



Department for
Infrastructure

An Roinn
Bonneagair

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Infrastructure

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Consultation on free and discounted fares on public transport (concessionary fares)

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Summary

The Northern Ireland Concessionary Fares Scheme (the Scheme) was established to promote accessible public transport for members of the community who are most at risk of social exclusion. It aims to do so by providing free and discounted fares on public transport for some groups of people.

This consultation sets out the changes that we are thinking about making to the Scheme (now and in the future) and asks you questions about how these changes would impact on you. The consultation is designed to inform our review of concessionary fares and future work in this area.

Consultation Description

The Department for Infrastructure (the Department) recognises the importance of free and discounted travel in the everyday lives of older and disabled people. We also understand the important economic, social, and environmental benefits of the Scheme that go beyond the immediate benefits to concessionary fares passengers themselves.

However, the costs of the Scheme are significantly higher than they were in 2007/08, when the Scheme was last amended to introduce free travel for all 60–64-year-olds and are anticipated to rise in the future. This is due to more people living longer and bus fares increasing in real terms over time.

We therefore need to consider how we can ensure the Scheme is financially sustainable and continues to be available for future generations.

With this in mind, we have looked at the Scheme to identify changes to the current eligibility criteria which could reduce the costs of the Scheme while ensuring it continues to be targeted on those who are most vulnerable, or liable, to social exclusion. These proposed changes are set out in Part A of the consultation.

At the same time, the Department also recognises there are other changes that could be made to the Scheme that could help promote greater social inclusion in the longer term. These proposed changes

(some of which will increase the costs of the Scheme) are set out in Part B of the consultation.

Any changes that would increase the total costs of Scheme would require additional budget. However, we are consulting on these changes now to inform decisions on how the Scheme might operate in the future.

Other options (such as extending the Scheme to younger people aged 16-23) were considered but are not being consulted on at this time. We may consult on these changes at a future date.

Give us your views

We would like to consult with you to understand the impacts that any changes could have on current and future users of the Scheme. On some issues the Department already has a clear proposal, while on others it has yet to come to a view as to which option is preferred. No decisions have been made yet.

The consultation can be responded to in full or in part, guided by where your interest lies. Each option should be considered independently of the other (the options are not designed to be a package of measures). You may find it helpful to answer questions as they arise at the end of each option.

We know that not everyone will wish or feel able to answer all of the questions in this consultation. You are encouraged to answer the questions you would like to respond to, but you don't have to respond to all of them. There are some questions you have to answer on the 'About you' page. Once these have been completed you may submit your response.

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1. WHY ARE WE UNDERTAKING THIS REVIEW?

Introduction and background

- 1.1. The Department for Infrastructure (the Department) currently funds free and half fare public transport at all times of the day for those who qualify for a SmartPass under the Northern Ireland Concessionary Fares Scheme (the Scheme). The aim of the Scheme is to promote accessible public transport for members of the community who are most at risk of social exclusion.¹
- 1.2. There is often a strong correlation between social exclusion and poverty, although the two issues are not identical. Social exclusion is about more than income poverty. Promoting social inclusion means having an ‘inclusive society in which people of all ages and backgrounds are respected and cared for and in which we all prosper. A society which has no barriers to prevent people from living fulfilling lives’.²
- 1.3. In order to promote social inclusion, the following concessions are provided on eligible scheduled services operated by Translink and other participating operators:

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

¹ See Department for Infrastructure website - [Concessionary travel in Northern Ireland | Department for Infrastructure \(infrastructure-ni.gov.uk\)](https://www.dfi.gov.uk/concessionary-travel-in-northern-ireland)

² Draft Programme for Government: [PfG draft Outcomes Framework consultation \(northernireland.gov.uk\)](https://www.northernireland.gov.uk/pfg-draft-outcomes-framework-consultation)

- 1.4. People aged 65 and over who are permanent residents of Northern Ireland can also enjoy free cross border travel and internal Republic of Ireland travel (subject to any visa restrictions).³
- 1.5. Eligible groups can also avail of concessionary travel on community transport services, as well as the Strangford and Rathlin Island ferry services. These concessions are provided under bespoke arrangements, funded by DAERA (Assisted Rural Transport Scheme, ARTS) and the Department (Strangford and Rathlin Island ferry services) respectively, but are not part of the Scheme.
- 1.6. Other jurisdictions offer similar concessionary fare schemes. Reference is made to these schemes throughout the document for comparative purposes.

