

NI Concessionary Fares Scheme Consultation Draft Stage 6 EQIA Report

In fulfilling its obligations under Section 75 of the Northern Ireland Act 1998 (Section 75), the Department for Infrastructure (the Department) is required to equality screen its policies to determine whether they should be subject to a full equality impact assessment (EQIA). An EQIA is a policy development tool that helps government departments consider the likely impact of policy changes on different groups of people.

The Department for Infrastructure has undertaken an EQIA to help inform its review of eligibility for the NI Concessionary Fares Scheme. When undertaking an EQIA, the Department follows the guidance issued by the Equality Commission which recommends that there should be seven stages in the EQIA process.

This draft document presents the findings of the first five stages of the EQIA process and Stage 6, publication of the report on the results of the Department's EQIA. It will be further updated with the Minister's final decision and rationale, following the consultation on the EQIA on the DFI budget for 2024/25, which is available on the Department's website.

Once finalised, a summary of the Stage 6 report will also be made available.

June 2024

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1 Executive Summary

- 1.1 The Department's public consultation on proposed changes to eligibility for the NI Concessionary Fares Scheme (the Scheme) closed on 24th August 2023, following a 12-week consultation period. Using responses received as part of the public consultation, including the draft EQIA, the Department has identified foreseeable equality impacts (both positive and negative) of the ten options identified in the consultation document.
- 1.2 While the Minister has taken account of the equality impacts identified and intends to make some changes to the Scheme, he is seeking further views on the equality impacts that these changes will have. Responses will be considered as part of the consultation on the EQIA on the draft budget for DfI for 2024/25, which has just been launched and sets out the Department's proposed spending plans for next financial year.

Minister's Decision [subject to consultation on the EQIA on the budget for 2024/25]

- 1.3 Having considered the outcome of the public consultation, the Minister intends to make no changes to the age eligibility for the Scheme. All SmartPass holders will also continue to be able to travel on both bus and rail at any time of the day. However, in order to help protect the Scheme and manage costs, the Minister intends to introduce fees for those applying for, renewing, or replacing their SmartPass.
- 1.4 Subject to the EQIA on the draft budget, the Minister intends to introduce an application fee for 60–64-year-olds and first-time Senior SmartPass applicants, in Autumn this year. At this stage, the Minister anticipates that the fee for 60–64-year-olds will be around £20, with a reduced fee of around £12 for Senior SmartPass applicants (those over 65). This will be a one-off fee for the lifetime of each SmartPass and it will not need to be paid each year. The Minister also intends to waive the fee completely for some groups, such as disabled people applying for a Half Fare SmartPass, those Registered Blind and War Disabled Pensioners.
- 1.5 This fee estimate is higher than the example provided in the public consultation document as it is based on the estimated costs of the Scheme for 2024/25 and has been adjusted to reflect the fact some groups will be exempt from the charge.
- 1.6 The Minister also intends to introduce renewal fees for Senior SmartPasses and replacement fees for all categories of pass, but these will only be introduced when the SmartPass application process moves online. Those who qualify for a SmartPass on the grounds of disability are likely to be exempt from the renewal fee. Other exemptions may also be considered following the outcome of the consultation on the Department's draft budget for 2024/25.

- 1.7 As a result of the financial pressures facing the Department, the Minister is not in a position to extend the half-fare concession to free travel, introduce companion travel, extend the eligibility criteria for those with disabilities, or provide free travel for asylum seekers this year, but will reconsider introduction of these options in the future if the financial position allows.
- 1.8 The Minister will however remove the three-month residency condition and extend the list of accepted documentation to prove residency to make the Scheme more accessible to those who are already eligible.
- 1.9 This draft Stage 6 Report identifies the equality impacts of introducing a SmartPass fee based on the Department's review of concessionary fares and the recent public consultation. **However, the Department is asking for further views in relation to the level of the fees proposed and the impact of these on Section 75 groups. Any comments can be provided through the consultation on the draft EQIA on the DfI Budget 2024/25, which can be accessed on the Department's website.**
- 1.10 Following the budget consultation, the Minister will consider this decision and if confirmed, officials will work with Translink to determine the exact fee each group will be required to pay and the timeframe for implementation.
- 1.11 While the Minister will continue to consider the EQIA findings when making his decision whether to introduce the fees and the level of the fee to be set, any new or revised policy to **implement** the decision will be separately subject to screening/EQIA (i.e. to consider the detail of how this will be implemented in practice). This will include the systems and processes that might be put in place regarding how people apply for, replace, or renew passes.
- .
- 1.12 The Minister would like to thank all those who took the time to respond to the consultation document, or to attend focus groups and other meetings with Departmental officials, to inform the Minister's initial decisions.

Summary of impacts

- 1.13 The Department's EQIA has highlighted that all the options have the potential to impact on equality of opportunity for Section 75 groups, to varying degrees. In general, options to reduce eligibility for the Scheme or reduce the scope of the Scheme could have foreseeable negative equality impacts, while options to increase eligibility for the Scheme or make it easier to access, could have foreseeable positive impacts. Those groups most likely to be affected by the options are older people, people with disabilities, those with dependents, and minority ethnic groups.
- 1.14 In summary, Options 1-4 of the consultation are likely to have foreseeable adverse impacts on some Section 75 groups, most notably some older people (within the 60-64 or 60-65 age group depending on the option selected), some people with disabilities and some people with dependents (who rely on relatives or friends for

help with caring responsibilities). Raising the age of eligibility for concessionary fares is likely to have the most adverse impact of any of the four options. Restricting use of the SmartPass to off peak travel or bus only travel is also likely to have an adverse impact on some older people and people with disabilities.

- 1.15 The introduction of a fee also has potential to negatively impact on some people within these groups, depending on the level at which the fee is set. It may put some people off applying for a SmartPass (if they do not feel it would be good value). There may also be implications for the Electoral Commission, as the SmartPass can be used as form of photo ID during elections.
- 1.16 The intersection of characteristics (such as gender, ethnicity, and socio-economic group) as well as other factors mean that, if implemented, Options 1-4 could have a disproportionate adverse impact on some people from within Section 75 groups, which may exacerbate existing, or create new inequalities. The consultation found, for example, that the adverse impacts may be greater for women than men, particularly those on low income.
- 1.17 Additionally, some people experience multiple adverse impacts and may be at more risk of substantive cumulative disadvantage than others.¹ These risk factors include people who already face barriers in using public transport (such as people with disabilities); those living in poverty; those who experience social exclusion or live alone; people who are reliant on public transport or do not own a car; or those on low income who provide unpaid care to family members or friends. So, for example, a disabled woman on low income with caring responsibilities and no car, may experience greater adverse impact (or cumulative disadvantage) as a result of some options than others, as a result of having a range of characteristics, or risk factors.
- 1.18 Impacts may also be different depending on where people live. More people in urban areas may be impacted by changes to the Scheme because uptake of concessionary passes is higher in urban areas compared with rural areas², possibly because public transport services are more frequent and convenient in urban areas, while those in rural areas may be *more severely affected* by the changes as they have fewer travel options and are usually further away from services and amenities.
- 1.19 Options 5-10 of the consultation are likely to have positive impacts on some Section 75 groups (most notably people with disabilities and people from minority ethnic groups, as well as those with dependents).

¹ Equality Commission (2023): Response to consultation: Department for Infrastructure - Free and discounted fares on public transport (concessionary fares)

² Based on DfI Management Information for 2018/2019: Translink, [NISRA CPD](#) and [2021 Mid-Year Estimates](#): there is a significant geographical split in percentage take up of Senior and 60+ SmartPasses across Local Government Districts (LGD) in Northern Ireland. DfI management information from 2018/2019 shows that predominantly eastern and urban areas of NI (including Belfast and Derry City and Strabane LGD) have higher levels of take up of concessionary passes. Central and western areas have lower levels, with Fermanagh & Omagh LGD and Mid-Ulster LGD showing the lowest take up rates.

- 1.20 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 and may be more reliant on public transport than other groups in society. Therefore, greater access to public transport has the potential 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.
- 1.21 The introduction of a companion pass and extending the eligibility criteria for the SmartPass also has the potential to make public transport more accessible for disabled people and their carers, providing greater freedom and promoting travel for those unable, or who struggle, to travel independently.
- 1.22 These goals closely align with the Department's duties to promote equality of opportunity and encourage participation by disabled people in public life³, as well as promoting the rights included the UN Convention on the Rights of Persons with Disabilities (UCRPD).
- 1.23 Similarly, asylum seekers and victims of human trafficking are one of the most vulnerable and socially excluded groups in our society, relying on very low levels of income and little family support. Providing free public transport to this group, as set out under Option 8, could help them access services (including ESOL), volunteer and integrate into their local communities. In turn, this can help reduce costs in other areas, including the cost of mental health support, promote social inclusion, and improve asylum seekers quality of life, allowing them to live independently and helping them realise their potential.
- 1.24 The equality impacts of the various options on the different Section 75 groups are explored in more detail in the section below.

Equality impacts by option

Option 1 – Raising age eligibility

- 1.25 The Department put forward three options:
- Option A – make **no change** to the Scheme, leaving the eligibility rules as they are now; or
 - 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**. The State Pension Age for men and women is currently 66 and will increase to 67 between 2026 and 2028. This

³ Section 49A of the Disability Discrimination Act 1995 (as amended by the Disability Discrimination (NI) Order 2006)

would apply to existing users as well as new applicants. However, for practical purposes those with a 65+ SmartPass would continue to be able to use it.

Potential Equality Impact	Yes (Adverse)
Equality Group:	Age, those with dependents, women
Reason	
<p>Raising the age of eligibility for concessionary fares has the potential to impact on some older people (those age 60-64 (in Option A) and those aged 60-65 (in Option B). This is because some people in these age groups may choose not to travel or travel less, because they will be required to pay a fare. If people reduce travel because they cannot afford to pay for public transport, it could impact on their ability to:</p> <ul style="list-style-type: none"> - work, volunteer, or provide unpaid care. - access services and amenities. - attend health or other appointments; or - meet friends and family. <p>This could, in turn, increase their social isolation.</p> <p>It could also impact on the amount of money they have to spend on other things which could lower their standard of living.</p> <p>Additionally, the proposals could also have an impact on those with multiple identities for example older people (60-64) with a disability (who do not qualify for a SmartPass on the grounds of disability).</p> <p>The impact of the proposals could be more severe for women, as women use transport differently than men, are more likely to have fewer travel options available to them and as a group, earn less than men throughout their lives. This may mean that, if the age of eligibility for concessionary fares increases, a greater proportion of women could be affected, or women could be more negatively affected than men.</p> <p>The proposals could also impact on those with dependents (for example, those people who rely on grandparents who travel by public transport to help with caring responsibilities).</p>	

Option 2 – Limiting SmartPass use to off-peak travel

1.26

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 will continue to be able to travel for free at other times, including at any time on Saturdays, Sundays, and Bank Holidays.

