with some respondents recommending alignment with the criteria used by the Republic of Ireland i.e., those “legally and permanently residing...”.

‘I suggest that the Republic of Ireland’s residence test should be considered: ‘Legally and permanently residing in the State on an all-year-round basis.’ Again, NI should talk to ROI counterparts and see how this works in practice and how successful it is.’ (Individual response)

Current criteria is reasonable

- 6.184 Many respondents who did not support a change to the residency test were of the view that the current test of three months permanent residency appeared reasonable and therefore there is no need to change the Scheme. This time period can help ensure that those who are applying for the Scheme intend to live in Northern Ireland permanently.

‘Three months is not a long time to wait for a concessionary pass. I had to wait longer than three months to receive my pass. The three month period also confirms that they are ‘committed’ to residing in NI. While sympathetic to the plight of those residing in NI for the first time it is important to protect the scheme from abuse and to protect lifelong NI residents who have financially contributed to Northern Ireland over the years’ (Individual response)

Time period should be extended

- 6.185 Whilst many felt that the current test was reasonable, many other respondents felt that that three months was not long enough to establish permanent residency and expressed the view that the time period should be extended. Many respondents also stated that people should have contributed to the system for a period of time before they would be eligible for a SmartPass. Suggestions for the length of time someone should be resident before being eligible for a SmartPass ranged from six months to over 20 years.

‘A person should have contributed to the country for a good period of time i.e. 5 years before they are entitled to a concessionary ticket or discounted ticket. People who have been born and bred in this country had to wait until they were 60 before being eligible. I think 3 months is too short a period of time.’ (Individual response)

Could open the Scheme to abuse

- 6.186 A theme across both supportive and unsupportive responses was concern that the proposal to allow applicants to sign a declaration stating that Northern Ireland is their primary residence was not sufficient proof and would leave the system open to abuse. Respondents highlighted that there would need to be sufficient checks in place to ensure there was no abuse of the system.

‘Relevant checks need to be made to ensure the system is not being abused and reviewed after a period of time to ensure circumstances haven’t changed.’ (Individual response)

Could have an adverse impact on the Scheme

- 6.187 Some respondents commented that it would cost too much to implement this change, particularly at a time when the Department was trying to reduce costs, and expressed concern that this could negatively impact on the Scheme as a whole.

‘No, I feel that adding any additional groups etc to the Scheme is further jeopardising the groups which are already vulnerable to having their pass removed.’ (Individual response)

Option 10 – Proving residency (Questions 25 & 26)

- 6.188 In Northern Ireland, when a person applies for a SmartPass, they must prove their residency by providing one of the following:

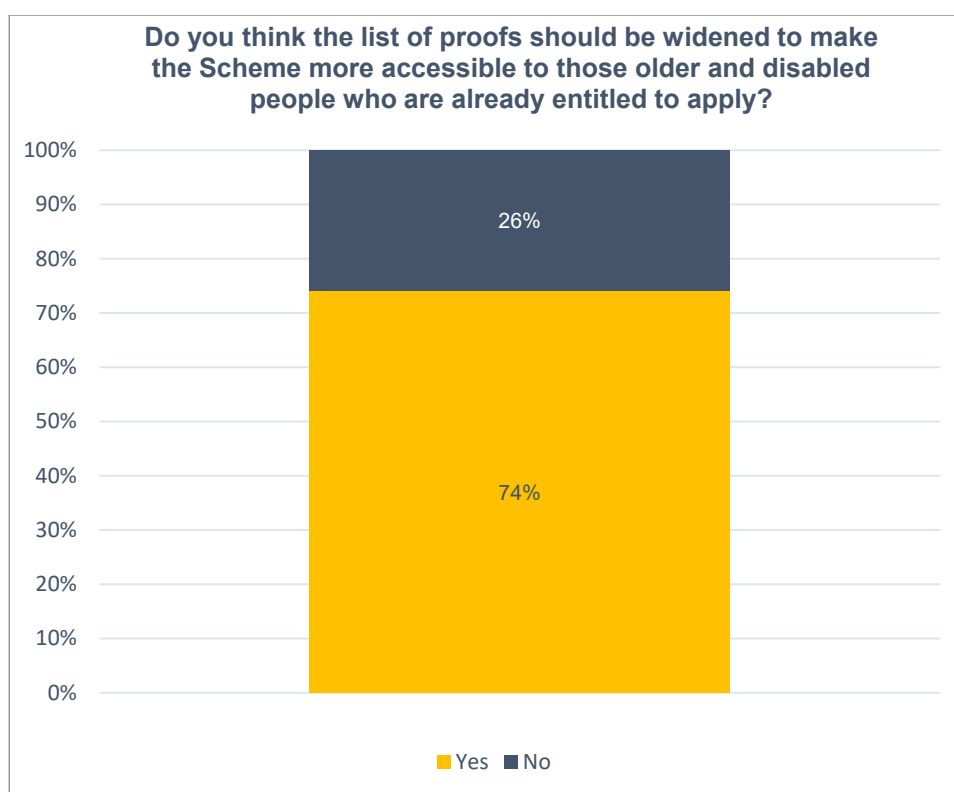
- driving licence.
- recent (no more than three months old) utility bill (an electricity, gas, or landline telephone bill, but not a mobile phone bill).
- recent (no more than three months old) bank or building society statement.
- Northern Ireland Electoral ID Card.

- 6.189 At Question 25, the Consultation paper sought views on whether the list of proofs should be widened to make the Scheme more accessible to those older and disabled people who are already entitled to apply.

Quantitative Analysis

- 6.190 Of the respondents who answered Question 25 (n=6440), the majority (74%) think that the list of proofs should be widened to make the Scheme more accessible to those older and disabled people who are already entitled to apply, while 26% think that they should not.

6.191 The graph below shows a visual breakdown of all responses.



Qualitative Analysis

6.192 At Question 26, the consultation gave respondents the opportunity to provide comments supporting their answers. Respondents commonly raised the following points in their responses.

Would make the Scheme more accessible

6.193 A commonly voiced opinion from those supportive of the proposal was that, in the interests of fairness and inclusion, the list of proofs should be wide enough to allow everyone who is eligible to access the Scheme. Respondents noted that widening the list of proofs would simplify the application process, remove any barriers and make the Scheme more accessible to all.

'I work in an organisation with socially isolated and often deprived adults. I think making the process more accessible would be incredibly helpful to them.' (CLARE CIC)

6.194 Many of those supporting the proposal expressed the view that the current list of proofs is too restrictive and many people may not have access to the documentation on the list for a variety of reasons. Examples highlighted included those who have never having a passport or driving licence and the increasing use of online banking and paperless billing for utilities.

'I was born and have lived here all my life, and even with that being the case, I have found myself on occasion struggling to prove who I am and where I reside, so have had to go to the trouble of getting a passport even though I don't travel abroad. So I have sympathy with how limiting the existing system might be for some without documentation, or the option for acquiring it.' (Individual response)

- 6.195 Some organisations highlighted that providing proof from the current list would be difficult for certain groups in society such as asylum seekers and victims of human trafficking and that when reviewing the list of proofs, care should be taken to ensure that these groups would be able to access the Scheme. For such groups, it was suggested that any documentation issued by the Home Office or another relevant official should be sufficient proof.

'It is essential that a range of documentation is admissible as evidence of eligibility for concessionary fares for asylum seekers and victims of modern slavery, whether there is a scheme for asylum seekers specifically or whether the entitlement is on the grounds of age or disability. This could include Home Office acknowledgement of an asylum claim or evidence of receipt of Asylum Seekers allowance.' (Larne House Visitor Group)

- 6.196 A number of respondents highlighted that the current list of proofs could also make it difficult for homeless people, or people with no fixed abode or permanent address to access the Scheme.

'As per the consultation document, alternative proofs should be acceptable by the Scheme. This includes letters from GPs, and we would suggest widening it to include letters from the Housing Executive or homeless charities, for example a pro forma letter designed to reflect the fact that a client is registered with them and/or on a housing waiting list, and so cannot supply a full permanent address at that time.' (NI Women's Policy Group)

- 6.197 Respondents sometimes drew comparisons with GP registrations where a person is eligible for free healthcare immediately on their arrival in the country and suggested that the term 'ordinarily resident' is adopted.

'The key point is that a person moving to Northern Ireland can be deemed to be 'ordinarily resident' immediately on their arrival; they do not need to wait for a specified period before they become eligible to receive free healthcare. The relevant application form refers to 'taking up' residency; applicants are required to show an 'identifiable and settled purpose' such as retirement, joining a family member, taking up employment, etc. We propose that the Department adopts a similar approach and requires applicants to demonstrate a reason for living in Northern Ireland for the foreseeable future.' (Law Centre NI)

- 6.198 Organisations highlighted that the current requirement for a counter signatory who has known the applicant for two years can act as an additional barrier for migrants who are otherwise eligible for the Scheme and called for this requirement to be reviewed.

'We recommend that the counter signatory requirement to have known the applicant for 'at least 2 years' is removed. Instead, the counter signatory should confirm that s/he has 'known the applicant personally'.' (Law Centre NI)

Would bring Northern Ireland in line with other concessionary travel schemes

- 6.199 Some respondents felt that Northern Ireland should use the same list of proofs as other jurisdictions in the UK so that all regions were the same.