Concessionary Fares in Northern Ireland

- 1.7. Translink is the main public transport provider in Northern Ireland and administers the Scheme on the Department's behalf. The Department reimburses Translink, and other participating operators, for the costs of the Scheme, applying a principle that operators are no better or worse off as a result of their participation in it.
- 1.8. The Scheme is very popular with nearly 18 million concessionary journeys⁴ taken by SmartPass users in 2018/19 (pre-COVID). Approximately 56% of the eligible older population (those aged over 60) use their SmartPass.⁵
- 1.9. Data on use of the concessionary fares scheme in England shows that people are more likely to take up the concessionary travel pass if they are in lower income households, have no access to

³ War Disablement and Registered Blind SmartPass holders are allowed to travel for free on point-to-point cross border bus and rail services, but not valid on journeys made entirely within the Republic of Ireland

⁴ DfI Management Information. These figures reflect the number of concessionary journeys reimbursed by the Department to operators participating in the Scheme and are collated from documentation supporting claims submitted by such operators for reimbursement of fares foregone. These figures are used internally for monitoring purposes.

⁵ [Northern Ireland Transport Statistics 2018-2019 \(infrastructure-ni.gov.uk\)](https://www.infrastructure-ni.gov.uk)

cars, live in urban areas or generally live near better transport links.⁶ Similar research has not been completed in Northern Ireland, however, anecdotal evidence suggests that the user profile is similar here.

- 1.10. A 2019 survey by the Department has highlighted that people in Northern Ireland use the SmartPass for a number of reasons including to stay active, meet friends, access goods and services and to travel to and from work.⁷ The financial benefits of the Scheme are of most importance to users, with 86% of respondents to the survey agreeing with the statement *“Using a SmartPass enables me... to afford more things as public transport is cheaper or free”*.⁸
- 1.11. While these direct benefits are to be expected, the Scheme also generates considerable indirect benefits such as decongestion from journeys switched from cars to public transport⁹, and benefits to the local economy from increased expenditure as a result of more frequent shopping and leisure trips.¹⁰
- 1.12. Free and discounted travel also benefits the wider community by enabling older and disabled people to volunteer, stay involved in church or charity work, help with childcare, or visit friends and family. Greater involvement and participation in the local community, in turn, has the potential to generate benefits for the concessionary passholder, reducing social isolation, increasing independence, and promoting good health outcomes.
- 1.13. While these benefits are difficult to quantify, it is clear that the Scheme makes a significant contribution to people’s lives here, as well as contributing to government’s wider social, economic, environmental, and public health goals.

⁶ Department for Transport (2016): Evaluation of Concessionary Travel – the impacts of the free bus pass

⁷ [Northern Ireland Concessionary Fares Scheme - 2019 Survey Analysis \(infrastructure-ni.gov.uk\)](https://www.infrastructure-ni.gov.uk/northern-ireland-concessionary-fares-scheme-2019-survey-analysis)

⁸ Department for Infrastructure (2019): NI Concessionary Fares Survey - 2019

⁹ 79% of respondents said it made them use the car less

¹⁰ 78% of respondents said they used it to access goods and services

Costs of the Scheme

- 1.14. The cost of the Scheme depends on how many people travel on public transport and how many times they travel using a SmartPass. COVID had a massive impact on travel patterns, and it is therefore most realistic to look at figures from the last full year before COVID.
- 1.15. In 2018/19, the total cost of the Scheme was £47.9m against a baseline budget of £41m.¹¹ This means that the cost of the Scheme was nearly £7m more than the opening budget for that year.
- 1.16. Spending on fares for people over 60 (including Republic of Ireland seniors) made up 74.7% (£35.8m) of the total costs. The costs for those with disabilities accounted for 3.3% (£1.6m) of overall costs.