Potential Equality Impact	Yes (Adverse)
Equality Group:	Age, Disability, People with Dependents
<p>Reason: Limiting concessionary travel to off peak only could have an adverse impact on older people and disabled people who use the pass to travel to work or volunteer or who need to travel early to attend medical and other appointments.</p> <p>The option could also impact on those with dependents (for example, those people who rely on grandparents who travel by public transport, to help with caring responsibilities while they are at work).</p> <p>The option could have a more severe impact on people with disabilities because, as a group, people with disabilities tend to have higher living costs; high rates of economic inactivity and lower wages, than those without.</p>	

Option 3 – Limiting SmartPass use to bus travel only

1.27

This change would mean that a SmartPass could no longer be used to travel by rail. It would allow SmartPass users to travel on bus only.

Potential Equality Impact	Yes (Adverse)
Equality Group:	Age, Disability
<p>Reason: Limiting concessionary travel to bus travel only could have an adverse impact on older and disabled people who mainly use rail services because it is more convenient for them. Some respondents to the consultation view rail as being more convenient, quicker, and providing greater comfort than buses, particularly for long journeys. Some responses also highlighted that rail gives greater flexibility in terms of the timing of travel, especially for those living in rural areas.</p> <p>It also has the potential to reduce public transport accessibility for older people and people with disabilities who find some buses less accessible to use.</p> <p>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</p>	

wheelchairs cannot use the bus and those with guide dogs can find it challenging. As a result, rail travel is a much more accessible option for some disabled people.

Option 4 – Application, renewal, and replacement fees

1.28

This change would mean that SmartPass users would pay a fee for applications, renewal, 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. A replacement fee would be paid when a person applies to have a new card issued if their card has been lost or stolen. The consultation document set out that if a fee were to be introduced, it would be done on a cost recovery basis, that is, the Department would seek to introduce a fee that covers the cost of issuing a card and this was likely to be in the region of £5 - £10 for each card issued.

Potential Equality Impact	Yes (Neutral/Minor Adverse)
Equality Group:	Age, Disability
<p>Reason: The consultation highlighted that applying an application, renewal, or replacement fee (rather than an annual charge) is likely to have a low impact on most groups⁴, but could have an adverse impact on some people within groups, depending on the fee level set.</p> <p>While content to pay a fee, 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 as they have limited income and would find even a small fee unaffordable.</p> <p>Additionally, the Cost-of-Living Crisis has put increasing pressure on the household budgets of those on the lowest incomes resulting in a struggle to meet even the most basic household expenditure. Therefore, adding further costs to these households has the potential to increase financial hardship for these groups.</p> <p>Introducing a fee may therefore have the most negative impact on the people the Scheme was designed to help (those facing social</p>	

⁴ Of those respondents to the public consultation who provided a view on Option 4, a small majority (54%) were opposed to the introduction of a fee. However, a number of respondents qualified their opposition to the proposal by commenting that they would pay a small fee if this protected the Scheme. The introduction of a fee was seen by many as the least impactful of the proposals aimed at reducing costs presented in the consultation.

exclusion) and could result in poorer access to public transport and increased in social isolation amongst this group.

Conversely, charging a fee therefore has the potential to reduce the administration of a Scheme for everyone as it will discourage those who do not use the SmartPass from applying for it. 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.

It is also reasonable to assume that a fee higher than that set out as an estimate in the consultation document, may have a greater negative impact on some groups, particularly those in lower income groups or people less likely to be in employment such as people with disabilities and those 65 and over. The higher fee, now proposed, may also impact on more women than men and may discourage some groups applying for a SmartPass. Charging a fee may also have some unintended consequences – for example those who do not have a SmartPass and do not have any other form of identification, will need an Electoral Identity card to vote.

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

1.29

This change would mean that everyone who is currently eligible for a half fare concession would receive free travel. Free travel would be available on all services. This means that free travel (which is currently available on Glider) would apply to Metro, Ulsterbus, Goldline and NI Railways.

Potential Equality Impact	Yes (Positive)
Equality Group:	Disability
<p>Reason: Increasing the half fare concession to full fare for people with disabilities is likely to have a positive impact on people with disabilities.</p> <p>Providing free travel on public transport has the potential to increase disabled people's access to jobs and education, as well as training and volunteering opportunities. Additionally, free public transport has potential to promote disabled people's participation in local communities, enabling them to pay more visits to friends and family, reducing their social exclusion, promoting better health and wellbeing, and helping them live independently.</p> <p>Widening access to the Scheme is consistent with the rights set out in the United Nation Convention on the Rights of Persons with</p>	

Disabilities (UNCRC), including Article 9 which requires that people with disabilities have the right to access all aspects of society on an equal basis with others including the physical environment, transportation, information and communications, and other facilities and services provided to the public.

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

- 1.30 This change would mean that, if a person is disabled and they are unable to travel alone, they may be entitled to a companion pass. For the avoidance of doubt, companions are not themselves issued with a concessionary travel pass, nor are they able to travel for free unless accompanying a companion pass holder.

Potential Equality Impact	Yes (Positive)
Equality Group:	Disability, Age, People with Dependents
<p>Reason: Providing companion travel is likely to have a positive impact on people with disabilities, older people, and those with dependents. This is because disabled people (e.g. those with mobility issues or cognitive challenges) who need assistance to use public transport may be more likely to use public transport if they have a companion travelling with them.</p> <p>Giving people with disabilities more confidence and support to travel on public transport has the potential to increase their access to a range of opportunities and services, increase their participation in the local community and reduce social isolation. It would also reduce the cost of travel for carers meaning they would have more money to spend on other things. This is particularly important as taking on a caring role can result in a sharp reduction in household income, especially when the carer is forced to leave work, or reduce their hours to care for someone and many carers struggle to make ends meet.⁵</p>	

⁵The [State of Caring 2018](#) survey included over 6,800 respondents throughout the UK, eight per cent of whom came from Northern Ireland. It found that 37% are struggling to make ends meet, while a further 20% said they are in or have been in debt because of caring. See [Carers in Northern Ireland: Some key statistics - Research Matters](#) ([assemblyresearchmatters.org](#))

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

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

Potential Equality Impact	Yes (Positive)
Equality Group:	Disability
<p>Reason: Extending the qualifying criteria for a disabled persons SmartPass to bring it in line with other jurisdictions is likely to have a positive impact on people with disabilities as it would increase the number of people that could access and benefit from the Scheme. Increasing access to public transport for people with disabilities is particularly important because this group can experience high levels of social exclusion.</p> <p>Greater access to the Scheme also has the potential to promote the rights of disabled people as set out in the UN Convention on the Rights of Person with disabilities including Article 9 (accessibility)⁶, Article 19 (independent living)⁷ and Article 28 (adequate standard of living and social protection).⁸</p>	

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

- 1.32 This change would extend the Scheme to provide free transport to asylum seekers receiving asylum support and to victims of human trafficking. Under this new arrangement, all asylum seekers (including those aged between 5-18⁹) receiving such support would be eligible for a SmartPass.

Potential Equality Impact	Yes (Positive)
Equality Group:	Race
<p>Reason: In general, asylum seekers are not permitted to work – this means they have no means to increase their income and are reliant on asylum support, making the cost of public transport is prohibitive. Additionally, while asylum seekers were previously accommodated almost exclusively in Belfast, this practice has now changed, and a</p>	

⁶ [Article 9 - Accessibility | Division for Inclusive Social Development \(DISD\) \(un.org\)](#)

⁷ [Article 19 – Living independently and being included in the community | United Nations Enable](#)

⁸ [Article 28 – Adequate standard of living and social protection | United Nations Enable](#)

⁹ There is a disparity between who is considered a child in Immigration Rules and Translink policy. Those between the ages of 16-18, including those who have arrived with their families and therefore 'dependents and unaccompanied children, are classed as children until the age of 18 for the purposes of asylum law.

quarter of the asylum seeker population now live outside the city. This makes it very difficult for asylum seekers to access specialist asylum support services, which are often located in Belfast. Providing free travel for asylum seekers and victims of human trafficking can enable these groups to:

- access services and amenities.
- attend English classes and volunteer.
- visit family and friends.
- collect their children from school
- participate in the local community (increasing their sense of well-being and potentially promoting good health outcomes.

Therefore, including asylum seekers in the Concessionary Fares Scheme is also likely to have a positive impact on this group by helping reduce social exclusion and improving integration, a key government objective. as set out in the Executive Office draft Refugee Integration Strategy.¹⁰

Option 9 - Changes to the residence test

- 1.33 This change would remove the need for applicants to be permanently resident in Northern Ireland for a period of three months and replace it with the 'primary residence' test. Applicants would be asked to sign a declaration that Northern Ireland is their primary residence.

Potential Equality Impact	Yes (Positive, Minor)
Equality Group:	Race, Age, Disability
Reason: Making changes to the residence test wouldn't change eligibility under the Scheme but it would make it easier for older and disabled asylum seekers and other groups who intend to reside in Northern Ireland to access the Scheme. This is particularly important as older and disabled asylum seekers are more likely to have mobility issues and therefore be at higher risk of social exclusion than younger people and those who do not have a disability.	

¹⁰ [Draft Refugee Integration Strategy | The Executive Office \(executiveoffice-ni.gov.uk\)](#)

Option 10 - Proving residency

1.34

This change would extend the list of documentation that can be used to prove residency. The list would be reviewed to ensure that it is open to everyone on an equal basis.

Potential Equality Impact	Yes (Positive, Minor)
Equality Group:	Race, Age, Disability
Reason: Making changes to the proofs that are acceptable under the Scheme wouldn't change the rules on eligibility, but it would make it easier for some groups of people to apply such as Travellers, asylum seekers and homeless people. This is due to some groups finding it difficult to prove they are eligible for the Scheme, as the list of proofs currently accepted is quite restrictive when compared to other jurisdictions. Increasing access to public transport for groups of people such as asylum seekers, Travellers and homeless people is particularly important because these groups can experience high levels of social exclusion.	