'I don't see why Northern Ireland should be any different than what is accepted in other parts of the United Kingdom.'
(Individual response)

The current list is sufficient

- 6.200 Many of those unsupportive of the proposal were of the opinion that the current list of proofs is sufficient and does not need to be widened. Respondents noted that the same proofs were used to access other services and that residents should be able to provide at least one item from the current list.

'The list as described above is perfectly fine. Wide enough and anyone and everyone will have access to at least one without a fee being required to obtain.' *(Individual response)*

Could open the Scheme to abuse

- 6.201 A common concern expressed by respondents was that widening the list of proofs would potentially leave the Scheme open to abuse and could lead to an increase in fraudulent applications. This concern was expressed by respondents who were supportive of widening the list of proofs as well as those who were not supportive. Many respondents felt that any documentation should be subject to rigorous scrutiny and stringent checks to prevent fraud with others suggesting that only official documentation should be accepted.

'Whilst the list of proofs could be expanded, it must still be secure enough to prevent false applications.' *(Individual response)*

Could have an adverse impact on the Scheme

- 6.202 Some respondents commented that widening the list of proofs would complicate the application process and involve more administration, which would increase costs at a time when the Department is trying to reduce the overall costs of the Scheme. Some respondents also

commented that the Scheme should be reserved for permanent residents or taxpayers only, expressing concern that increased access may result in a reduction in benefit to those currently in receipt of a SmartPass.

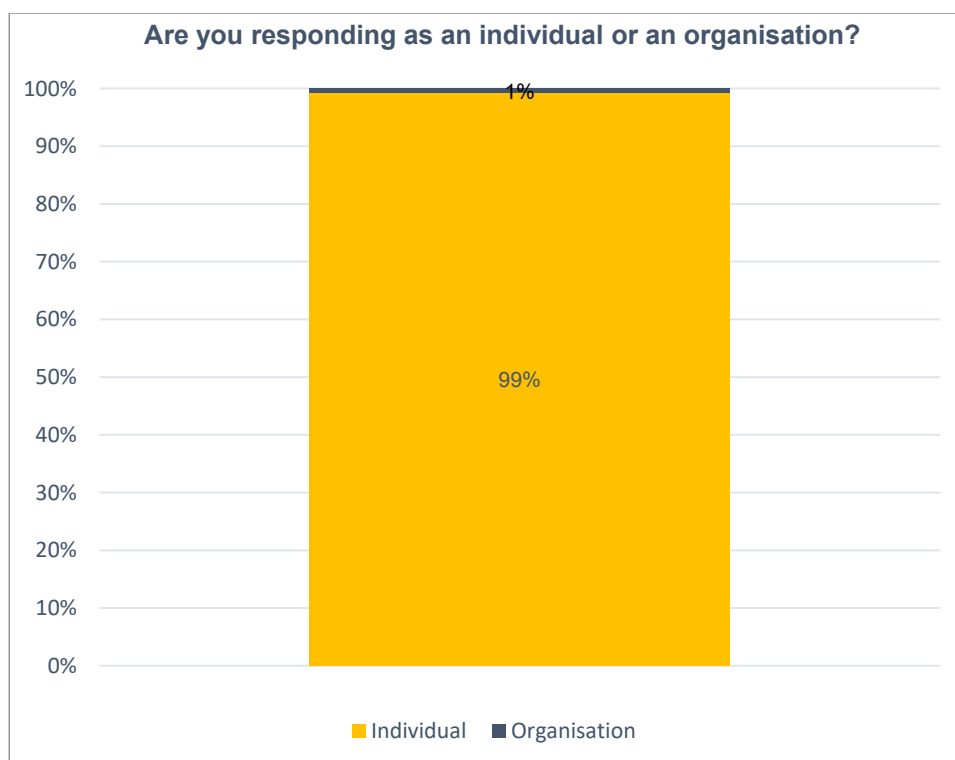
*‘Widening the list of proofs is likely to increase admin costs for the scheme when this review is aimed at cutting costs.’
(Individual response)*

7 Analysis of Questions 27-42

- 7.1 It was important for the Department to measure how successful the consultation process was in reaching the broadest possible range of individuals and groups across the diverse population of Northern Ireland. It was also important for the consultation team to identify how the views of current SmartPass holders (and those who would be directly affected by any future changes) varied from that of the general public.
- 7.2 Therefore, the final part of the consultation survey included a series of questions aimed at recognising a range of categories to ensure the consultation was as representative as possible.
- 7.3 Respondents of the survey were asked to confirm their name, postcode and email address for verification purposes and to allow for the identification of duplicate responses. Data was also collected on some protected characteristics. These monitoring questions were linked to the consultation questions and were asked to help understand the profile of respondents to the consultation.
- 7.4 It is important to note, however, that individuals were not obligated to respond to all of the questions posed in the 'About You' section and respondents could remain anonymous if they wished. Only three questions in this section were mandatory:
- Are you responding as an individual or an organisation?
 - Indication of publishing preference e.g., Publish response only without name.
 - Can the Department contact you again in relation to the consultation exercise?
- 7.5 The following section will highlight the demographic groups of Citizen Space responses to help identify how broad-ranging the consultation process has been.

About You

- 7.6 At Question 27, the consultation asked respondents to provide their name. A total of 6473 (87%) respondents answered this question.
- 7.7 At Question 28, the consultation asked respondents to confirm their email address. A total of 6236 (84%) respondents answered this question.
- 7.8 At Question 29, the consultation asked respondents to confirm if they were responding as an individual or an organisation. The vast majority of responses (n=7342) came from individuals with only 1% (n=57) of the total from organisations.
- 7.9 The graph below shows a visual breakdown of responses to this question.



7.10 At Question 30, the consultation asked respondents to confirm the name of their organisation (if they were responding in this capacity). There were 1473 answers to this question, however the majority were instances where individuals had marked 'N/A' or 'None'. Through data cleansing it was identified that 57 had responded in the capacity of an organisation.

7.11 At Question 31, the consultation asked respondents for their permission to publish their consultation response and requested that they indicate their publishing preference. 785 (11%) of respondents indicated that the Department could publish their response with their name; 4991 (67%) of respondents said that the Department could publish their response only without name; and 1623 (22%) of respondents said not to publish their response.

7.12 At Question 32, the consultation asked if the Department could contact respondents about their response in the future. 4570 (62%) said that the Department could contact them again while 2829 (38%) said the Department could not.

Information to help us analyse your response (individual responses only)

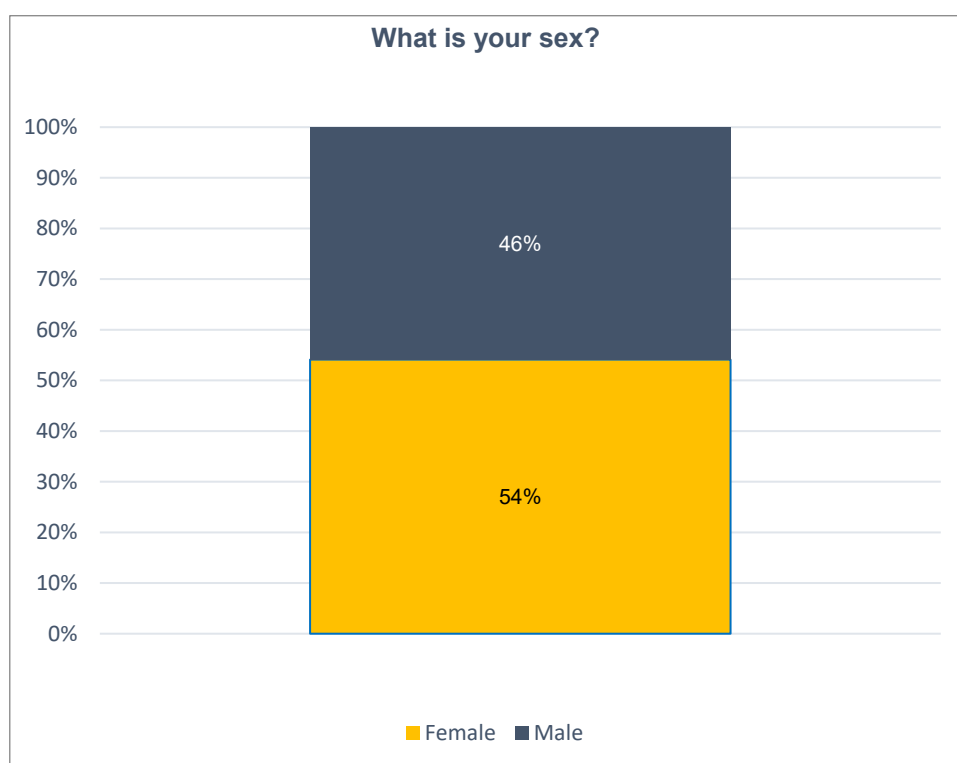
7.13 The next section of the survey asked individual respondents to answer questions that would help the Department analyse responses. These questions were included to help the Department understand

the profile of respondents and how people would be affected by any changes implemented.

7.14 At Question 33, the consultation asked respondents to confirm the first four digits of their postcode. A total of 5931 (80%) respondents answered this question.

7.15 At Question 34, the consultation asked respondents to confirm their sex. Of the respondents who answered Question 34 (n=6167), 54% were female and 46% were male.