Total cost by concessionary category 2018/19¹²

Concession Category	Total costs	% of Total
Seniors (65+) (NI)	£26,152,989	54.6%
60+ (60-64)	£9,399,538	19.6%
Children	£8,176,878	17.1%
Cross Border ¹³	£1,785,118	3.7%
Half Fare	£1,034,745	2.2%
Registered Blind	£351,381	0.7%
Seniors (ROI) ¹⁴	£225,341	0.5%
War Disabled	£193,725	0.4%

¹¹ DfI Management Information. These figures reflect the costs reimbursed by the Department to operators participating in the Scheme and are extracted from the Departmental General Ledger. The expenditure is audited by external consultants and NIAO and is reflected in the Departmental Accounts.

¹² DfI Management Information. These figures reflect the costs reimbursed by the Department to operators participating in the Scheme and are extracted from the Departmental General Ledger. The expenditure is audited by external consultants and NIAO and is reflected in the Departmental Accounts.

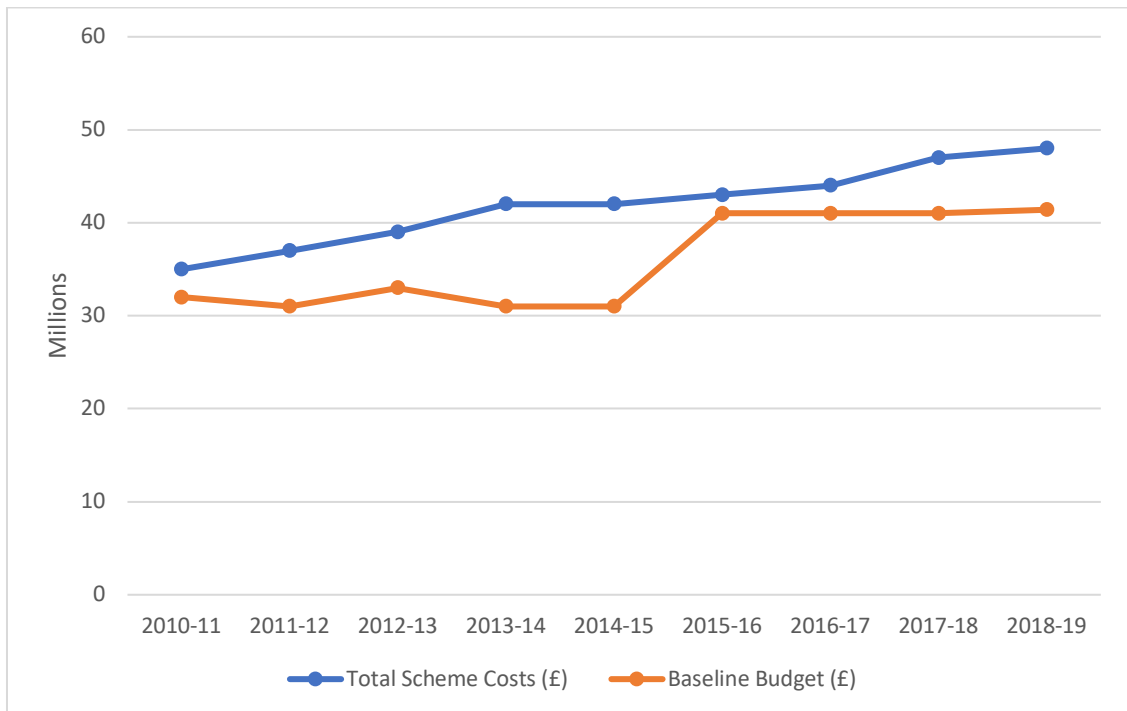
¹³ NI SmartPass holders and ROI residents travelling on cross-border services – the Department pays the percentage of the journey in NI for each route

¹⁴ ROI residents aged 66+ travelling using a SmartPass on services within Northern Ireland

Administration Costs	£589,575	1.2%
Total Costs	£47,909,290	100%

- 1.17. These overall costs (£47.9m) were over double the cost of the Scheme in 2007/08 (£22.0m) prior to the introduction of free travel for those aged 60-64 years. This is due to a variety of reasons including increased fares and an increase in the eligible population entitled to the age-related concession.
- 1.18. The costs of the Scheme have continued to rise significantly since 2010/11. As a result, the Scheme is reliant on receiving additional in-year funding each year to cover its costs, which is not always guaranteed to be available.

Chart 1: Total Scheme Costs and Allocated Baseline Budget 2010/11 – 2018/19¹⁵



¹⁵ DfI Management Information. These figures reflect the costs reimbursed by the Department to operators participating in the Scheme and are extracted from the Departmental General Ledger. The expenditure is audited by external consultants and NIAO and is reflected in the Departmental Accounts.