2 Background

The Scheme

- 2.1 The Scheme is provided for under Article 5 of the Transport (Northern Ireland) Order 1977. The Scheme currently provides full fare discounts on public transport, via use of a SmartPass, for eligible applicants over 60 years of age; those who are registered blind; and those in receipt of a war disablement pension.
- 2.2 The Scheme also provides half fare discounts to several other groups: eligible applicants registered as partially sighted; those registered with a learning disability; those who have had a driving licence refused or revoked on medical grounds; and those receiving the Mobility Component of Disability Living Allowance (DLA) or Personal Independence Payments (PIP). Applicants must be resident in Northern Ireland for a minimum of three months to be eligible. Children aged 5-16 also get a half fare concession under the Scheme (children under five already receive free travel without reimbursement).
- 2.3 When the Scheme was first introduced free travel was made available for those registered as blind while half fare travel was introduced for senior citizens aged 65 and over; people in receipt of a regular war disablement pension; and children between the ages of 6 and 16.¹¹
- 2.4 In 1995 the Government of the Republic of Ireland introduced free cross-border travel for those eligible for concessionary fares resident anywhere on the island of Ireland. It should be noted that this concession was paid for by the Government of the Republic of Ireland and did not form part of the Northern Ireland Scheme. Free travel for senior citizens was introduced in October 2001. Shortly thereafter, in May 2002, free travel was also extended to war disabled pensioners.
- 2.5 In April 2004 the Scheme was again extended, this time with the introduction of a half-fare concession for four new categories of people with disabilities (those registered as partially sighted; refused a driving licence on medical grounds; known to have a learning disability; and in receipt of either mobility component of Disability Living Allowance).
- 2.6 Following agreement with the Government of the Republic of Ireland, the All-Ireland Free Travel Scheme for Older People was introduced in April 2007 although again this was complementary to, rather than part of, the Scheme itself. The extension of the scheme to those aged 60-64 followed a 2007 policy review that considered the potential costs and benefits of including/excluding a number of groups based on the perceived risk of social exclusion.

Policy Aim

- 2.7 The stated aim of the Scheme is to:

¹¹ Children aged five and under go free, although this concession is provided by transport operators rather than as part of the Scheme

‘To promote social inclusion by improving public transport accessibility through free and concessionary fares for members of the community who are most vulnerable, or liable to social exclusion.’¹²

- 2.8 This aim was developed based on the priorities and principles contained in the 2001 Regional Development Strategy¹³ and 2002 Regional Transport Strategy¹⁴.

Strategic priorities of the Government in Northern Ireland

- 2.9 While the provision of free and discounted travel, as part of the Scheme, was originally designed to promote its use among those who are most vulnerable to social exclusion, concessionary travel has the potential to contribute towards wider Executive and departmental strategies and policies to reduce inequalities, support poverty reduction, improve public health, encourage sustainable transport behaviours, and stimulate economic growth.
- 2.10 Encouraging greater use of public transport is central to the Department’s wider policy objective to promote a modal shift away from private car to more sustainable transport options. These environmental benefits directly align with the Department’s commitment to promoting sustainable transport choices, and the actions being developed as part of the new Climate Action Plan, to contribute to the Executive’s net zero commitment under the Climate Change Act (Northern Ireland) 2022.
- 2.11 Free and discounted public transport also acts as an important poverty reduction measure for those on low income, who are already facing steep cost of living increases, as they are the most likely to use public transport services. In this way, the Scheme has the potential to contribute to outcomes being developed as part of the NI Executive’s Anti-Poverty Strategy, as well as promoting green economic growth by improving access to jobs and training opportunities for those on low incomes, in line with the Executive’s Investment Strategy.¹⁵
- 2.12 Reducing social exclusion for S75 groups, by promoting access to public transport, can also help the Department promote equality of opportunity and contribute to equality strategies and action plans, as well as comply with its duties under human rights legislation, in particular its duty to promote, protect and advance the rights of disabled people, as set out in the UN Convention on the Rights of Persons with Disabilities (UNCRPD).

¹² Concessionary fares policy, in Northern Ireland as elsewhere, developed incrementally and the Scheme began without a specified aim or rationale, beyond the generally held public perception that children and senior citizens should be entitled to preferential rates on some goods and services, including public transport. In 2004 the Scheme was subject to an Equality Impact Assessment (EQIA), under the requirements of Section 75 of the Northern Ireland Act 1998. During consultation, the lack of a clearly stated aim was highlighted. The final report on the EQIA therefore included the adoption of the aim. (See: Department for Regional Development (2007): [Policy-review-of-concessionary-fares.pdf](#))

¹³ Department for Infrastructure (2001): Shaping our Future - [Regional Development Strategy for Northern Ireland 2025](#)

¹⁴ Department for Regional Development (2002): [Regional Transportation Strategy for Northern Ireland 2002-2012](#)

¹⁵ [Investment Strategy for Northern Ireland \(ISNI\) | Northern Ireland Executive](#)

3 Data collection and consultation

The public consultation and draft EQIA

- 3.1 The Department has taken forward significant work at each stage of the policy development process to understand the equality impacts of making changes to the Concessionary Fares Scheme.
- 3.2 In developing the draft EQIA for the 10 options set out in the public consultation, the Department considered a range of qualitative and quantitative research, as well as issues raised at pre-consultation engagement meetings with stakeholders including Equality Commission for Northern Ireland (ECNI), Inclusive Mobility and Advisory Committee (IMTAC), the Commissioner for Older people (COPNI), the Women's Resource and Development Agency (WRDA), Age (NI), the Law Centre, Flourish (a group working with victims of Human Trafficking) and Consumer Council (NI). A draft EQIA was published alongside the consultation document.
- 3.3 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 and via post.
- 3.4 The consultation team worked closely with stakeholders to ensure the consultation was as accessible as possible to individuals who fell within S75 groups.
- 3.5 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.
- 3.6 An Interactive Easy Read 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) versions of the consultation, with voice over and subtitles, also featured on the consultation page of the Department's website.
- 3.7 In total, the consultation received 20,138 responses from various sources, all of which have been analysed. 63% of the responses to this consultation took the form of petitions or campaign responses.
- 3.8 The remaining 37% of responses were substantive responses from individuals and organisations (submitted via a survey on Citizen Space, Easy Read, email, and post).
- 3.9 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.

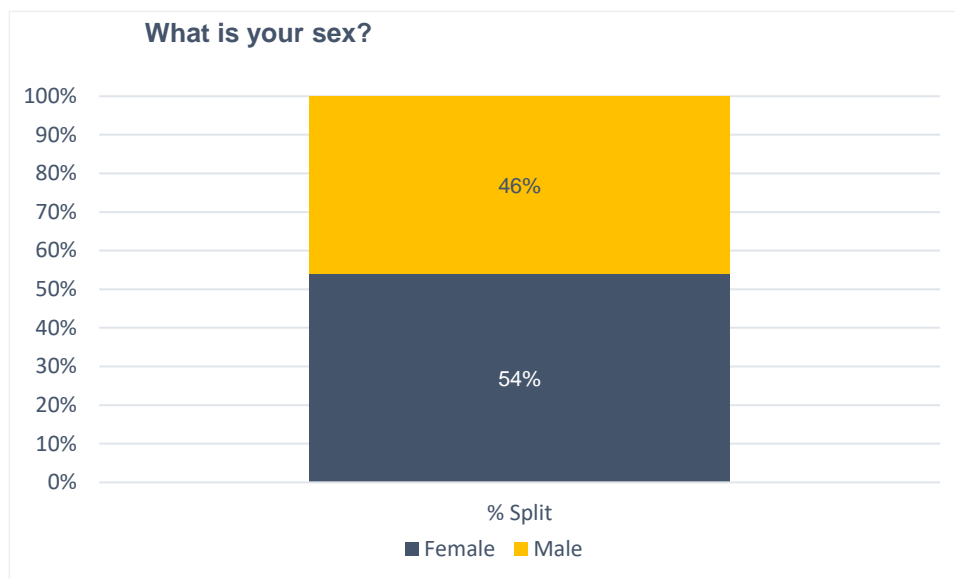
S75 profile of survey respondents

3.10 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. The Department was particularly interested in the responses of Section 75 respondents who could be negatively affected by changes to the current Scheme.

3.11 Therefore, the final part of the consultation survey included a series of questions aimed at recognising three S75 categories – sex, age, and disability.¹⁶

Sex

3.12 Respondents to the consultation were asked to confirm their sex. Of the respondents who answered this question (n=6167), 54% were female and 46% were male.



Age

3.13 Respondents to the consultation were asked to confirm which age band they fell into. Of the respondents who answered Question 35 (n=6186):

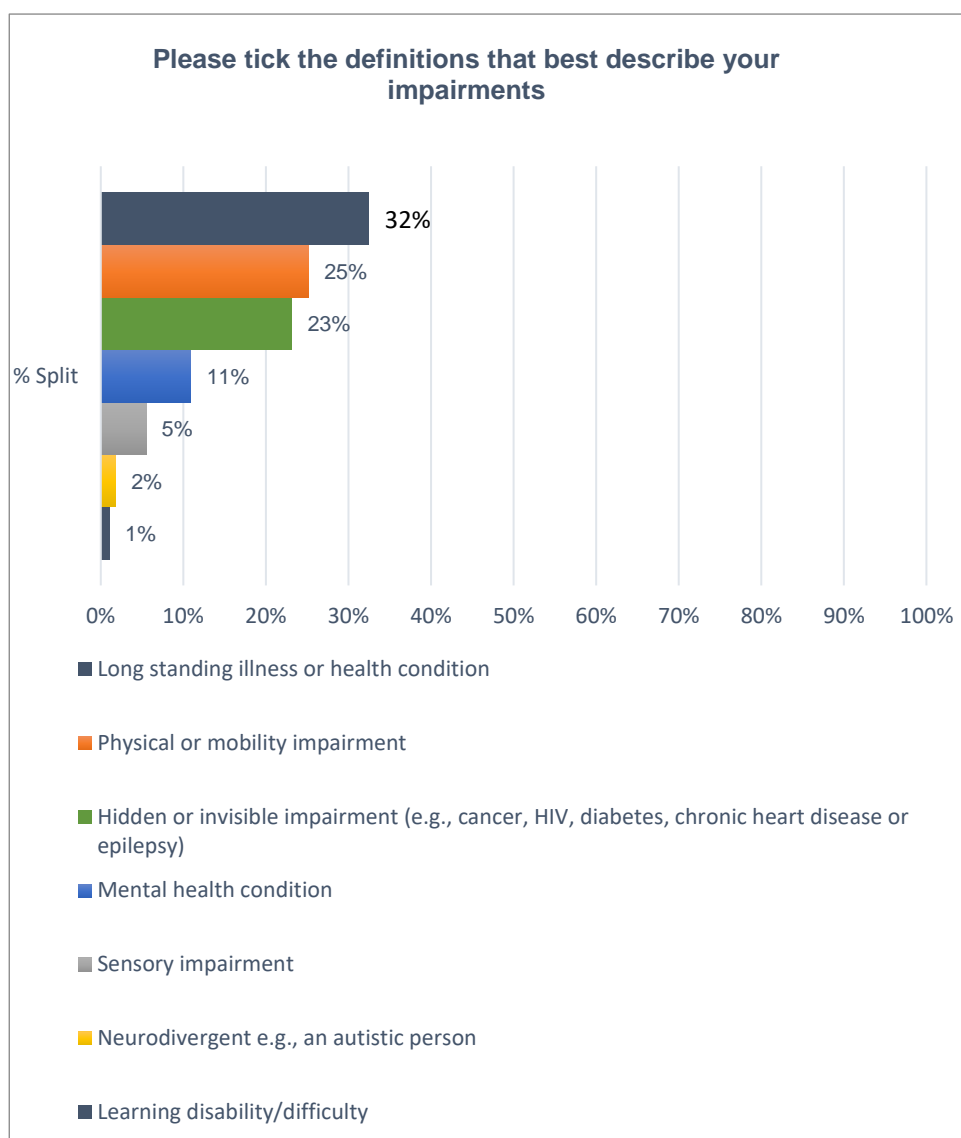
- 2% were 80+ years of age.
- 14% were 70-79 years of age.
- 56% were 60-69 years old.
- 19% were 50-59 years old.