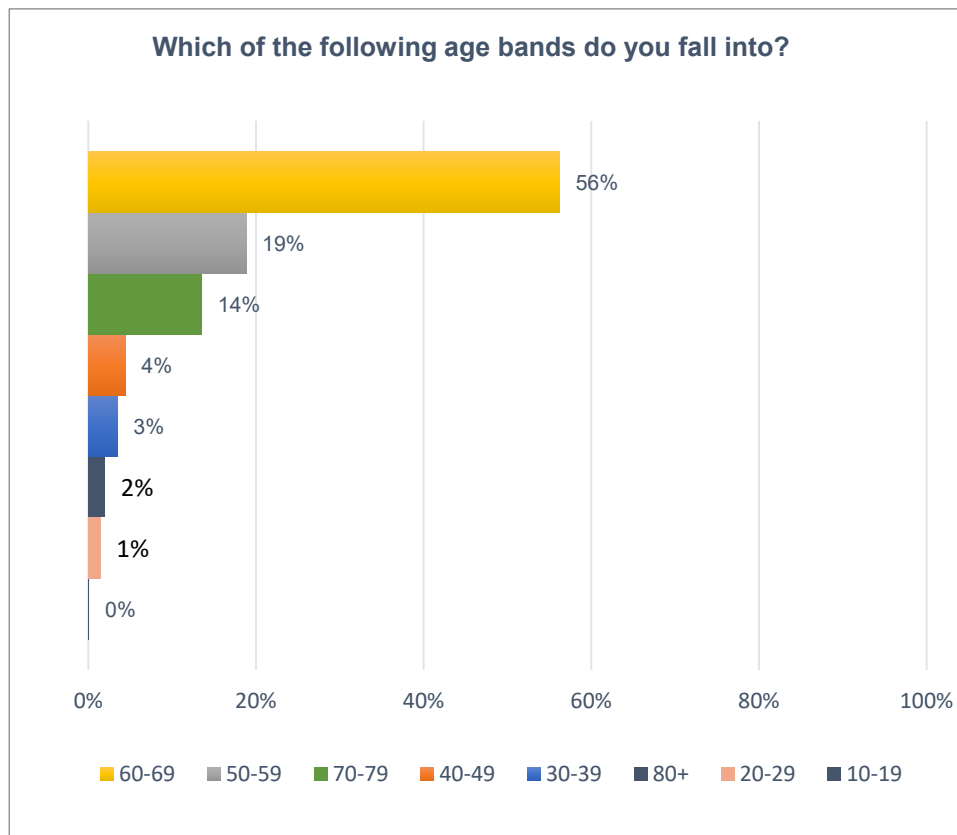
7.16 The graph below shows a visual breakdown of responses to this question.



7.17 At Question 35, respondents were asked to confirm which age band they fell into. Of the respondents who answered Question 35 (n=6186)

- 2% were 80+ years of age.
- 14% were 70-79 years of age.
- 56% were 60-69 years old.
- 19% were 50-59 years old.
- 4% were 40-49 years old.
- 3% were 30-39 years old.
- 1% were 20-29 years old.
- 0.1% were 10-19 years old.

7.18 The graph below shows a visual breakdown of responses to this question.



7.19 At Question 37, respondents were asked to confirm if they have any physical or mental health conditions or illnesses that have lasted, or are likely to last, for 12 months or more. Of the respondents who answered Question 37 (n=6154), 34% confirmed that they did, whilst the majority (66%) said that they did not.

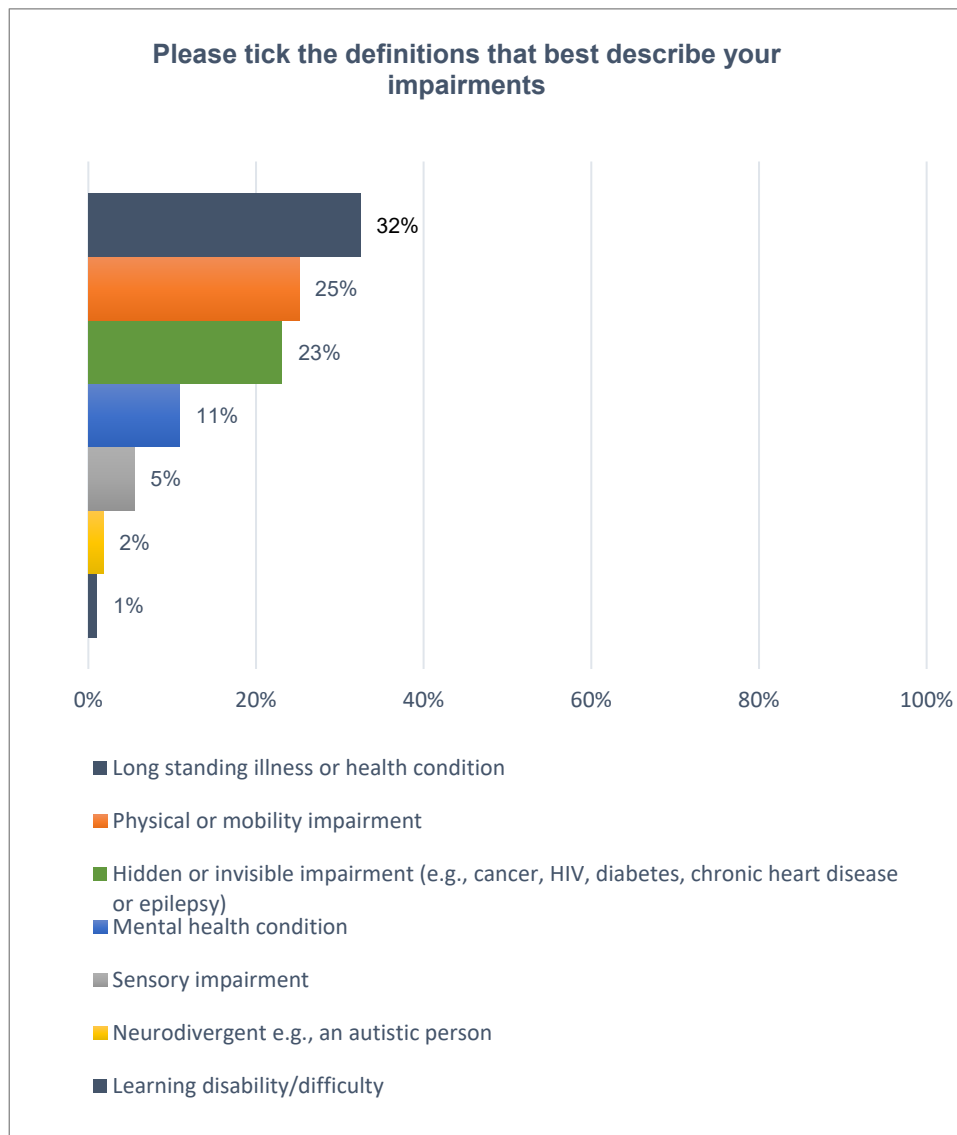
7.20 At Question 38, respondents were asked (if they had answered yes to Question 37) to tick the definitions that best described their impairments. 2155 respondents answered this question, however, as individuals were encouraged to tick all definitions that applied, some may have selected more than one answer.

7.21 Of the respondents who answered Question 38:

- 32% had a long-standing illness or health condition.
- 25% had a physical or mobility impairment.
- 23% had a hidden or invisible impairment.
- 11% had a mental health impairment.
- 5% had a sensory impairment.
- 2% were neurodivergent.
- 1% had a learning disability or difficulty.

7.22

The graph below shows a visual breakdown of responses to this question.

