

# NI Concessionary Fares Scheme Consultation

## Addendum to Stage 6 Report

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**November 2024**

# 1 Background

- 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 to the draft EQIA, the Department identified the foreseeable equality impacts (both positive and negative) of the ten options identified in the consultation document and developed a draft Stage 6 report. This document has now been finalised and is published on the Department's website.
- 1.2 Having considered the outcome of the public consultation, on 11th June 2024, in launching the draft EQIA on the 2024/25 budget, the Minister announced his intention to make no changes to the age of eligibility for the Scheme<sup>1</sup>. However, in order to help protect the Scheme and manage costs, the Minister announced his intention to introduce fees for those applying for, renewing<sup>2</sup> or replacing their SmartPass. The Minister announced that the fees for first time applicants would be around £20 for the 60+ SmartPass and £12 for the Senior (65+) SmartPass, with renewal and replacement fees only being introduced when the application process moves online.
- 1.3 The Minister also noted that he intended to waive the fee completely for some groups, such as disabled people applying for a Half Fare SmartPass and those Registered Blind and War Disabled Pensioners. The equality impacts of the Minister's more detailed proposal on fees was considered as part of the consultation on the EQIA on the draft budget for DfI for 2024/25, which set out the Department's proposed spending plans for the financial year.

# 2 Summary of impacts

## ***Public consultation on changes to the NI Concessionary Fares Scheme (1<sup>st</sup> June 2023 – 24<sup>th</sup> August 2023)***

- 2.1 Analysis of responses to the Consultation on Changes to the NI Concessionary Fares Scheme, which closed in August 2023, concluded that the introduction of a fee of around £5 to £10 (the estimate provided in the consultation document) was

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<sup>1</sup> [O'Dowd protects concessionary fares and community transport in indicative budget allocations | Department for Infrastructure](#)

<sup>2</sup> SmartPasses are only valid for five years. Check the expiry date on the front of your SmartPass to see when it will run out, as it cannot be used to get free travel after this date. Around three months before each SmartPass expires, pass holders will get a letter explaining how to get a new pass.

likely to have a minor adverse impact. However, the extent of the impact would depend on the level of fee set and the circumstances of the individual.

- 2.2 The draft Stage 6 report highlighted that some people experience multiple adverse impacts and may be at more risk of substantive cumulative disadvantage than others.<sup>3</sup> 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.
- 2.3 The draft Stage 6 report concluded that a higher fee may have a greater negative impact on lower income groups or S75 groups less likely to be in employment such as people with disabilities and those aged 65 and over. The report found that the adverse impacts may be greater for women than men, particularly those on low income. One of the reasons for this is because older women are more likely to have fewer travel options available to them and, as a group, earn less than men throughout their lives.
- 2.4 While just under half of those responding to the June 2023 consultation were content to pay a fee<sup>4</sup>, 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 on the basis that this group is mainly dependent on asylum support, has limited income and would find even a small fee unaffordable.
- 2.5 Additionally, some respondents highlighted that 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 those already in poverty. Conversely, other respondents recognised that charging a fee has the potential to reduce the administration costs of the Scheme for everyone as it will discourage those who do not use the SmartPass from applying for it. A number of respondents also 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.

***Summary of responses to the Department's consultation on the 2024/25 budget (11<sup>th</sup> June 2024 – 6<sup>th</sup> September 2024)***

- 2.6 Similar views were expressed in relation to the more detailed proposal to introduce fees included within the consultation on the draft budget, which proposed that fees for first time applicants would be around £20 for 60+ SmartPass applicants and

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<sup>3</sup> Equality Commission (2023): Response to consultation: Department for Infrastructure - Free and discounted fares on public transport (concessionary fares)

<sup>4</sup> Of the respondents who answered Question 13 (n=7030), 46% agreed that the Department should introduce a fee for the SmartPass, while just over half (54%) think that it should not.

£12 for Senior (65+) SmartPass applicants, with renewal and replacement fees being introduced when the application process moves online.

- 2.7 In response to the budget consultation, one respondent voiced strong opposition to the decision to protect free travel for the 60-64 group, while another stated that they would be happy to pay a fee given the considerable benefits of free travel.
- 2.8 Some consultees also took the opportunity to voice their disappointment at the Minister's decision not to extend the half fare concession to free travel for people with disabilities at this time. In its response, the Inclusive Mobility Transport Advisory Committee (IMTAC)<sup>5</sup> voiced its opposition to the introduction of a fee for the Senior (65+) SmartPass applicants stating:
- Based on experience elsewhere Imtac believes it is justifiable to introduce a fee for people aged 60 and that £20 is reasonable. No other jurisdiction charges people in receipt of the state pension a fee for concessionary travel. Based on this Imtac does not support fees being charged in Northern Ireland for people in receipt of the state pension. Northern Ireland is unique in not aligning its concessionary fares scheme with the state retirement age. As part of beginning the extensive work of reforming and improving the current scheme, eligibility for the "senior" Smartpass should be equalised with the state pension eligibility.*
- 2.9 Royal National Institute of Blind People (RNIB) & Guide Dogs expressed a similar view. While the organisations welcomed the fact that administrative fees for renewal of the concessionary pass will not extend to eligible disabled passengers, they recommended that people registered partially sighted and therefore holding a half-fare Translink Smart Pass, should be able to avail of free public transport.
- 2.10 IMTAC supported the proposal to exempt those people with disabilities applying for a SmartPass from fees. However, it noted that *"this does little...to reduce the unjustifiable discrimination and inequality in the application of concessions between older people and disabled people. IMTAC's key recommendation around concessionary fares policy remains that Government must equalise concessions for older people and disabled people."*
- 2.11 In its response, the Law Centre welcomed the Department's proposal to exempt people with disabilities from SmartPass fees and recommended that the exemption should also be available for asylum seekers. In support of this recommendation, the Law Centre noted that asylum seekers are not eligible to receive any social security benefits or grants available to other vulnerable groups, such as Pension Credits or disability benefits. In addition, asylum seekers are not permitted to work and so have no means to increase their income. Nor are they permitted to obtain a driving license and so are particularly reliant on public transport.