¹⁶ It is important to note that individuals were not obligated to respond to all the questions posed in the 'About You' section and respondents could remain anonymous if they wished.

- 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.

Disability

- 3.14 Respondents to the consultation 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.
- 3.15 Respondents were then asked (if they had answered yes to the previous question) to tick the definitions that best described their impairments. 2155 respondents answered this question (Question 38), however, as individuals were encouraged to tick all definitions that applied, some may have selected more than one answer.
- 3.16 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.



Structured engagement

- 3.17 As part of a programme of planned consultation, in addition to the consultation survey, the Department 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.
- 3.18 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.¹⁷
- 3.19 Face to face focus groups were held for participants from the following groups:
- Older Persons Consultative Forum (20th June 2023)

¹⁷ 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.

- 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)

3.20 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)

3.21 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)
- Fermanagh and Omagh District Council (29th February 2023)
- Armagh, Banbridge and Craigavon District Council (3rd July)
- Causeway Coast and Glens District Council (5th July 2023)
- North Down and Ards (25th July 2023)
- Mid Ulster (15th June 2023)

4 Key Findings (updated)

- 4.1 The following section updates the impacts identified in the draft EQIA with information gathered as part of the public consultation process. A detailed assessment of the impact of the proposals on each equality group is set out below:

Religious belief

- 4.2 Census data¹⁸ showed that, in 2021, the main current religions in Northern Ireland were: Catholic (42.3%); Presbyterian (16.6%); Church of Ireland (11.5%); Methodist (2.3%); Other Christian denominations (6.9%); and Other religions (1.3%).
- 4.3 Data is not held on the religious belief of Scheme users and there is no evidence that there will be any differential impacts from the policy based on religious belief. Additionally, engagement with stakeholders to date has not identified any negative impacts for this S75 group.
- 4.4 It is highly unlikely that the proposals will have a differential impact based on religious belief. As part of the formal consultation process, the Department consulted with a range of stakeholders and the general public to identify any potential equality impacts in relation to each of the Section 75 groups. No further impacts were identified during the formal consultation exercise.

National Identity (as a proxy for political opinion)

- 4.5 In Census 2021¹⁹, 814,600 people (42.8%) living in Northern Ireland identified solely or along with other national identities as 'British'. This is down from 876,600 people (48.4%) in 2011.
- 4.6 The 2021 Census²⁰ also found, 634,600 people (33.3%) living here identified solely or along with other national identities as 'Irish'. This is up from 513,400 people (28.4%) in 2011.
- 4.7 In Census 2021²¹, 598,800 people (31.5%) living here identified solely or along with other national identities as 'Northern Irish'. This is up from 533,100 people (29.4%) in 2011.
- 4.8 Data is not held on the national identity/political opinion of Scheme users and there is no evidence that there will be any differential impacts from the policy based on

¹⁸ [Census 2021 Main statistics for Northern Ireland - Statistical bulletin - Religion \(nisra.gov.uk\)](https://www.nisra.gov.uk/system/files/statistics/census-2021-main-statistics-for-northern-ireland-phase-1-statistical-bulletin-national-identity.pdf) (page 2)

¹⁹ <https://www.nisra.gov.uk/system/files/statistics/census-2021-main-statistics-for-northern-ireland-phase-1-statistical-bulletin-national-identity.pdf> (page 2)

²⁰ Ibid - <https://www.nisra.gov.uk/system/files/statistics/census-2021-main-statistics-for-northern-ireland-phase-1-statistical-bulletin-national-identity.pdf> (page 2)

²¹ Ibid - <https://www.nisra.gov.uk/system/files/statistics/census-2021-main-statistics-for-northern-ireland-phase-1-statistical-bulletin-national-identity.pdf> (page 2)

national identity/political opinion. Additionally, engagement with stakeholders to date has not identified any negative impacts for this S75 group.

- 4.9 It is highly unlikely that the proposals will have a differential impact based on political opinion.
- 4.10 As part of the formal consultation process, the Department consulted with a range of stakeholders and the general public to identify any potential equality impacts in relation to each of the Section 75 groups. No further impacts were identified during the formal consultation exercise.

Racial Group

- 4.11 According to the Census 2021²², 3.4% (65,600) of Northern Ireland's population (1,903,175) comes from a minority ethnic background. The number of people living in Northern Ireland who were born outside the United Kingdom and Ireland has grown from 81,500 people (4.5%) in 2011 to 124,300 people (6.5%) in 2021.²³ In 2021 there were 92,500 people resident in Northern Ireland (or 4.9% of our population) who held a non-UK/Ireland passport only.
- 4.12 Additionally, Census 2021 data on main language, passports and national identity all point to an increasingly diverse population.²⁴
- 4.13 Data is not currently held on concessionary fare use by ethnicity, country of birth or passport held. However, early engagement on the proposals with those working with minority ethnic groups has highlighted that asylum seekers, (who are likely to be from a minority ethnic group), are at greater risk of social exclusion within society²⁵ and would significantly benefit from measures to improve the accessibility and affordability of public transport.
- 4.14 In relation to impacts of the proposals, a review of concessionary fare schemes in other jurisdictions also highlighted that the range of proofs acceptable in NI to gain access to the Scheme, are more restrictive than in other nations and that a more flexible approach to providing evidence of eligibility may benefit some minority ethnic groups.

- **Free transport for asylum seekers and victims of human trafficking**

²² <https://www.nisra.gov.uk/system/files/statistics/census-2021-main-statistics-for-northern-ireland-phase-1-statistical-bulletin-ethnic-group.pdf> (page 2)

²³ <https://www.nisra.gov.uk/system/files/statistics/census-2021-main-statistics-for-northern-ireland-phase-1-statistical-bulletin-country-of-birth.pdf>

²⁴ For example, Census 2021 shows that in 2021 there were 92,500 residents in Northern Ireland (or 4.9% of our population) who held a non-UK/Ireland passport only. See: Census 2021 Main statistics for Northern Ireland - Statistical bulletin - Passports held (nisra.gov.uk) [Census 2021 Main statistics for Northern Ireland - Statistical bulletin - Passports held \(nisra.gov.uk\)](https://www.nisra.gov.uk/system/files/statistics/census-2021-main-statistics-for-northern-ireland-phase-1-statistical-bulletin-passports-held.pdf)

²⁵ See for example: Murphy, F. and Vieten, U.M. (2017): Asylum Seekers and Refugees experiences of life in Northern Ireland - [Media,784971,en.pdf \(qub.ac.uk\)](https://www.qub.ac.uk/media/784971/en.pdf)

- **Changes to the residence test**
- **Proving residency**

- 4.15 In its response to the consultation, the Law Centre reiterated the barriers faced by asylum seekers in accessing public transport. The Law Centre noted that, in general, asylum seekers are not permitted to work and so have no means to increase their income. Given the extremely low rate of asylum support, the cost of public transport is therefore prohibitive.²⁶
- 4.16 The Law Centre also noted that, while asylum seekers were previously accommodated almost exclusively in Belfast, this practice has now changed meaning that many more asylum seekers now live outside the city. This make it very difficult for asylum seekers to access specialist services which tend to be in Belfast.²⁷ Therefore, access to free transport would be particularly beneficial for those living outside of Belfast or in rural areas.
- 4.17 Responses to the consultation, also highlighted that the current requirement for a counter-signatory who has known the applicant for two or more years disproportionately affects migrants and may give rise to indirect discrimination on grounds of race. The Law Centre recommended that this requirement is removed and replaced by a counter signatory who has ‘known the applicant personally’, therefore making it easier for those who have recently arrived in the country and eligible for the Scheme to join.²⁸
- 4.18 Additionally, the removal of the three-month residency requirement may have a positive impact on asylum seekers and victims of human trafficking, as it may make it easier for them to access the Scheme when they first arrive in the country.
- 4.19 During consultation, stakeholders drew comparisons with GP registrations where a person must be ‘ordinarily resident’ to register with a GP practice. Under this, 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. Applicants are required to show an ‘identifiable and settled purpose’ such as retirement, joining a family member, taking up employment, etc. It was recommended that the Department adopts a similar approach and requires applicants to demonstrate a reason for living in Northern Ireland for the foreseeable future to remove inequalities associated with the application process.
- 4.20 Engagement with organisations such as Flourish also highlighted that providing free public transport to victims of human trafficking has the potential to reduce or remove the barriers that victims of human trafficking groups may face when

²⁶ Law Centre (2023): Concessionary Fares Scheme: consultation response

²⁷ Law Centre (2023): Concessionary Fares Scheme: consultation response

²⁸ Law Centre (2023): Concessionary Fares Scheme: consultation response

accessing key services and amenities, volunteering or visiting friends²⁹ including services designed to aid their recovery. Greater participation in the community and interaction with the local community also has important health and well-being benefits for this group.

- **Application, renewal, and replacement fee**

- 4.21 The financial impact on certain groups of society was also recognised by those supportive of introducing a fee. While some were content to pay a fee, a number of respondents suggested an exemption for some groups. For example, 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.