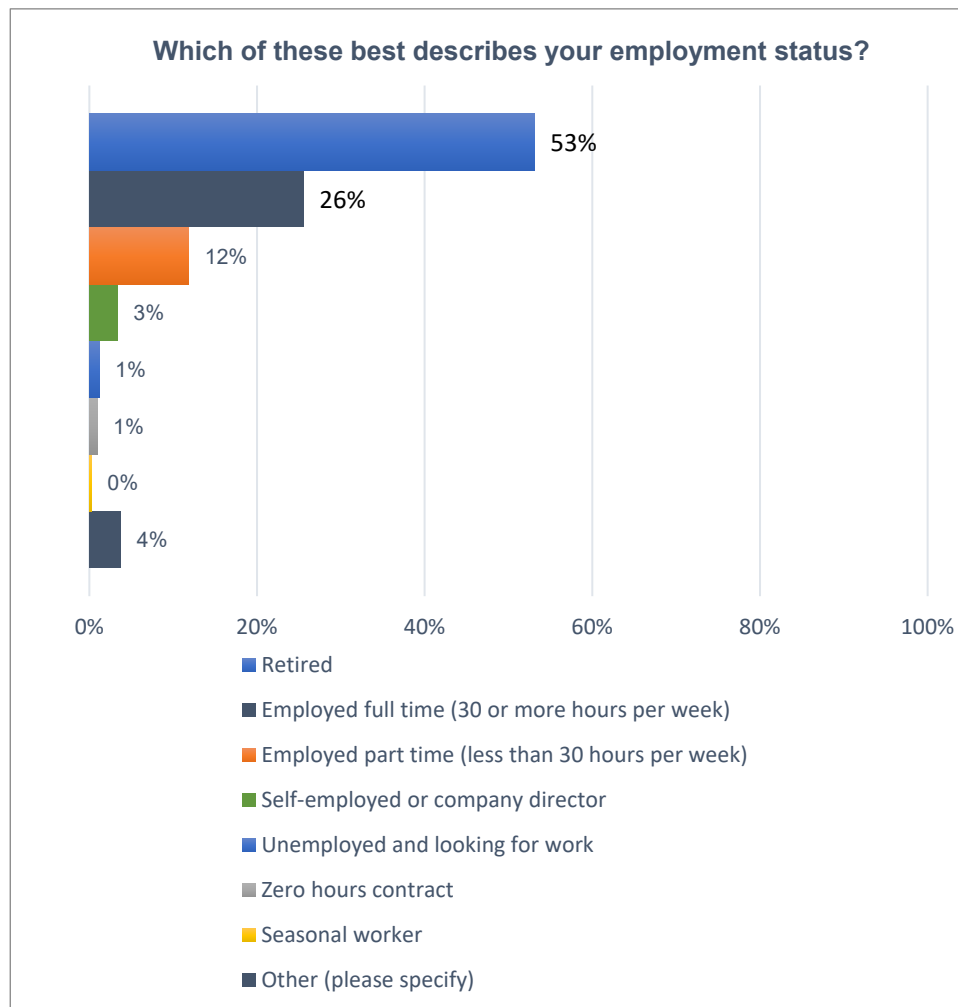


7.23

At Question 39, respondents were asked to confirm their employment status. Of the respondents who answered Question 39 (n=6182):

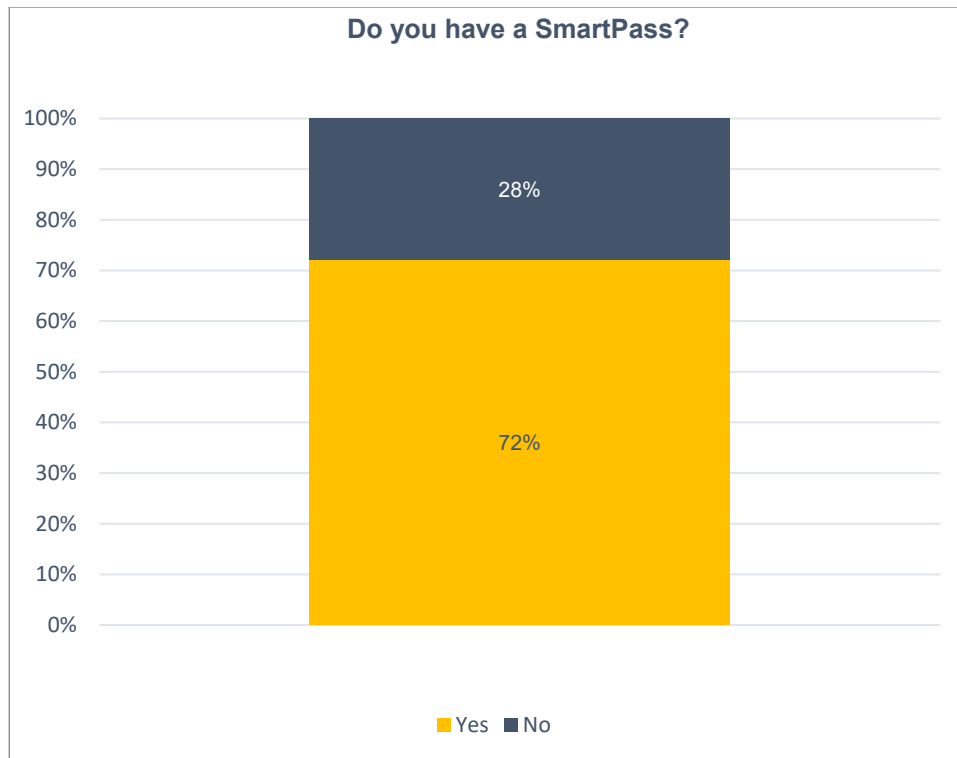
- 53% were retired.
- 26% were employed full-time (30 or more hours per week).
- 12% were employed part-time (less than 30 hours per week).
- 3% were self-employed or a company director.
- 1% were unemployed and looking for work.
- 1% were on a zero hours contract.
- 0% were a seasonal worker.
- 4% of respondents selected 'Other' and specified alternative employment types such as 'volunteer' or 'housewife'.

7.24 The chart below shows a visual breakdown of responses to this question.



7.25 At Question 39, respondents were asked if they had a SmartPass. Of the respondents who answered Question 39 (n=6198), the majority (72%) said that they held a SmartPass while 28% said that they did not.

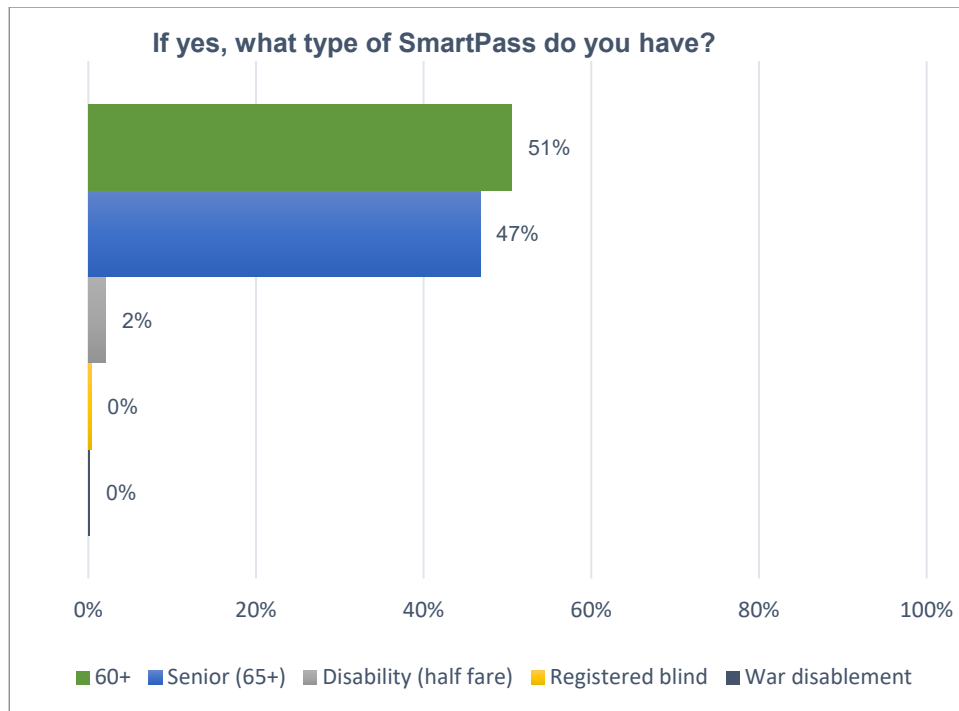
7.26 The chart below shows a visual breakdown of responses to this question.



7.27 At Question 40, respondents who said that they held a SmartPass, were asked what type of SmartPass they had. Of the respondents who answered Question 40 (n=4482);

- 51% held a 60+ SmartPass.
- 47% held a senior (65+) SmartPass.
- 2% held a Disability (half-fare) SmartPass.
- 0.4% held a registered blind SmartPass.
- 0.2% held a war disablement SmartPass.

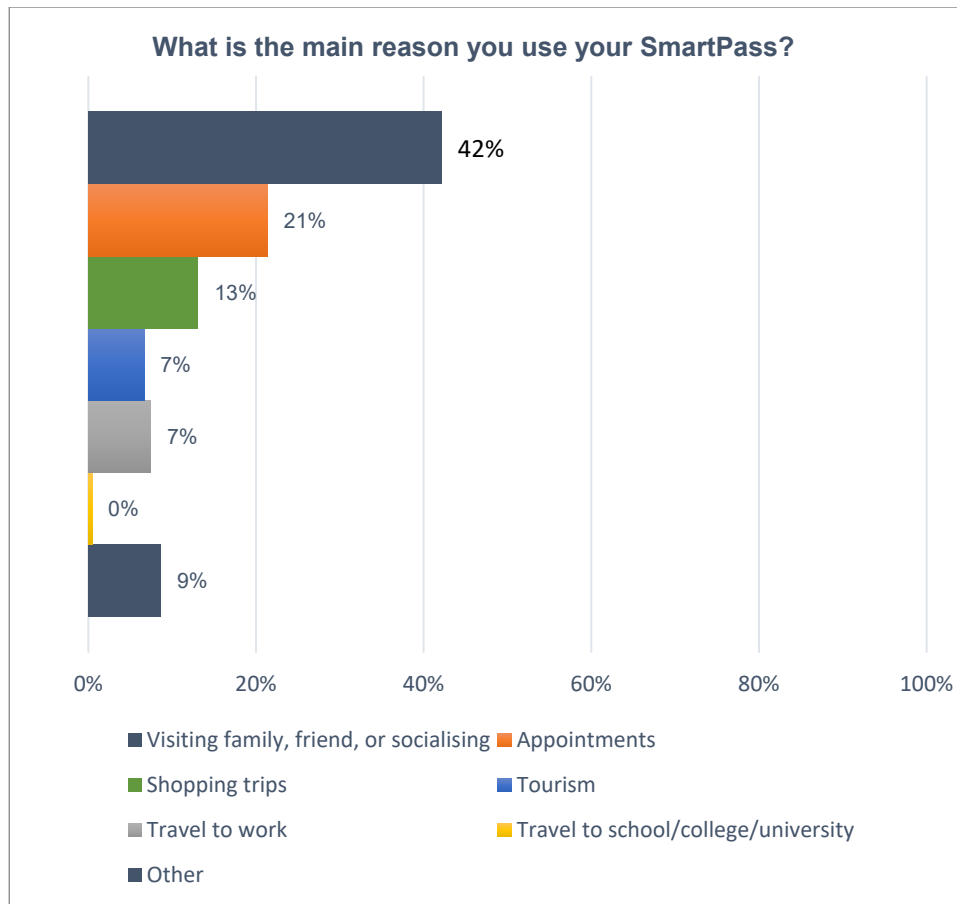
7.28 The graph below shows a visual breakdown of responses to this question.



