

Northern Ireland Concessionary Fares Consultation: Summary of Responses

Summary Report

June 2024

Table of Contents

1	THE CONSULTATION	. 3
2	CONSULTATION RESPONSES	. 4
3	MAIN FINDINGS	. 4
4	KFY THFMFS	. 6

1 The consultation

- 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	Option 1: Raising the age of eligibility for			
would reduce	concessionary fares			
the cost of the	Option 2: Limiting SmartPass use to off-peak travel			
Scheme	Option 3: Limiting SmartPass use to bus travel			
	only			
	Option 4: Application, renewal, and replacement			
	fees			
Options which	Option 5: Free travel for those currently receiving a			
would increase	half fare concession due to a qualifying disability			
social inclusion	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			

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 videos (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.

2 Consultation responses

2.1 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%
Substantive Responses	7,451	37%
Total responses received	20,138	100%

- 2.2 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.
- 2.3 The remaining 37% of responses were substantive responses from individuals and organisations (submitted via Citizen Space, Easy Read, email and post).
- 2.4 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.
- 2.5 95% of substantive responses were submitted directly through Citizen Space and 3% through an Easy Read. Not all respondents answered every survey question.
- 2.6 Further information on how we analysed the responses can be found in the main Consultation Summary Report.

3 Main findings

For the purposes of the analysis, the Easy Read responses and email comments from individuals were uploaded to Citizen Space and analysed with the individual and organisational responses submitted directly through Citizen Space. These collectively comprise the "Citizen Space responses" referred to throughout this report.

- 3.2 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.
- 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.
- Taking into account all responses received to the consultation, 91% of respondents were opposed to raising age eligibility.
- 3.5 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.
 - A small majority (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.

4 Key themes

- 4.1 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). Further information on the key themes can be found in the main Consultation Summary Report.
- 4.2 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

- 4.3 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.
- 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

- 4.5 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.
- 4.6 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

4.7 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.

- 4.8 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.
- 4.9 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

- 4.10 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.
- 4.11 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

- 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. It would be unfair to charge a fee for the SmartPass on this basis also.
- 4.13 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

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.'

4.15 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

4.16 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

- 4.17 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.
- 4.18 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

4.19 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

4.20 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.