Age³⁰

- 4.22 The population on census day, 21 March 2021, was 1,903,100 – the highest ever recorded. The table and graph below, taken from the Census 2021³¹, shows the Northern Ireland population by age bands.

Age band	2021 Census population	Percentage of population
0-14	365,200	19%
15-64	1,211,400	64%
15-39	594,300	31%
40-64	617,100	32%
65+	326,500	17%
65-84	287,200	15%
85+	39,400	2%
All Ages	1,903,100	100%

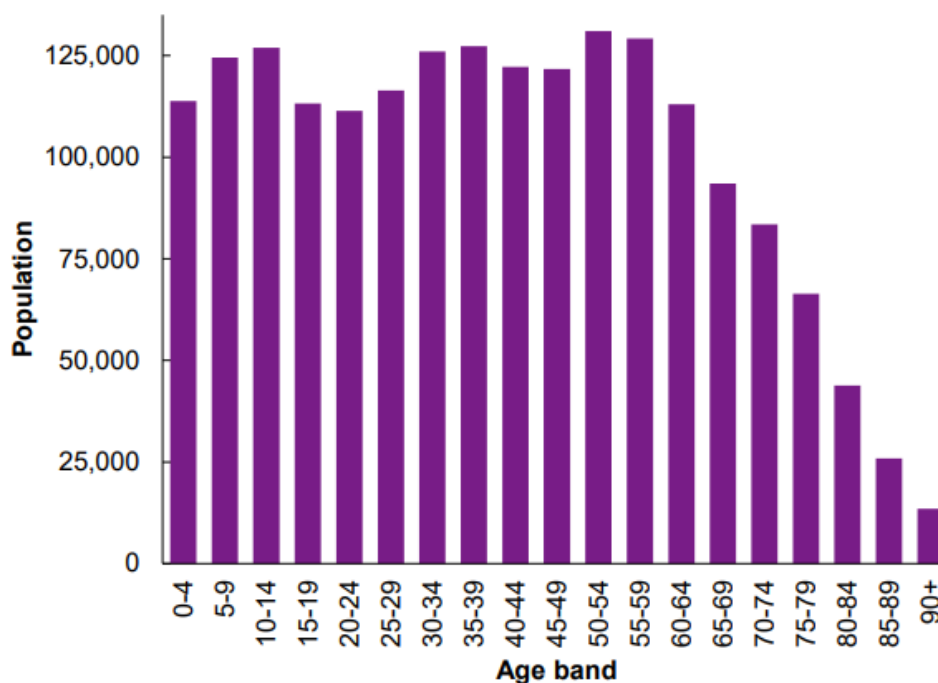
Note: Figures may not sum due to rounding

²⁹ These barriers were highlighted through meetings between DfI and groups representing and working with asylum seekers.

³⁰ Mid-Year Estimates provided for key points

³¹ See: [Census 2021 population and household estimates for Northern Ireland: Statistical bulletin \(nisra.gov.uk\)](https://www.nisra.gov.uk/census-2021-population-and-household-estimates-for-northern-ireland-statistical-bulletin)

Figure 1: Census 2021 population by five year age band



- 4.23 The corresponding graph (which provides more disaggregated analysis) shows that the age bands 50 to 54 and 55 to 59 are the most populous, each at around 130,000 people.³²
- 4.24 Based on the 2021 Census³³, since 2011, population increase was greatest in the older age groups. The number of people aged 65 or more rose by over 60,000, to nearly one third of a million people in Census 2021. This is a near 25% increase on 2011 and demonstrates the scale of population change due to ageing.³⁴
- 4.25 According to the 2021 Census, the share of the Northern Ireland population represented by people aged 65 years and over stood at 17.2 per cent in 2021.³⁵
- 4.26 By 2030, NISRA population projections show that there is projected to be 125,598 people aged 60 to 64 in Northern Ireland and 400,894 of the population are expected to be aged 65 and over.³⁶

- **Raising Age eligibility**

³² See: [Census 2021 population and household estimates for Northern Ireland: Statistical bulletin \(nisra.gov.uk\)](https://www.nisra.gov.uk/publications/census-2021-population-and-household-estimates-for-northern-ireland-statistical-bulletin)

³³ Ibid: [Census 2021 population and household estimates for Northern Ireland: Statistical bulletin \(nisra.gov.uk\)](https://www.nisra.gov.uk/publications/census-2021-population-and-household-estimates-for-northern-ireland-statistical-bulletin)

³⁴ [Census 2021 Main Statistics for Northern Ireland Phase 1 press release \(nisra.gov.uk\)](https://www.nisra.gov.uk/publications/census-2021-main-statistics-for-northern-ireland-phase-1-press-release)

³⁵ Ibid - [Census 2021 Main Statistics for Northern Ireland Phase 1 press release \(nisra.gov.uk\)](https://www.nisra.gov.uk/publications/census-2021-main-statistics-for-northern-ireland-phase-1-press-release)

³⁶ Based on midyear population estimates - <https://www.nisra.gov.uk/publications/2020-based-interim-population-projections-northern-ireland>

- 4.27 The principal group to benefit from concessionary fares, in terms of usage of the Scheme, is senior citizens aged 65 and over, followed by those aged 60-64.
- 4.28 In response to the consultation, Age NI's Lived Experience Survey 2023 highlighted that just under three quarters (74%) of those who answered the question felt support with transport and travel is "Absolutely Essential" while a further 20% felt that support with transport and travel is "Very Important".³⁷
- 4.29 Given the importance attached to free travel by some older people, removing free travel from the 60-64 age group and/or increasing the eligibility based on age to State Pension Age could have a negative impact on some older people, particularly those on low income or those living in social isolation, who are reliant on public transport to get around, increasing their risk of social exclusion.³⁸
- 4.30 However, those aged 60-64 may be less likely than people aged 65 and over, to face social exclusion. This is because they are more likely to be active and mobile than those in the 65 and over age group.³⁹
- 4.31 Labour Force Survey (LFS) statistics also show that, as expected, the 60-64 age group are more likely to be in employment than those people in the 65 and over age group. According to the LFS Survey⁴⁰ in 2022, overall employment rates were 52.7% for 60–64-year-olds, compared with 24.9% for 65–69-year-olds and 8.5% for 70–74-year-olds.
- 4.32 Employment rates are, however, different for different equality groups within these cohorts. For example, in 2022, employment rates for females aged 60-64 were 44.1% compared to 61.5% for males of the same age.⁴¹
- 4.33 The 2022 Labour Force Survey summary report⁴² highlighted that older women are also more likely to leave employment earlier than men, with females tending to leave between 63 to 64 and males between the ages of 65 to 66.⁴³
- 4.34 Employment rates are also much lower for people who have a disability, compared with those who do not. Only 25.9% of people with a disability in the 60-64 age group were employed, compared to 67.7% of those without a disability.⁴⁴
- 4.35 While those in the 60-64 age group are more likely to be employed than the 65 and over age group, stakeholders⁴⁵ representing older people have highlighted that

³⁷ Age (NI): August 2023 - Travel pass...essential lifeline Consultation response to Department of Infrastructure

³⁸ Forty-four percent of respondents to question 3 in the public consultation indicated that if they had an age-related SmartPass but in the future were not allowed to use it, they would not make their journey

³⁹ The prevalence of long-term conditions varies with age.- for further information see Census 2021: [Census 2021 Main statistics for Northern Ireland - Statistical bulletin - Health \(nisra.gov.uk\)](https://www.nisra.gov.uk/system/files/statistics/TbILFS2199.XLSX)

⁴⁰ Analysis of Labour Force Survey data <https://www.nisra.gov.uk/system/files/statistics/TbILFS2199.XLSX>.

⁴¹ Ibid – <https://www.nisra.gov.uk/system/files/statistics/TbILFS2199.XLSX>.

⁴² 2022 Labour Force Survey annual summary - see <https://www.nisra.gov.uk/system/files/statistics/TbILFS2199.XLSX>

⁴³ Analysis of Labour Force Survey data <https://www.nisra.gov.uk/system/files/statistics/TbILFS2199.XLSX>.

⁴⁴ Analysis of Labour Force Survey data <https://www.nisra.gov.uk/system/files/statistics/TbILFS2199.XLSX>.

⁴⁵ E.g., Age NI and COPNI (Pre-engagement consultation)

raising the age eligibility for concessionary fares could have a negative impact on some people *within* the 60-64 group, (particularly those on low income, who do not have access to a car or other means of transport, or who are socially isolated).⁴⁶

- 4.36 Stakeholders⁴⁷ have also highlighted that removal of the SmartPass from the 60–64-year-old age group and raising the age of eligibility for the concessionary pass could also have some unintended negative consequences on other Section 75 groups. For example, removal of the pass from carers within this age group, or from people with a disability or with mobility issues (who are not entitled to a disabled person’s SmartPass) could make it more difficult for these people to use public transport.
- 4.37 The Community Transport Association has also highlighted that any changes to the Scheme (if implemented on community transport services) could have a negative impact on rural users. Echoing comments made by Age NI, the CTA commented that *“community transport ensures that those living with poor transport networks can access appointments and services which they would not otherwise be able to do. The cumulative impact of reduced access to transport will have a multiplier effect, causing indirect adverse impacts across a wide range of areas of older people’s lives”*.⁴⁸
- 4.38 The group went on to state that *“there will also be an impact on the local economy, especially when considering dial-a-lift journeys are undertaken to rural towns and villages, which have by their nature a lower footfall than more urban areas”*.⁴⁹
- 4.39 Other stakeholders opposed to changing the age of eligibility, such as the Commissioner for Older People,⁵⁰ 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 viewed as far outweighing the costs of delivering the Scheme.
- 4.40 In its response, Greater Belfast Senior’s Forum also highlighted that removing the SmartPass will have a knock-on impact on the local economy, reducing the amount of money spent in local cafes and shops.⁵¹
- 4.41 Additionally, in 2019/2020, a report by the Department for Communities highlighted that 29% of those age 55-64 volunteered⁵². Stakeholders, such as Unison, highlighted the vital role that volunteers play in supporting the community and voluntary sector, while others may end up out of pocket as a result of donating their time, knowledge, and skills to benefit others.

⁴⁶ Research in GB found that bus passes are often mainly taken up by those on low incomes, access to a car, rather than income, is found to be the critical factor in determining take-up.