7.29 At Question 41, respondents were asked what the main reason was they used their SmartPass. Of the respondents who answered Question 41 (n=4524):

- 42% use their SmartPass for visiting family, friends or socialising.
- 21% use it for appointments.
- 13% use it for shopping trips.
- 7% use it to travel to work.
- 7% use it for tourism.
- 0.5% use it for travel to school, college or university.
- 9% of respondents use their SmartPass for other means, which included for volunteering purposes and a mix of the above.

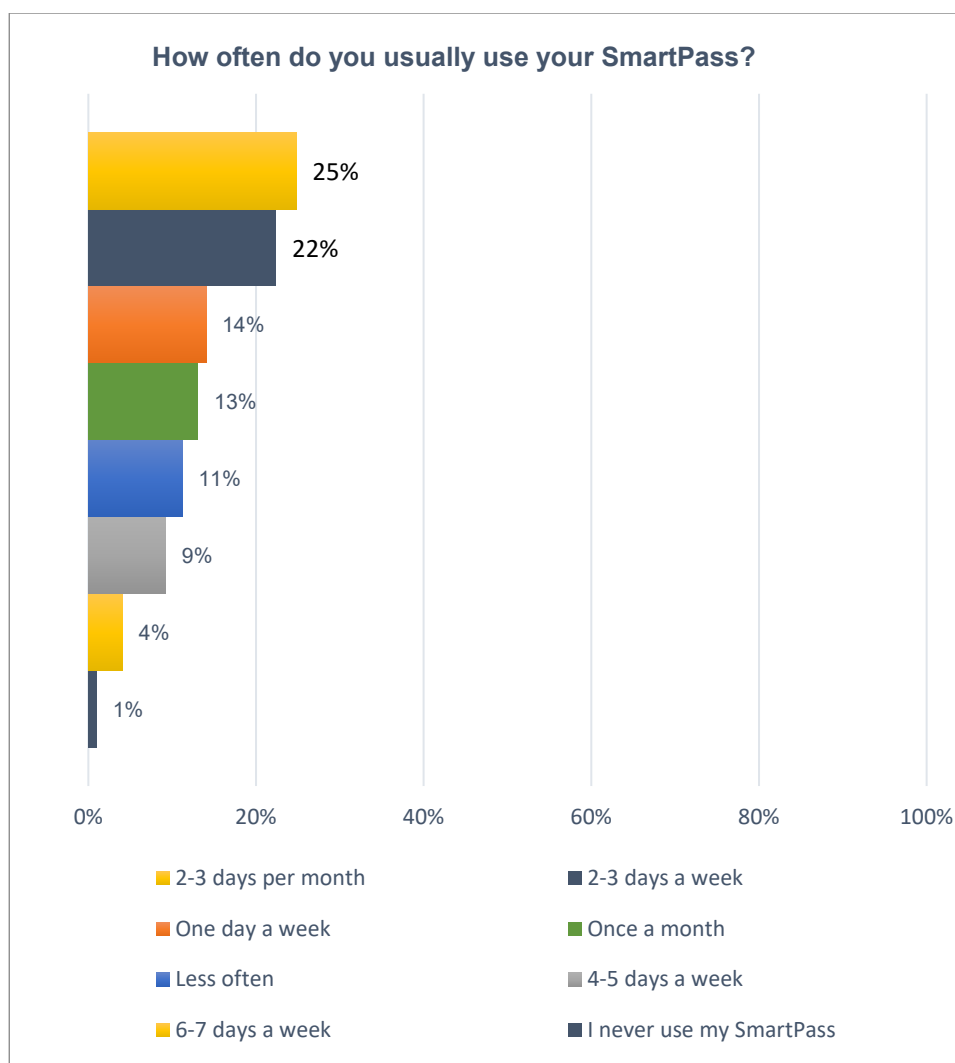
7.30 The chart below shows a visual breakdown of responses to this question.



7.31 At Question 42, respondents were asked how often they would usually use their SmartPass. Of the respondents who answered Question 42 (n=4515):

- 4% use it 6-7 days per week.
- 9% use it 4-5 days per week.
- 22% use it 2-3 days per week.
- 14% use it one day a week.
- 25% use their SmartPass 2-3 days per month.
- 13% use it once a month.
- 11% use it less often.
- 1% never use their SmartPass.

7.32 The chart below shows a visual breakdown of responses to this question.



Comments on the draft EQIA - Question 43

7.33

At Question 43, respondents were asked to provide comments on the Department's draft Equality Impact Assessment (EQIA). This is the document in which the Department assesses the impacts of the proposed Options on different equality groups⁷ in line with its statutory equality duties.

Options 1-4 – Foreseeable Adverse Impacts

7.34

In summary, responses to Question 43 and equality related comments received in relation to the consultation more generally, agreed with those adverse impacts identified in the draft EQIA report.

⁷ People of different religious belief, political opinion, racial group, age, marital status or sexual orientation, men and women generally, persons with a disability and persons without, persons with dependants and persons without.

- 7.35 In particular, older people and their representatives highlighted that **Option 1, raising the age of eligibility for the Scheme to 65 or State Pension Age**, would have serious adverse impacts on some older people, particularly those on low incomes.

‘Stripping [older people] of an essential means of transport to attend GP appointments, hospital appointments, attend day activities, visiting friends & family, post office / banking services and links to the public transport network not only negatively impacts on their mental health but takes away their independence causing them to rely more heavily on friends and family.’ (Older Person’s Commissioner)

- 7.36 Some organisations also agreed that the intersection of age with characteristics such as gender and ethnicity would mean that some people *within* equality groups would be more impacted than others by changes to the Scheme’s eligibility, especially those living alone, in poverty or those at risk of social exclusion.

‘It is important to note that older people are not a homogenous group, there are people from marginalised groups within the older population that are at heightened risk of social exclusion, for example based on gender, ethnicity, social class or disability. If older people’s access to concessionary travel is reduced, those with intersecting identities may be even more at risk of social exclusion and isolation.’ (NI Human Rights Commission)

- 7.37 Women’s sector organisations agreed with the findings of the draft EQIA that raising the age of eligibility for the Scheme may have a more severe impact on women (compared to men) and called for a more detailed analysis of the impacts of this Option on older women, particularly those living in rural areas. Organisations commented that women in rural areas would be disproportionately disadvantaged by raising the age of eligibility for the Scheme as they are often reliant on public transport to access other services and make greater use of public transport than men in rural areas⁸. One organisation made the point that:

‘Rural women are particularly vulnerable to “access” poverty, meaning that they are unable to address their financial poverty if they lack access to affordable childcare and transport to allow them to access better paid, better quality jobs.’ (Women’s Regional Consortium)

- 7.38 However, it is worth noting that SmartPass uptake tends to be higher in urban areas than rural areas and women in urban areas are less likely to own a car than women in rural areas.

⁸ Response quotes data from Community Transport Association on Rural Community Transport Partnerships for 2021/22 which showed of the 1,290,408 total trips taken 889,803 (69%) were taken by women)

- 7.39 Consultees also commented that Option 2, to limit SmartPass use to off-peak travel, could have an adverse impact on older and disabled people's ability to do paid or voluntary work, attend early appointments or provide unpaid childcare for working parents (which again, may have a disproportionate impact on women and those with dependents). Respondents to the consultation commented that **Option 3, limiting SmartPass use to bus only**, could also have an adverse impact on people with disabilities by making public transport less accessible, including for those who travel with guide dogs and large wheelchairs or who find buses (in particular, high floor coaches) more difficult to use than trains. Some organisations representing people with disabilities also highlighted that trains have access to toilets, essential for some older and disabled people when travelling.
- 7.40 While many respondents agreed with **Option 4, to introduce a fee for applying, renewing, or replacing a SmartPass**, some organisations highlighted that the Option could have a negative impact on some older and disabled people, if the fee is unaffordable for those on very low incomes or set at a level that would deter those on the lowest incomes from applying.
- 7.41 Finally, some organisations also recommended the Department should also outline how additional data and evidence, obtained through the consultation process, has helped to inform its final decision-making. A few organisations also recommended that the Department gives further consideration to mitigations for *all* the equality impacts that it has identified and sets this out in the final Stage 6 report. These include mitigations to address the impacts of the Options on older women, as well as those with dependents.