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<sup>5</sup> [Comments from Imtac about the Department for Infrastructure Budget 2024 \(Final Version\) \(2\).docx](#)

- 2.12 The organisation's response also noted barriers to accessing the Scheme for most asylum seekers and recommended expanding the evidential requirements to ensure that asylum seekers can avail of it.
- 2.13 Women's Platform welcomed that no changes were being made to eligibility for the Scheme but noted that the application fee may impact negatively on those on lowest incomes, and recommended consideration should be given to how this can be mitigated, for example through payment in instalments, or excluding people on Pension Credit. Based on its own analysis the Department also recognises that women may be more impacted by the proposal than men. This is because, in addition to having lower earnings throughout their lives, 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.<sup>6</sup>
- 2.14 CIHT also welcomed the Department's decision to protect Concessionary Fares for the 60-64 age group but stated that this does not account for the increased costs faced in providing those services which is in effect a further reduction in what can be provided, again impacting significantly on some Section 75 groupings and indeed on rural communities.
- 2.15 These responses support the Department's own assessment that the fee may impact those on lower income, people with disabilities, and asylum seekers and may have a greater adverse impact on women than men.

### **3 Minister's final decision and mitigations**

- 3.1 Having considered responses to the public consultation on changes to the NI Concessionary Fares Scheme and responses to the consultation on the EQIA on the draft budget for DfI for 2024/25, the Minister still intends to introduce an application fee for first time 60+ and Senior (65+) SmartPass applicants.
- 3.2 The Minister also intends to introduce renewal fees for Senior (65+) SmartPasses and replacement fees for all categories of pass, but these will only be introduced when the SmartPass application process moves online.
- 3.3 As mitigation, the Minister intends to waive the application and renewal fee completely for some groups, such as disabled people applying for a Half Fare SmartPass and those Registered Blind and War Disabled Pensioners.
- 3.4 Following the outcome of the publication on the draft budget, the Minister also intends to exempt asylum seekers from all fees, in recognition that this group is at elevated risk of social exclusion and particularly reliant on public transport.
- 3.5 The Minister notes the potential for some women on low incomes to be more negatively impacted than men by the introduction of fees. However, the adverse

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<sup>6</sup> Analysis of Labour Force Survey data <https://www.nisra.gov.uk/system/files/statistics/TbILFS2199.XLSX>.

impact is expected to be minor. Potential mitigations identified by consultees, such as exempting people on pension credit or allowing applicants to pay by instalments, would be much more expensive to implement and would drive up the administration costs on which the fees are based and, as a result, could significantly increase the level of fee to be applied.

- 3.6 The Minister also recognises that older people (those of State Pension Age) are likely to experience higher rates of poverty than those in the 60-64 age group and are less likely to have access to a car.<sup>7</sup> The Minister will continue to assess the equality impacts on S75 users when deciding the fee for each type of SmartPass, including the renewal fee, (the fee most likely to be charged by users within this age group). The exact fees to be charged for each application type will be set out in Regulations.
- 3.7 The Minister has asked that a number of other equality issues be considered further in follow up to the public consultation. Any decisions made on these issues will be subject to separate equality screening exercises. 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 process is provided in accessible formats and advertising the changes in a range of languages.

## **4 Monitoring**

- 4.1 The Department intends to monitor the impact of the introduction of fees by assessing trends in the uptake of passes, (on a quarterly basis initially) and comparing these against uptake prior to the introduction of fees. The Minister will continue to consider the EQIA findings when making his decision on the exact fees to be introduced and ahead of any planned changes to the fee amount.
- 4.2 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 with a view to providing more disaggregated information by S75 group. A separate screening exercise will be conducted in relation to the move to online fees and will consider the categories of information to be collected.

**Department for Infrastructure  
December 2024**

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<sup>7</sup> Data from the Continuous Household Survey 22/23. This shows that the proportion who said yes to the question 'Do you currently own or have access to a car or van?' was significantly different between responses for those aged 60 to 64 (83%) and those aged 65 and over (75%). The figure for all respondents who said yes was 77%.