⁴⁷ E.g., Age NI and COPNI (Pre-engagement consultation)

⁴⁸ Community Transport Association (DFI’s Consultation on changes to the Concessionary Fares Scheme) August 2023

⁴⁹ Ibid

⁵⁰ COPNI (3rd July): Consultation on changes to the Concessionary Fares Scheme

⁵¹ Greater Belfast Seniors Forum (2023): Response to the NI Concessionary Fares Scheme

⁵² Department for Communities (2020): [Experience of volunteering by adults in Northern Ireland 2019/20](#)

4.42 Alternatively, it could be argued that the proposal to increase the age of eligibility for concessionary fares helps address the increase in average cohort life expectancy projections. In this way it supports intergenerational fairness and helps make the Scheme more sustainable for the future. This would ensure we continue to share the extra cost of rising longevity fairly between those contributing to, and those receiving, concessionary travel.

- **Limiting SmartPass use to off-peak travel only and/or Limiting SmartPass use to bus only travel**

4.43 Some respondents to the survey highlighted that rail was more convenient, quicker, and providing greater comfort than buses particularly for long journeys.

4.44 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. Limiting use of the SmartPass to bus only could result in crowding on buses.

4.45 In its response to the consultation, the Unison Retired Members Forum, stressed that *“restrictions and cuts to the SmartPass will put older people and people living with disabilities at higher risk of physical and mental health issues due to social isolation”*.⁵³

4.46 The restriction of concessionary travel to off-peak may also increase the barriers to travel for older people who need to travel at peak times, for example, to attend work. This may have a particular impact on some older people on low incomes, who cannot afford to retire early, particularly those who live in rural areas, where transport costs are usually higher.

4.47 A removal of peak travel may also disadvantage those older people who travel for caring responsibilities or to early morning medical appointments. Again, the impact is likely to be more severe for those on low incomes who have no access to alternative means of travel.

4.48 Additionally, removal of the rail concession may impact on older SmartPass users who live in areas with better rail links (and therefore who use trains more often than bus), or those with mobility issues who use rail services because they are more accessible.

- **Application, renewal, and replacement fee**

4.49 The introduction of an application, renewal or replacement fee may impact on older people on low incomes, particularly given the current cost of living crisis. Many respondents felt that introducing a fee would impact most on the people the

⁵³ Unison Members Forum: response to the Concessionary Fares Consultation

Scheme was designed to help and would result in increased in social isolation amongst this group.

- **Companion passes for disabled people unable to travel alone**

4.50 Introducing free travel for companions can help address some of the issues faced by older people with a disability and help remove barriers to using public transport, as well as providing older carers with help with financial costs. Research⁵⁴ has shown that 37% of carers are struggling to make ends meet, while a further 20% said they are in or have been in debt because of caring, making help with financial costs particularly important.

- **Changes to the residence test and/or Proving residency**

4.51 Introducing changes to the residence test can make it easier for older people who intend to live permanently in Northern Ireland access the Scheme such as foreign nationals.

4.52 Widening the list of accepted proofs of residence would simplify the application process, remove any barriers, and make the Scheme more accessible to all. This could support older asylum seekers and homeless people with no fixed abode or permanent address who are already eligible for concessionary travel to access the Scheme.

Marital status

4.53 There were 693,000 adults who were married or in a civil partnership in Census 2021. This made up 46% of our population aged 16 and over. In contrast 577,000 adults (38%) were single (never married/civil partnered).⁵⁵

4.54 Data is not held on the marital status of Scheme users and there is no evidence that there will be any differential impacts from the policy based on marital status. Additionally, engagement with stakeholders to date has not flagged up any negative impacts for this S75 group.

4.55 It is highly unlikely that the proposals will have a differential impact based on marital status. As part of the formal consultation process, the Department consulted with a range of stakeholders and the public to identify any potential equality impacts in relation to each of the Section 75 groups. No further impacts were identified during the formal consultation however, this will be monitored as part of the ongoing policy development process.

⁵⁴ The State of Caring 2018 survey included over 6,800 respondents throughout the UK, eight per cent of whom came from Northern Ireland. For further information see: [state-of-caring-report-2018.pdf \(carersuk.org\)](https://www.carersuk.org/state-of-caring-report-2018.pdf)

⁵⁵ <https://www.nisra.gov.uk/statistics/2021-census/results> or use this link: - Census 2021 Main statistics for Northern Ireland - Statistical bulletin - Marital or civil partnership status & Household relationships (couples) (nisra.gov.uk)

Sexual Orientation

- 4.56 According to the 2021 Census, a total of 31,600 people aged 16 and over (or 2.1%) identified as LGB+ ('lesbian, gay, bisexual or other sexual orientation'), 1.364 million people (90.0%) identified as 'straight or heterosexual' and 119,000 people (7.9%) either did not answer the question or ticked 'prefer not to say'.⁵⁶
- 4.57 Data is not held on the sexual orientation of Scheme users and there is no evidence that there will be any differential impacts from the policy based on sexual orientation. Additionally, engagement with stakeholders to date has not flagged up any negative impacts for this S75 group.
- 4.58 It is highly unlikely that the proposals will have a differential impact based on sexual orientation. As part of the formal consultation process, the Department consulted with a range of stakeholders and the public to identify any potential equality impacts in relation to each of the Section 75 groups. No further impacts were identified during the formal consultation however, this will be monitored as part of the ongoing policy development process.

Men and Women

- 4.59 According to the NI Census, 2021, there are 967,047 females in Northern Ireland, equating to 51% of the population in Northern Ireland, with 57,706 aged between 60-64, and 47,155 aged between 65-69 years of age. There are also 287,142 females aged 24 and under.⁵⁷
- 4.60 According to the Travel Survey for NI In-depth Report 2017-2019, men aged 16+ made around the same proportion of their journeys by public transport (4%) as women aged 16+ (5%). Similarly, for the 16-29 and 30-59 age groups, men and women take a similar proportion of their journeys by public transport. However, women aged 60+ made a higher proportion of their journeys by public transport (6%), than men aged 60+ (3%).⁵⁸⁵⁹

- **Raising Age eligibility**

- 4.61 Increasing age eligibility for concessionary fares means that, after the change is implemented, individuals will experience a decrease in both the number of years and the proportion of adult life they can expect to receive free public transport.
- 4.62 However, removing free travel from 60-64's and increasing the eligibility based on age to State Pension Age may have a greater negative equality impact on women

⁵⁶ <https://www.nisra.gov.uk/system/files/statistics/census-2021-main-statistics-for-northern-ireland-phase-3-statistical-bulletin-sexual-orientation.pdf>

⁵⁷ [Census 2021 population and household estimates for Northern Ireland: Statistical bulletin \(nisra.gov.uk\)](https://www.nisra.gov.uk/system/files/statistics/census-2021-main-statistics-for-northern-ireland-phase-3-statistical-bulletin-sexual-orientation.pdf)

⁵⁸ For further information see Travel Survey for NI In-depth Report 2017-2019 (page 7): <https://www.infrastructure-ni.gov.uk/system/files/publications/infrastructure/tsni-in-depth-report-2017-2019.pdf>

⁵⁹ Data is not currently held on SmartPass holders by sex.

from this group, in comparison to men, because they may have less to spend on travel.

- 4.63 This is because women face economic disadvantage throughout their lives in comparison to men. They have on average, poorer career progression, higher rates of casual, part-time, and low status work, and receive lower pay. Research has highlighted that the disadvantage is mainly caused by traditional family/care roles, exacerbated by poor availability of affordable childcare (especially in Northern Ireland). All of this reduces women's ability to contribute to pension schemes and National Insurance payments.⁶⁰
- 4.64 In 2022, the LFS⁶¹ highlighted that in 2021 females earned 5.7 per cent less than males in Northern Ireland. The largest gender pay gap across all age groups occurred in the 50 to 59 age group, where men earned almost £2.50 more per hour than women (£15.33 compared to £12.87), an equivalent to a 16% pay gap. Older women are also more likely to leave employment earlier than men – between the ages of 63 and 64 for women compared to between 65 and 66 for men.⁶²
- 4.65 Additionally, the Travel Survey for NI In-depth Report 2017-2019⁶³ shows that, in general, women aged 17+ are less likely to hold a full driving licence (74%) than men aged 17+ (83%). In addition, urban residents aged 17+ are less likely to hold a full driving licence (73%) than rural residents aged 17+ (86%). Women in urban areas, where SmartPass uptake tends to be higher, are less likely to hold a driving licence (68%) than women in rural areas (84%).
- 4.66 While not having a driving licence does not necessarily mean that women are unable to travel by car (they may have a partner, spouse, or friend who they can travel with), it may mean that there are less travel options available to them.
- 4.67 Stakeholders, such as the Women's Policy Group⁶⁴ and Women's Regional Consortium⁶⁵, raised concerns that the options will have particularly significant impacts for women and will impact the most marginalised women the most, including but not limited to, rural women, disabled women, and women with caring responsibilities.
- 4.68 Stakeholders also identified that the options could have a potential negative impact, in particular on 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.

⁶⁰ [Women's Economic Transition to Retirement \(niassembly.gov.uk\)](https://www.niassembly.gov.uk/women-economic-transition-to-retirement/)

⁶¹ [Northern Ireland Labour Force Survey – Women in NI | Department for the Economy \(economy-ni.gov.uk\)](https://www.economy-ni.gov.uk/northern-ireland-labour-force-survey-women-in-ni/)

⁶² 2022 Labour Force Survey annual summary - see <https://www.nisra.gov.uk/system/files/statistics/TblLFS2199.XLSX>

⁶³ [Travel Survey for Northern Ireland In-depth Report 2017-2019 \(infrastructure-ni.gov.uk\)](https://www.infrastructure-ni.gov.uk/travel-survey-for-northern-ireland-in-depth-report-2017-2019/) (see page 62 of report)

⁶⁴ Women's Policy Group – Response to the Concessionary Fares Consultation (August 2023)

⁶⁵ Women's Regional Consortium (June 2023): Response to: Consultation on free and discounted fares on public transport (concessionary fares)

- 4.69 In its response, the Women's Regional Consortium also highlighted that a change in the age of eligibility for concessionary fares would limit some women's ability to access training or education, work, provide care and enable possibilities for social interaction and, in the long term, this could lead to increased social isolation, loneliness and poor health, particularly mental health.
- 4.70 The Community Transport Association's response⁶⁶ to the consultation concluded that, based on data from financial year 2021/2022, the high level of SmartPass usage on dial-a-lift journeys, and that these trips are taken by older, disabled people and women, these groups would be disproportionately impacted if there was a change to the Scheme (which is replicated on Dial a Lift).
- **Limiting SmartPass use to off-peak travel only and/or Limiting SmartPass use to bus only travel**
- 4.71 Research shows that men and women use public transport differently. According to a report by the United Nation, women "chain" their activities by combining multiple stops and destinations within a single, longer trip because of their household and caretaking responsibilities.⁶⁷ Restricting times and mode of travel may make these trips difficult and unaffordable, particularly for those on low income. Additionally, women may be traveling with dependents or groceries, adding complications and inconvenience, if public transport isn't affordable to use.
- **Application, renewal, and replacement fee**
- 4.72 There was a mixed response to the Option on whether to charge an application renewal and replacement fee. 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.
- 4.73 *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)*
- 4.74 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. Another dominant 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.