Options 5-10 – Foreseeable Positive Impacts

- 7.42 People with disabilities and their representative organisations noted that **Option 5, to extend free half fare travel to full fare travel for people with disabilities**, and **Option 6, to introduce companion travel for people with disabilities** are likely to have a positive impact on disabled people's ability to work or volunteer, socialise, or attend appointments or to visit family and friends.
- 7.43 Many consultees, including the Inclusive Mobility Transport and Advisory Committee (IMTAC) noted that, **Option 7, extending the Qualifying Criteria for a half fare SmartPass in line with other jurisdictions**, has the potential to *"remove the restrictive eligibility criteria currently in place, which is an unnecessary barrier for some people who should be able to benefit from the Scheme"*. Some consultees, including the Equality Commission for Northern Ireland, noted that Options 5-7 are also consistent with the Department's duty to promote equality of opportunity and widen the participation of people with disabilities in public life, as well as promoting greater accessibility for disabled people, as set out in Article 9 of the UN Convention on the Rights of Persons with Disabilities.

- 7.44 Some organisations working in the Race Sector, including the Law Centre, commented that **Option 8, to extend the concessionary fares scheme to asylum seekers and victims of human trafficking**, would also promote the social inclusion of another traditionally marginalised group, providing access to education and volunteering opportunities, making it easier for asylum seekers to attend medical appointments; to get involved in their children's education; and to comply with the asylum process in relation to appointments.
- 7.45 The Law Centre also highlighted that extending the Scheme to asylum seekers may also make it easier for public authorities to discharge their statutory duties and support the process of refugee integration, a key government objective as set out in the Executive Office draft Refugee Integration Strategy. With regards victims and survivors of modern slavery and human trafficking, similar statutory duties apply.
- 7.46 A few consultees, including the Equality Commission, also commented that **Option 9 and 10 to make the Scheme more accessible for minority groups** would have positive impacts, particularly for people seeking asylum.

'The proposals in options 8-10 as outlined in the consultation document would improve asylum seekers' access to services such as education (including ESOL classes), health and employability training consonant with the vision of The Executive Office's draft Refugee Integration Strategy for 'a cohesive and shared society where refugees and asylum seekers are valued and feel safe, are integrated into communities and are supported to reach their full potential.' (The Equality Commission for Northern Ireland)

8 Analysis of responses at engagement events

- 8.1 This section summarises the key points raised through the focus groups held by the Department over the duration of the consultation with key stakeholders and members of the public.

Option 1: Raising Age Eligibility

- 8.2 Almost all participants in the focus groups who voiced an opinion on Option 1 were opposed to raising the age of eligibility for the Scheme. Participants spoke passionately about the benefits of the Scheme, which was seen as a “lifesaver” and a benefit they look forward to and celebrate receiving, especially after working and paying taxes all their lives. The many benefits of the SmartPass were acknowledged, including help to access appointments and visit elderly relatives; reduction of loneliness and social isolation; improvement in physical and mental health; and support for the economy.
- 8.3 Participants also recognised the role the SmartPass plays in allowing people to lead a full and active life and how it provides an opportunity for social interaction and brings people together.
- 8.4 As well as highlighting the positive benefits of the SmartPass, participants emphasised the negative impact removing the SmartPass would have on individuals, with some participants commenting that, without the SmartPass, some people may not be able to afford to travel and may have to choose whether to “heat, eat, or meet”.
- 8.5 Negative impacts on wider society included pressure on the health system if the benefits of the Scheme are not realised; reduction in volunteering if people have to pay for travel; reduced support for and participation in age friendly events and policies organised by the councils and other organisations; and a loss to the economy if people are travelling less and therefore spending less in cafes and shops.
- 8.6 Participants also highlighted the negative impact on the environment if people started to travel by car instead of paying for public transport; the potential road safety impact if people who are not fit to drive continued driving longer than they otherwise would have; the increased subsidy required for Translink; and the potential rise in fares to off-set the loss of concessionary fares revenue which would impact all passengers.
- 8.7 Only a few participants indicated their support for raising the age of eligibility with some citing the need to reduce the costs of the Scheme as the reason for this. Others were supportive of the proposal if it meant people with disabilities would get free travel, while others did not agree with those still working or earning money being given free transport.

- 8.8 If the age of eligibility is to be raised, many were in favour of applying this to new applicants only, and some participants recommended introducing any changes incrementally.

Option 2: Limiting SmartPass Use to Off Peak Travel Only

- 8.9 The majority of participants who expressed an opinion on Option 2 were unsupportive of limiting the use of the SmartPass to off peak times only.
- 8.10 Participants highlighted the negative impact the proposal would have on the elderly, many of whom like to leave the house early in the morning, and expressed the view that this proposal could constitute age discrimination.
- 8.11 Participants were also concerned that the proposal would discriminate against people with a disability who needed to travel to work and suggested that this group should be exempt.
- 8.12 Participants were also concerned that limiting travel to off-peak times would hinder attendance at hospital or other appointments. A suggestion was made that if this proposal was introduced, the Department should work with the Department of Health to ensure medical appointments were scheduled after 09:30 as people may not be able to afford to travel if they had to pay to do so before 09:30.
- 8.13 The impact on those who lived in rural areas with infrequent services was also raised as was the view that this would only deliver small savings.
- 8.14 Those who were supportive of the proposal felt that SmartPasses should not be used by those who are going to work.

Option 3: Limiting SmartPass Use to Bus Only Travel

- 8.15 All participants in the focus groups were opposed to limiting the SmartPass to bus only travel.
- 8.16 Participants raised concerns about the negative impact on people with a disability and highlighted that buses could only accommodate one wheelchair at a time meaning that two wheelchair users could not travel together. It was also highlighted that not all buses are suitable for users with mobility issues and that trains were more accessible.
- 8.17 Participants also stated that blind people find it easier to use the train independently and that unlike buses, trains were more suitable for guide dogs. Rail travel was also felt to provide more comfort to those with certain medical conditions as there were better facilities available.
- 8.18 Participants emphasised that rail travel was essential to facilitate early morning or late evening appointments and suggested that limiting SmartPass travel to bus only could affect the viability of train services.

Participants also commented that this proposal would only generate a small amount of savings and suggested allowing SmartPass users to purchase a return ticket for journeys. As users are currently only permitted to purchase single tickets, this may be a better cost saving exercise.

Option 4: Application, Renewal and Replacement Fees

8.19 There were mixed views across the focus groups in relation to Option 4. Participants who were supportive of the proposal felt that a small fee as outlined in the consultation would be acceptable if would help to reduce costs and maintain the Scheme.

8.20 Participants who did not support the proposal expressed concern that not everyone would be able to afford the fee and that introducing a fee could increase administration costs. Concern was also expressed that charging a fee could put people off from applying for a SmartPass and consequently this could lead to people who are no longer fit to drive continuing to do so.

8.21 Participants also commented that while the Department may intend to introduce a small fee, this will likely rise over time with inflation becoming more unaffordable for some. It was also highlighted that people living in rural areas do not have the same access to public transport services and therefore charging the same fee for those in rural areas would be unfair.

Option 5: Free Travel for Those Currently Receiving a Half Fare Concession due to a Qualifying Disability

8.22 There was widespread support across the focus groups for Option 5 with participants expressing the view that this would be the sign of a socially inclusive society and would help greatly with the increased cost of living. This would also align with other jurisdictions that already offer a more generous concession.

8.23 Participants voiced the opinion that this proposal would be life changing for those with disabilities who have been heavily impacted by the cost-of-living crisis. Additionally, some groups who currently receive a half-fare concession face the same barriers as those who get free travel e.g., partially sighted people face similar challenges to people who are registered blind and therefore should be entitled to the same concession as those who are registered blind.

8.24 The only concern expressed by participants was that people with disabilities may already be getting support with transport and qualify for a car.

Option 6: Companion Passes for Disabled People Unable to Travel Alone

- 8.25 All participants in the focus groups who expressed an opinion on Option 6 were supportive of the proposal to provide companion passes for disabled people who are unable to travel alone.
- 8.26 It was recognised that a companion can greatly help with confidence while traveling and can help users travel to appointments. A view was also expressed that someone having to pay for a companion's fare because they could not travel alone negated the value of the SmartPass.
- 8.27 It was suggested that the criteria for a companion pass could be aligned with those used in other jurisdictions.
- 8.28 Whilst supporting the proposal, participants expressed concern that it could be open to abuse and stated that it would need to be regulated to ensure this was not the case.

Option 7: Extend the Qualifying Criteria for a Half Fare SmartPass in Line with Other Jurisdictions

- 8.29 The only views expressed on Option 7 were that the eligibility criteria should include neurological conditions and that any changes should be reflected in community transport.

Option 8: Free Transport for Those Receiving Asylum Support and Victims of Human Trafficking

- 8.30 The majority of participants in the focus groups who expressed an opinion on Option 8 were supportive of offering free transport to asylum seekers and victims of human trafficking. It was stated that the difficulties asylum seekers face is in breach of the Human Rights Act, Articles 3 and 13. Participants also acknowledged that transport is one of the biggest barriers and causes of social exclusion and were of the view that having access to travel would help asylum seekers to integrate into local society and move forward.
- 8.31 Participants highlighted that asylum seekers receive very little towards the cost of travel but have to attend many interviews, for example, with the Home Office, solicitors and the courts. They may also have complex medical needs that require regular attendance at appointments as well as children being assigned to schools outside of walking distance. Participants also suggested that having access to free transport would enable asylum seekers to undertake voluntary work while waiting for their applications to be processed.
- 8.32 During engagement events held for asylum seekers and those with lived experience, participants commented that life as an asylum seeker can be very isolating. Not having permission to work means that many asylum seekers have little to do and stay mainly in their rooms or hotels. This has a significant impact on their mental health (especially when coupled with the trauma they have already experienced before arriving to Northern Ireland).

- 8.33 Participants commented that access to transport was their biggest barrier to social inclusion. While many government initiatives were free, such as summer schemes, activities, classes etc., transport was not and many could not afford the bus fare to attend. Participants said it is common-place for asylum seekers to have to walk long distances to attend English classes or other services and amenities.
- 8.34 Participants suggested that making travel free for asylum seekers would enable organisations and government departments to deliver more support while significantly reducing isolation and the harm it causes, making it a good use of public funding.
- 8.35 Whilst supporting the proposal, participants expressed concern that there could be a stigma attached to it and that it could cause resentment. A view was also expressed that the Home Office should provide the funding.
- 8.36 One participant who was unsupportive of the proposal commented that asylum seekers already get help for travel in their financial support and that this proposal could constitute double funding. Others were concerned that providing free travel would reduce the small amount of support asylum seekers get from the government. Some participants suggested that if this was the case, asylum seekers should be able to choose whether to accept a SmartPass or keep the transport allocation of their funding.

Option 9: Changes to the Residency Test

- 8.37 There was limited discussion on Option 9 across the focus groups. Participants who expressed an opinion all felt that the residency test should be removed, however, there was also a view that care was needed to ensure that costs were not increased by opening the Scheme to too many people.

Option 10: Proving Residency

- 8.38 Participants in the focus groups did not express any opinions on Option 10.

Other issues raised

- 8.39 Participants suggested that moving the application process online may reduce costs, however, cautioned that people would still need to have the option to apply in person or by post. Other suggestions to reduce the costs of the Scheme included allowing users to purchase tickets on the Translink app; reviewing the reimbursement rates paid to operators; and allowing users to purchase return or day tickets rather than having to buy a single ticket for each journey. It was also highlighted that any reduction in concessionary fares will increase the subsidy required by Translink and could have a negative impact on the number and frequency of services provided.

- 8.40 The wider benefits of the Scheme were recognised by participants and that these contribute to the work of other departments; in which case, other departments should contribute to the costs of the Scheme.
- 8.41 Participants also acknowledged the climate change crisis and commented that the Government should be working towards expanding free transport to everyone, not reducing eligibility under the Scheme. Providing a half-fare concession to those aged 60-64 may therefore be a better option than removing eligibility from this age group as it would encourage people to increase their use of public transport at a younger age.

9 Campaign responses

- 9.1 Campaign responses are when organisations (or individuals) coordinate responses across their membership or support base, often by suggesting a set of wording for respondents to use. Campaign responses are usually very similar or identical to each other and can help provide an indication of the strength of feeling on an issue.
- 9.2 For this consultation, campaign responses have been analysed separately to responses on Citizen Space to ensure the breadth of views received are summarised effectively and efficiently.
- 9.3 Campaigns included standard campaign responses, where the respondents had simply added their name to the standard text provided by the campaign organiser without making any changes to it, and non-standard campaign responses, where the respondents had edited the standard text provided by the campaign organiser or added their own comments to it before submitting it.
- 9.4 During analysis, three separate campaigns were identified:
- Defend Free Travel for Over 60's
 - Campaign Questionnaire (organised by Carla Lockhart MP)
 - A hard copy letter campaign (source unknown)

Defend Free Travel for Over-60's

- 9.5 822 responses were submitted in total for this campaign, of which 604 were standard campaign responses.
- 9.6 The standard campaign document consisted of a template with text boxes for respondents to include their name, address, email address and telephone number.
- 9.7 The standard Campaign letter text included the following:
- The consultation is a cynical attempt to cut costs.
 - Removing free travel for over-60's will be a blow for those who rely on their travel pass, particularly during a cost-of-living crisis.
 - The SmartPass is a lifeline for over-60's experiencing social isolation.
- 9.8 A further 218 non-standard campaign responses were received where respondents added additional comments to the above via a blank text box on the template.
- 9.9 Respondents sometimes commented that:
- The SmartPass is essential and should be retained.

- Without the SmartPass they would not be able to get out of the house to attend appointments or social events as they could not afford to pay for transport.
- Removing the SmartPass would negatively impact on mental health.
- The elderly who had paid into society all their lives deserved free transport when they reached 60.
- Public transport was their only means of transport as they could not drive or have access to a car.
- The Department should not be removing free transport when the cost of living is increasing.
- Removing the SmartPass would have a negative impact on the environment.

Campaign Questionnaire

- 9.10 61 responses were submitted in the form of a questionnaire in a campaign organised by Carla Lockhart (MP).
- 9.11 The campaign questionnaire took the form of a template consisting of seven questions taken directly from the consultation document and the response to each question was pre-filled. Respondents were also asked to complete a number of blank text boxes that held personal details and publishing preference.
- 9.12 The questions and corresponding answers are set out in table the below:

Question	Answer
Question 1: Do you think changes should be made to the age eligibility for the Scheme?	No
Question 2: If the Department was to introduce changes to the age eligibility, what is your preferred option?	Increase age eligibility to 65 and apply this change to new applicants only
Question 5: Do you think that SmartPass users who hold an age related SmartPass (60+ and Senior (65+)) should be able to use their SmartPass before 9.30am?	Yes
Question 6: Do you think that SmartPass users who hold a disability related SmartPass should be able to use their SmartPass before 9.30am?	Yes
Question 9: Do you think that SmartPass users who hold an age related SmartPass (60+ and Senior (65+)) should be able to use	Yes

their SmartPass on rail?	
Question 10: Do you think that SmartPass users who hold a disability related SmartPass should be able to use their SmartPass on rail?	Yes
Question 13: Do you think the Department should introduce a fee for the SmartPass?	No (if necessary, a replacement fee – as it is in England)

Standard Campaign Response (source unknown)

9.13 Three campaign responses were submitted in the form of a template hard copy letter. The source of this campaign is unknown; however, all letters followed the same format of a written letter.

9.14 The following points were included in the standard Campaign letter text:

- Concern about changes to the 60+ SmartPass
- Opposition to the proposed removal of free transport after a lifetime of using public transport in the Greater Belfast area (and the associated payment).
- A feeling that it is morally wrong to take away access to public transport for people who use it for social interaction
- Free public transport affords older people psychological support and allows older people to avoid social interaction
- The SmartPass assists older people to exercise daily while walking to the bus/train stop.

10 Petitions

- 10.1 The consultation received six submissions which have been classified as petitions for the purposes of this analysis. The petitions comprised of an initial petition statement, followed by a list of signatories and their contact details or postcodes. Across the petitions submitted, 11,801 signatures were collected.
- 10.2 Some petition organisers also provided further background information for signatories and in some cases, petition signatories were also able to write brief comments alongside their signature. Petitions were submitted to the Department in both electronic and paper format.
- 10.3 In all cases, petitions called for the Department to keep age eligibility for the Scheme at 60, however, some petitions also referenced other questions from the consultation document.
- 10.4 The table below shows the list of the petition organisers; details of how the petition was submitted; and the consultation questions addressed by the petition statement. Details of petition texts are provided in Annex C.

Petition Name	Petition Organiser	Submission method	Questions addressed by petition statement	Petition Signatories
Stop the Cuts to Free Public Transport for Seniors in Northern Ireland	John Boyle	Online petition through Change.org (with option to include comments)	Questions 1,5,6,9,10, and 13	355
Keep Free Public Transport for over 60s	Nicola Browne Act Now/Uplift/ 38 Degrees	List of signatories submitted via email	Question 1	1042
SmartPasses petition – Uplift	Nicola Browne Act Now/Uplift/ 38 Degrees	List of signatories submitted via email	Question 1	572

Protect free travel for the Over-60's/Expand Public Transport	People Before Profit	Paper petition Postcards (with option to include comments)	Questions 1,5,6,9,15, 17,19 and 21	185
Petition to Department for Infrastructure (Dfi) concessionary fares eligibility consultation	People Before Profit	Paper Petition (Print out of signatures via Change.org)	Questions 1,5,6,9,15, 17, and 21	1146
Save the SmartPass - oppose cuts to the Concessionary Fares Scheme in NI!	Unison	Online petition through Change.org	Questions 1,5,6,9,10, and 13	8501

10.5 Respondents who added comments to their petition signatories sometimes remarked that:

- The SmartPass is important to older people and should be retained.
- The SmartPass is invaluable for elderly people to meet with friends to avoid the loneliness of old age.
- Making the proposed changes to the SmartPass would have a negative social and economic impact on the 60+ age group.
- Changes such as these will mean less bus and train usage leading to job losses and reduced services.
- After working all their lives and paying taxes, older people have earned this concession.