⁶⁶ Community Transport Association: Response to the NI Concessionary Fares Consultation (August 2023)

⁶⁷ For further information see: [5-13-add-building-safe-inclusive-cities-for-women.pdf \(stopstreetharassment.org\)](#)

'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)

- 4.75 Many respondents felt that introducing a fee would impact most on the people the Scheme was designed to help and would result in increased in social isolation amongst older people.

Disability

- 4.76 The 2021 Northern Ireland Census reported that one in four (24.3%) of the population in Northern Ireland had a limiting long-term health problem or disability.⁶⁸
- 4.77 19% of respondents to the 2017-2019 Travel Survey for NI stated they had some difficulty with travel due to a physical disability or long-standing health problem. There was no real difference between males and females except in the 70+ age group: more women aged 70+ had difficulty with travel (49%) than men aged 70+ (35%).⁶⁹
- 4.78 As expected, difficulty with travel due to a physical disability or long-standing health problem increases with age: 7% of 16–29-year-olds had difficulty with travel compared to 42% of those aged 70 and over.⁷⁰
- 4.79 Additionally, in Northern Ireland, some factors which may contribute to social exclusion, and which can be particularly prevalent, are long-term unemployment and disability.
- 4.80 Statistics from the LFS in 2022, show there is a large difference in employment rates between people with a disability and people without.⁷¹ For example, in the 60-64 age group 67.7% of those without a disability were in employment, compared with 25.9% of those with a disability.
- 4.81 Women with a disability generally have a higher employment rate than disabled males across all age bands (the opposite to people without a disability), except for 60-64 where the male rate is higher.
- 4.82 There also seems to be a difference around when employment rates start to drop off: for people with disabilities, the drop off is spread between the 50-54, 55-59, 60-64, and 65-69 age bands. Whereas for people without a disability, the drop off is

⁶⁸ [Census 2021 Main statistics for Northern Ireland - Statistical bulletin - Health \(nisra.gov.uk\)](https://www.nisra.gov.uk/system/files/statistics/Census2021MainStatisticsHealth.pdf)

⁶⁹ TSNi In-depth Report 2017-2019 (page 8). See page 77 of the report for definition. Report available at: <https://www.infrastructure-ni.gov.uk/system/files/publications/infrastructure/tsni-in-depth-report-2017-2019.pdf>

⁷⁰ TSNi In-depth Report 2017-2019 (page 8). See page 77 of the report for definition. Report available at: <https://www.infrastructure-ni.gov.uk/system/files/publications/infrastructure/tsni-in-depth-report-2017-2019.pdf>

⁷¹ Based on analysis of Labour Force Survey Data (2022): <https://www.nisra.gov.uk/system/files/statistics/TblLFS2199.XLSX>.

larger between the 55-59, 60-64, and 65-69 age bands. The implication is that those who are disabled are retiring / leaving the workforce at an earlier age than those who are not disabled.⁷²

4.83 Therefore, it could be argued that, while disabled people are more likely to experience social exclusion than those aged 60-64, many people with a disability can only avail of half fare travel, rather than free travel.

- **Free travel for those currently receiving a half fare concession due to a qualifying disability**

4.84 Public transport can be a lifeline for some people with disabilities, allowing them to attend education, employment, appointments and to keep in touch with family and friends. For some people within this group (for example people with epilepsy⁷³ and those who are blind or partially sighted)⁷⁴ this is the only method of travel they have available to them, as often they are unable to secure a driving licence due to their condition.

4.85 People with disabilities can face a range of barriers to accessing public transport. As highlighted by IMTAC in its response to the consultation, cost is only one barrier to accessing public transport – older people and disabled people in particular face other barriers, including the availability of transport, the accessibility of transport and the acceptability of transport options.⁷⁵

4.86 Nevertheless, increasing access to public transport by reducing transport costs has an important role to play in enabling disabled people to enjoy full, active, and independent lives, on an equal basis with others. It does so by reducing the financial costs, that prevent or act as a barrier for some disabled people from using public transport.

4.87 This is particularly important as disabled people can be at greater risk of social exclusion than other groups. Lower employment rates for disabled people remain a significant problem with transport constituting an important barrier to employment.⁷⁶

4.88 Over 80% of people without a disability are in work, compared to just 36% of disabled people, meaning there is a "disability employment gap" in Northern Ireland of 44% - the highest in the UK by a significant margin.⁷⁷ Yet, Northern Ireland is the only location in the United Kingdom and Ireland that currently does

⁷² Ibid: <https://www.nisra.gov.uk/system/files/statistics/TbILFS2199.XLSX>.

⁷³ Epilepsy Action NI (August 2023): Epilepsy Action NI submission to DFI's consultation on the concessionary fares scheme

⁷⁴ Guide Dogs NI (August 2023): Guide Dogs NI Response to Concessionary Fares Consultation

⁷⁵ IMTAC (2023) - Comments from Imtac about the Consultation on free and discounted fares on public transport (concessionary fares)

⁷⁶ In 2020 the employment rate for people with disabilities was 38.1%, the employment rate for people without disabilities was 80.3% The employment rate of people with disabilities in NI is the lowest of the 4 countries within the UK and the disability employment gap is the largest. For the majority of the 2014 to 2020 period, NI had the lowest employment rates (people with and without disabilities) but the largest disability employment gap. See [Disability Employment Gap in Northern Ireland 2020 \(nisra.gov.uk\)](#)

⁷⁷ [NI employment rate for disabled people is lowest in UK - BBC News](#)

not provide free travel for disabled people, despite people with disabilities in GB also receiving PIP.

- 4.89 Additionally, on average, disabled people have lower levels of private pension provision and are less likely to be in work in the period immediately preceding State Pension age than those without a disability.⁷⁸ Compared to the non-disabled population, disabled people are also more likely to be in low-paid employment and have interrupted work records; they are also more likely to leave the labour market early.⁷⁹
- 4.90 In 2023, the consumer group Transport for All also noted that, with the cost-of-living crisis, many disabled people are finding the limited transport options available to them too expensive to use. This includes public transport.⁸⁰
- 4.91 This was echoed by stakeholders⁸¹ during the consultation process with organisations stating that people living with disabilities are more likely to live in poverty than non-disabled people, making public transport less accessible for those that may rely on it more. Many stakeholders also highlighted that the affordability of transport can be a particular issue for those living in rural areas, where transport costs tend to be higher than in urban areas and disabled people may be more socially isolated.
- 4.92 A recent report by the Resolution Foundation⁸² into living standards for working-aged people with disabilities highlighted that (using incomes as an overall proxy for living standards) wide gaps exist between the disabled and non-disabled population throughout the UK. The gap in median household income between adults with a disability (£21,405) and without (£27,766) was 30% in 2020-21, but this comparison includes the income from disability benefits. If that income is excluded—on the grounds that it is intended to compensate for the additional costs of having a disability, even if only partially – then the gap rises to 44%.
- 4.93 A 2023 report from SCOPE⁸³ also highlighted that disabled people face unfair extra costs which impact on their standard of living, diverting their income to pay for specialist products and services, as well as paying more for everyday basics. These costs can include:
- Spending on specialist disability-related products and services that are essential and often costly; and include things like vital specialist equipment,

⁷⁸ People with disabilities face huge barriers to pension saving resulting in a private pension pot of 36% of the UK average (£47980 compared to £130,928). See [underpensioned index 2022 report.pdf \(nowpensions.com\)](#)

⁷⁹ The NISRA Labour Force Survey 2022 estimates showed that by age 60-64, only 25.9% of people with disabilities were in employment compared to 67.7% of people without disabilities. By age 65-69, this number fell to 9.4% and 35.5%, respectively. See [Coronavirus and its impact on the Labour Force Survey - Office for National Statistics \(ons.gov.uk\)](#)

⁸⁰ For further information see: [The cycle of transport poverty: how the cost-of-living crisis is locking disabled people indoors » Transport for All](#)

⁸¹ IMTAC (2023) - Comments from Imtac about the Consultation on free and discounted fares on public transport (concessionary fares)

⁸² [Costly-differences.pdf](#)

⁸³ [Disability Price Tag 2023: the extra cost of disability | Disability charity Scope UK](#)

mobility aids, car or home adaptations, medicines and therapies which are all expensive.

- Needing to spend more on everyday things – limited mobility may mean needing to purchase more expensive ready meals or rely on the delivery of household goods more.
- Higher usage of essentials – many disabled households have higher energy and transport costs.

4.94 The report stated that on average, disabled households (with at least one disabled adult or child) need an additional £975 a month to have the same standard of living as non-disabled households and equated the extra cost of disability as equivalent to 63% of household income after housing costs. These figures are accounting for disability benefit payments like Personal Independence Payment (PIP), which are designed to help address these costs.

4.95 This means that free transport could be of significant benefit to people with disabilities by removing the cost barrier to public transport and providing greater access to employment and training opportunities, key services and amenities, and social interaction. It can also have a financial benefit by reducing their spend on transport, leaving more of their income available for other necessities.

4.96 Many respondents highlighted 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.

4.97 *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)*

4.98 Many respondents to the consultation also expressed concern that NI 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.

- **Companion passes for disabled people unable to travel alone**

4.99 Introducing free companion passes can help address some of the barriers to accessing public transport faced by disabled people who are unable to travel alone. Epilepsy Action NI have highlighted that, for people with epilepsy, providing companion passes supports emergency care in the event of a seizure potentially avoiding hospital admissions and personal injury.⁸⁴

⁸⁴ Epilepsy Action NI: Epilepsy Action NI submission to DFI’s consultation on the concessionary fares scheme

- 4.100 Companion travel also has the potential to increase access to public transport for those with challenging behaviours, who need to be supervised at all times; those with severe cognitive and mental impairments (including people who have no awareness of risk and limited ability to plan and follow a journey); people with a combination of visual and hearing or visual and speech loss that prevents independent mobility, or those with difficulties using a wheelchair independently.
- 4.101 This option has the potential to help this group attend health and other appointments; access services and amenities; attend educational or training opportunities; or enable them to make more regular visits to family and friends, promoting their overall health and well-being.
- 4.102 Many responses to the survey acknowledged that a companion could 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.
- 4.103 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.
- **Extend the qualifying criteria for a Half Fare SmartPass in line with other UK jurisdictions**
- 4.104 Extending the Scheme to include a broader category of people with disabilities could have a positive equality impact on some disabled people who are currently not eligible to apply for the Scheme, such as those who are profoundly or severely deaf, those without speech, or those who are in receipt of the higher or medium rate care component of Disability Living Allowance (DLA)/PIP.
- 4.105 A commonly voiced opinion from those supportive of the proposal was that, as Northern Ireland is part of the UK, 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.
- 4.106 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.
- **Changes to the residence test and/or Proving residency**
- 4.107 Introducing changes to the residence test can make it easier for disabled people who intend to live permanently in Northern Ireland access the Scheme such as foreign nationals.

4.108 Widening the list of accepted proofs of residence would simplify the application process, remove any barriers, and make the Scheme more accessible to all. This could support disabled asylum seekers and homeless people with no fixed abode or permanent address who are already eligible for concessionary travel to access the Scheme.

- **Limiting SmartPass use to off-peak travel only and/or Limiting SmartPass use to bus only travel**

4.109 A removal of peak travel may disadvantage disabled people in work, impacting on their employment opportunities and economic participation. This is particularly important given that research by ECNI has highlighted that people with disabilities already face lower levels of employment and lower average earnings than their non-disabled counterparts.⁸⁵ Those without access to alternative transport may not make their journey, putting them at increased risk of social exclusion.⁸⁶

4.110 Removal of the rail concession may impact on concessionary fare users with disabilities who use rail services because they are more accessible than bus. 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 a much more accessible option for some disabled people and therefore limiting use of the SmartPass to bus only may increase their risk of social exclusion if they cannot make their journey by alternative means.⁸⁷

- **Raising Age Eligibility**

4.111 Additionally, although some disabled people may qualify for the Scheme, not all disabled people are eligible. This means that raising the age eligibility may negatively impact on some older disabled people who do not qualify for the Scheme on disability grounds.

4.112 Disabled people have lower levels of private pension provision and are less likely to be economically active than non-disabled people therefore, this change may have a greater impact on older disabled people as on average, their income is lower than people without a disability.

- **Application, renewal, and replacement fee**

⁸⁵ For further information see: [ECNI - Key Inequalities in Employment in Northern Ireland - Research and statement \(equalityni.org\)](https://equalityni.org)

⁸⁶ Twenty-six percent of respondents to question 7 in the public consultation indicated that if they could not use their SmartPass before 09:30, they would not make their journey.

⁸⁷ Thirty-two percent of respondents to question 11 in the public consultation indicated that if they could not use their SmartPass on rail, they would not make their journey

- 4.113 Among those who were content to pay a fee, 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. Imposing fees for lost or replacement cards may have a greater impact on vulnerable users of the Scheme, such as those with cognitive impairments who may tend to lose or misplace their SmartPass more frequently.

Dependents

- 4.114 Young people up to the age of 16 receive half fare concession under the Scheme (children under five already receive free travel without reimbursement). In addition, Translink offer a yLink card which provides 50% off the cost of travel for young people between 16 and 23.
- **Raising Age Eligibility and/or Limiting SmartPass use to off-peak travel only**
- 4.115 Raising age eligibility and limiting SmartPass use to off-peak travel only has the potential to impact on those with dependents who rely on older family members providing childcare, particularly where this care needs to be provided before 09:30 to allow parents to attend work.
- **Companion passes for disabled people unable to travel alone**
- 4.116 Although data specific to people with dependents (and those without) is not held in relation to Scheme, anecdotal evidence from those representing people with disabilities, has highlighted that those with disabled dependents (who cannot travel alone) are likely to benefit from companion travel if introduced.
- 4.117 Research has shown that many carers can struggle financially. The State of Caring report 2023⁸⁸, found that 75% of unpaid carers receiving Carer's allowance are struggling with cost-of-living pressures, while almost half (46%) are cutting back on essentials, including food and heating. 45% were even more likely to say they were struggling to make ends meet, compared with 39% last year.
- 4.118 Therefore, it is expected that providing free companion travel changes will have a positive impact on parents or carers of people with disabilities by reducing cost of living pressures and allowing more of people's budget to be spent on other essentials.

⁸⁸ [State of Caring survey | Carers UK](#)

5 Equality issues not included in the consultation

5.1 As part of the consultation, some stakeholders took the opportunity to raise wider equality and operational issues, not included under the ten options set out in the consultation, including that:

- the benefit of half fare travel in Northern Ireland is devalued in real terms given that it can be cheaper for half-fare users to purchase return tickets or special offer fares than use their SmartPass. Disabled users are also unable to use their SmartPass to available of discounts available to non-disabled passengers through account-based ticketing.
- the differing levels of concessions available to different groups of disabled people despite experiencing similar barriers to travel and similar levels of social exclusion (e.g. those who are blind who receive a full fare concession under the Scheme and those who are partially sighted who only receive a half-fare concession).
- the current eligibility criteria of the Scheme is overly restrictive and makes it difficult for people who are eligible to apply for the Scheme e.g. people with conditions such as epilepsy who have been told they cannot drive must first apply for a driving licence and provide evidence of refusal when applying for a half fare concession.
- inconsistencies across different modes of transport, for example people with disabilities can travel for free on Glider (which only operates in certain urban corridors), but not on other services (which would appear to disadvantage those living in rural areas).
- older people are required to attend a Translink depot to complete their application which can be difficult for older people with disabilities.
- the importance of addressing wider issues around public transport for people with disabilities including the accessibility and availability of transport.

5.2 The Minister has asked that a number of these issues be considered further in follow up to the public consultation including the restrictions on using the Half-Fare SmartPass for return/special offer fares and the requirement for those medically unfit to drive to apply for and be refused a driving licence.

6 Good relations

- 6.1 The following section outlines the potential good relations impacts of the options set out in the consultation.

Religious Belief

- 6.2 A number of the proposed changes promote free travel for a number of Section 75 groups which may allow for greater mixing between individuals and communities. As a high number of existing SmartPass holders report using their pass to visit family and friends⁸⁹ as well as to attend church and other religious events, there is also a potential residual impact of the plans on good relations.

Political Opinion

- 6.3 A number of the proposed changes promote free travel for a number of Section 75 groups which may allow for greater mixing between individuals and communities. As a high number of existing SmartPass holders report using their pass to visit family and friends, there is also a potential residual impact of the on good relations through the mixing of people who hold different religious beliefs.

Racial Group

- 6.4 Some changes promote free travel for a number of Section 75 groups which may allow for greater mixing between individuals and communities. The introduction of free public transport for asylum seekers can provide asylum seekers with an opportunity to integrate into society and may, therefore, positively impact on good relations between people of different racial groups.
- 6.5 This is because better access to public transport may encourage greater societal mixing, which in turn, has the potential to tackle prejudice and promote understanding⁹⁰ between people of different religious belief, political opinion and racial (ethnic) group.
- 6.6 Access to transport can also be a key barrier to integration and the extension of the Scheme to this group has the potential to enable participation in society and integration into new communities.
- 6.7 Alternatively, based on the feedback received as part of the public consultation, the option to extend the Scheme to asylum seekers also has the potential to generate negative attitudes. This is because some people feel that asylum seekers, having recently arrived in Northern Ireland, should not be entitled to free transport, and those people may treat asylum seekers with resentment or hostility.

⁸⁹ NI Concessionary Travel Scheme: Survey Analysis: See <https://www.infrastructure-ni.gov.uk/sites/default/files/publications/infrastructure/concessionary-fares-survey-report.pdf>

⁹⁰ [The key to a more integrated society: understanding the impact and limits of social mixing | British Politics and Policy at LSE](#)

7 Consideration of Mitigations/Alternatives

- 7.1 The EQIA process requires that, if it is decided that the policy may have an adverse impact on people in one or more of the Section 75 groups, then the authority must consider alternative policies and measures which might mitigate the adverse impact.
- 7.2 The Equality Commission advises that departments should seek to identify alternative proposals, within currently available funds, to mitigate any differential adverse equality impacts on specific equality groups. Following public consultation, the Department identified a range of mitigations to address the potential adverse impacts of Options 1-4 above including:
- not introducing some/all the cost saving options.
 - raising the age of eligibility for new applicants only.
 - the gradual implementation of some of the options (for example, by raising the age of eligibility each year).
 - exempting people with disabilities from changes which would limit the ability to use a SmartPass on off-peak services only or bus travel only.
 - capping application, renewal, and replacement fees at a certain level for some groups (e.g. those aged 65+).
 - waiving application, renewal, and replacement fees for persons of low income⁹¹ or for some S75 groups.
 - alternative policies to raise revenue, including a boarding charge for each time a concessionary pass is used.
 - capping the number or value of concessionary journeys that can be made annually.
 - promotional fares or discounted fares for some groups.
 - meaningful consultation with S75 groups and their representatives to ensure that any changes to policy are informed by S75 users.
- 7.3 The Minister intends to exempt some people from paying an application fee for a SmartPass, e.g. people with disabilities who would be eligible for a Half Fare SmartPass. However, a decision on this will be finalised following the Department's consultation on the draft budget for 2024/25.
- 7.4 Consideration will also be given to how to best meet the needs of Section 75 users in communicating any changes to the Scheme, such as ensuring the application

⁹¹ 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).

process is provided in accessible formats and advertising the changes in a range of formats and languages.

8 Monitoring

- 8.1 Following the budget consultation, the Minister will consider the decision to introduce fees and if confirmed, officials will work with Translink to determine the exact fee each group will be required to pay and the timeframe for implementation.
- 8.2 The Department intends to monitor the impact of any changes on the Scheme by assessing uptake of passes by different S75 groups following introduction of the fees. This will take place on a quarterly basis initially.
- 8.3 Further monitoring will be undertaken through consultation with S75 groups, including those representing older and disabled people, women's groups and those representing and working with minority ethnic groups, including the Refugee and Asylum Forum.
- 8.4 Consideration will be given to the range of S75 equality information that is collected in relation to the Scheme when the Department moves the application process online.
- 8.5 While the Minister will continue to consider the EQIA findings when making his decision whether to introduce the fees, any new or revised policy to implement the decision will be separately subject to screening/EQIA (i.e. to consider the detail of how this will be implemented in practice). This will include the systems and processes that might be put in place regarding how people apply for, replace, or renew their SmartPasses.