Annex A – Organisational respondents (list)

60+ Luncheon Club Loughbrickland
Age Friendly Network NI
Age N.I.
Ahoghill music group
Alliance Party
Antrim and Newtownabbey Borough Council
Ballymena, Antrim and District Trades Council
Ballynure And District Friendship Club
Barnardo's NI
Belfast CHA Rambling Group
Belfast City Council
Belfast East Seniors Forum
Belfast Healthy Cities
Belfast U3A
Belfast unemployed resource centre
BPW NI (Business & Professional Women)
British Heart Foundation Northern Ireland
Carryduff Retirement Association
Children in Northern Ireland (CiNI)
Compass Advocacy Network Ltd
Consumer Council
Conway Education Centre
COPNI
Creative Local Action, Responses and Engagement
CSPA - Civil Service Pensioners' Alliance
CTA - Community Transport Association UK
CWU NITB Branch Secretary
Derry City and Strabane District Council
Disability Action
Donaghadee Community Development Association
Down Community Transport
Democratic Unionist Party
Eglantine Mothers Union
Engage with Age - East Belfast Network Centre
Epilepsy Action NI
Equality Commission NI (ECNI)
Every Nation Church Belfast
Fane Street Primary School
Fermanagh branch U3A
Fermanagh Community Transport Ltd
Fermanagh Council of Trade Unions
Fermanagh Sports & Cultural awareness Association
FODC - Fermanagh and Omagh District Council's
Greater Belfast Seniors Forum
Guide dogs blind
Guide Dogs NI
IES
IMTAC
Intercultural Education Service, Education Authority Northern Ireland

Irish Communist Party
 Larne House Visitor Group
 Law Centre NI
 Linking Generations NI
 Lisnaskea Women's Group
 Mental Health Foundation
 Mid and East Antrim Borough Council (MEA)
 Migrant Help
 Mothers' Union
 NFOP - Royal Mail, Post Office & BT Pensioners Northern Ireland
 NHSCT – Northern Health and Social Care Trust
 NIC-ICTU Irish Congress of Trade Unions NI Committee
 NICRE - Northern Ireland Council for Racial Equality
 NIFHA - Northern Ireland Federation of Housing Associations
 NIHRC NI Human Rights Commission
 NIPSA
 NIWBG - Northern Ireland Women's Budget Group
 North Belfast Senior Citizens Forum
 North Down & Ards U3A
 North Down YMCA
 Northern Trust
 NPC NI (National Pensioners Convention)
 NUS-USI
 One Friend Combat Loneliness Group
 Out and About Community Transport
 Parkinsons UK Northern Ireland
 PCI
 PPR - Participation and the Practice of Rights
 Professor Austin Smyth
 RASNI-VOICES
 Refugee and Asylum Support and Integration Division - TEO
 RNIB
 Shantallow community centre
 Sinn Fein
 SIPTU & GMB Unions.
 Social Democratic & Labour Party
 South Belfast Lifestyle Forum
 South Eastern Health & Social Care Trust
 South West Age Partnership (SWAP)
 Southern Age Well Network
 St. Guaire's Church, Aghadowey
 Sustrans
 The Link Family and Community Centre
 The Omnibus Partnership
 The Rainbow Project NI
 TSSA - The Transport and Travel Union
 U3a
 U3A Foyle
 Unison
 UNISON NI

Unison Retired Members Forum
Unite the Union
Vineyard Compassion
Wellbeing Clinic Belfast
West Belfast+50 Plus G6
Women's Policy Group NI (WPG)
Women's Regional Consortium
Women's Platform
Workers Party

11 Annex B – Focus Groups

11.1 Face to face focus groups were held for participants from the following groups:

- Older Persons Consultative Forum (20th June 2023)
- Cedar Lodge Foundation (21st June 2023)
- The British Deaf Association (23rd June 2023)
- The Refugee and Asylum Forum (1st August 2023)
- Lived experience group - facilitated through Mediation NI (28th July 2023)
- Lived experience group – facilitated through Law Centre (4th August 2023)

11.2 Online focus groups were held for participants from the following groups:

- IMTAC (Inclusive Mobility and Transport Advisory Committee) (13th June 2023)
- AGE NI (14th June 2023)
- Engage with Age (16th August 2023)
- Guide Dogs and RNIB VI (24th August 2023)

11.3 A combination of online/face to face focus groups were also facilitated by Age Friendly Coordinators from the following council areas:

- Ards and North Down (15th June 2023)
- Derry and Strabane District Council (23rd June 2023)
- Fermanagh and Omagh District Council (29th February 2023)
- Armagh, Banbridge and Craigavon District Council (3rd July 2023)
- Causeway Coast and Glens District Council (5th July 2023)
- North Down and Ards (25th July 2023)
- Mid Ulster (15th June 2023)

12 Annex C – Petitions

Stop the Cuts to Free Public Transport for Seniors in Northern Ireland – Petition Text:

“Over 340,000 people aged 60+ hold a SmartPass in Northern Ireland. The SmartPass (Concessionary Fares) scheme enables people over 60, or those with eligible disabilities, to access public transport for free in Northern Ireland. This scheme is now facing major cuts. The Department for Infrastructure intends to:

- *Raise the age limit to 65 instead of 60; cutting tens of thousands of people off the scheme altogether.*
- *Remove free access to rail transport and limit usage of the SmartPass to bus-only.*
- *Restrict usage at peak times i.e. SmartPass holders will not be able to avail of free transport in the mornings before 9.30am.*
- *Introduce Application, Renewal, and Replacement fees.*

Our senior citizens have spent their entire lives working and paying taxes, a free ticket for a bus or a train is a small price to pay in return for their lifelong contribution to society. These cuts will make it much harder for many elderly and disabled people to access public transport, especially those in rural areas. We must oppose these austerity cuts to ensure that public transport remains accessible for all!

Please sign this petition to let the Department for Infrastructure know that we will not accept these cuts!”

Keep Free Public Transport for over 60's and SmartPasses Petition Uplift – Petition Text:

“Drop plans to cut free public transport for those over 60 in Northern Ireland.

Why is this important?

The 60+ SmartPass which allows free public transport in Northern Ireland for the over 60's is vital for many to live their lives with independence. But right now, the Department for Infrastructure is thinking about scrapping them. Free public transport means people are able to socialise, meet their family and take part in society with fewer obstacles. In a cost of living crisis, it's vital that people over 60 in Northern Ireland retain this support.”

Protect free travel for the Over-60's/Expand Public Transport – Petition Text:

‘To the Department for Infrastructure, We Undersigned, Support:

- *Keep free travel for over-60's*
- *No reduction of access to travel times or rail*

- *Extending full SmartPass for all qualifying with a disability & companion travel for all with a disability unable to travel alone*
- *Extending qualifying criteria to support the vulnerable, asylum seekers & victims of human trafficking'*

Petition to Department for Infrastructure (DfI) concessionary fares eligibility consultation – Petition Text:

'We, the undersigned, support:

- *Keeping free travel for Over-60's with no reduction of access to travel times or rail*
- *Extending full SmartPass to those qualifying with a disability & companion fare for disabled people unable to travel alone*
- *Extend qualifying criteria to support the vulnerable, asylum seekers & victims of human trafficking*
- *School Age Universal Free Public Travel*
- *Expand routes, increase stops, improve signage, bus shelters & bus lanes'*

Save the SmartPass - oppose cuts to the Concessionary Fares Scheme in NI! – Petition Text:

"The Department for Infrastructure is considering proposals to change free and discounted fares on public transport under the NI Concessionary Fares Scheme.

*Currently, the Concessionary Fares Scheme provides **free fares for travel on buses and trains** for those aged 60 and above, people who are registered blind and war disablement pensioners. The Scheme also provides **half fares for travel on buses and trains** for many people living with physical and mental disabilities, as well as those who can't drive due to medical reasons. Those who are aged 65 and over can also enjoy **free cross-border travel** under the Scheme.*

The Department is now considering the following options for reducing the cost of the Scheme:

- *Raising age eligibility for the SmartPass **from 60 to 65** (or to the State Pension Age)*
- *Limiting SmartPass use to **off-peak travel** (after 9.30am on weekdays)*
- *Limiting SmartPass use to **bus travel only***
- *Introducing **application, renewal and card replacement fees** for SmartPass users*

*Concessionary travel schemes are important because they empower older people and people living with disabilities to continue to lead independent lives and to participate in their communities. **Free (or discounted) and accessible public transport** makes it easier for*

people to socialise, work, volunteer, attend appointments and provide care for friends and family.

If the Department goes ahead with these cuts, some of the most vulnerable people in our society will suffer. Cutting access to free and affordable public transport will worsen poverty, increase social exclusion and have a negative impact on many people's physical and mental health. It could also harm our the local economy, as fewer people will travel to town and city centres to shop. Cutting concessionary fares might also mean that some transport routes will become less popular, putting those routes and services at risk of being shut.

Please sign this petition today to oppose these cuts during the ongoing cost of living crisis and rapidly escalating climate crisis.”

13 Glossary

Citizen Space	Government's online consultation portal
Citizen Space Responses	Responses from individuals and organisations submitted directly through Citizen Space and Easy Read responses and email comments from individuals uploaded to Citizen Space
Coding Framework	Used for qualitative analysis, the coding framework was developed using Excel to identify and record the key themes in responses to open-ended questions
Qualitative Analysis	Analysis of open-ended questions or written submissions from which key themes were drawn
Quantitative Analysis	Analysis of survey questions that a numerical value could be easily attributed to e.g. responses to closed questions on Citizen Space
Substantive Responses	Citizen Space responses and organisational responses received via email or post