- 1.19. During COVID, passenger numbers were impacted by the pandemic and have yet to fully recover. There were 13.6m¹⁶ concessionary journeys taken by SmartPass users in 2022/23, some 29% below pre-COVID levels.
- 1.20. This reduction in concessionary fare passenger journeys has meant that the Department has been able to meet the costs of the Scheme from its budget in more recent years. However, this is expected to be only a temporary situation, which will no longer be the case as passenger numbers continue to grow.
- 1.21. In 2022/23 the Scheme cost £39m.¹⁷ In 2023/24, the Department estimates that the cost of the Scheme will rise to £44.6m – this increase is due to passenger numbers continuing to recover and fare increases.
- 1.22. Looking forward over the next number of years, as more people are living active, healthy lives for longer, the financial pressures on the Scheme will continue to increase as more people become eligible. Based on current population estimates¹⁸ and no changes to the Scheme, this means that it could cost as much as £52.1m by 2030.
- 1.23. About 95% of the Department’s budget delivers front-line service provision, with the vast majority regulated, statutory, fixed or contractually obliged, meaning there is no opportunity to reallocate budgets to meet the Scheme’s rising costs from other areas which are also under considerable pressure.
- 1.24. Therefore, if there is no increase in the Department’s budget, there is likely to be a significant funding gap between the Scheme’s baseline budget and the cost of providing the Scheme. This means

¹⁶ DfI Management Information. These figures reflect the number of concessionary journeys reimbursed by the Department to operators participating in the Scheme and are collated from documentation supporting claims submitted by such operators for reimbursement of fares foregone. These figures are used internally for monitoring purposes.

¹⁷ DfI Management Information. These figures reflect the costs reimbursed by the Department to operators participating in the Scheme and are extracted from the Departmental General Ledger. The expenditure is audited by external consultants and NIAO and is reflected in the Departmental Accounts.

¹⁸ <https://www.nisra.gov.uk/publications/2020-based-interim-population-projections-northern-ireland>

the Department will not be able to afford to fund the Scheme in its current form.

- 1.25. If the Department cannot fund the costs of the Scheme, this could put the delivery of public transport services, or other Departmental services, at risk.

Objectives and expected outcomes

- 1.26. The Department has decided to undertake a review of certain aspects of the Scheme (the Review). The Review is aimed at:
- Making the Scheme financially sustainable, so that it can continue to be provided for years to come; and
 - Ensuring the Scheme is targeted at members of the community who are most vulnerable, or liable, to social exclusion
- 1.27. These priorities can, at times, compete with each other and, as a result, some of the options identified are likely to reduce the costs of the Scheme, while others will increase it. Based on the current budget situation, it is likely that the Department will not be able to make changes that will increase the costs of the Scheme this financial year. However, we may be able to do so in the future and so we are consulting on a wide range of proposals now.
- 1.28. In developing each option, we have undertaken research on the travel concessions available in neighbouring jurisdictions. We have also completed an equality screening and draft equality impact assessment (EQIA). As part of the consultation process and in line with our duties under Section 75 of the Northern Ireland Act 1998 and Rural Needs Act (Northern Ireland) 2016, we will continue to assess the equality impacts of our proposals on Section 75 Groups and those living in rural areas on an ongoing basis.
- 1.29. The cost implications of each proposal are outlined in more detail in Annex A and are within a broad range (i.e., rough order of magnitude of additional costs or savings). This means that, for each Option, they are a general estimate of the costs or savings.

- 1.30. The difficulties in accurately estimating costs include lack of information in relation to behaviour. As an example, if train travel is not included in the Scheme, we cannot accurately determine how many people would choose to travel by bus, how many would stop travelling, and how many would continue to use the train and pay for their journey. The effects of this behaviour change would also have an impact on the fares received by Translink and ultimately the subsidy that needs to be provided to Translink by the Department for delivering bus and train services. Broadly speaking the subsidy refers to the public funding provided to Translink to meet transport costs which are not recouped from fare paying passengers. This subsidy supports lower fares and allows Translink to deliver routes in areas of low demand.
- 1.31. In setting out the range of costs / savings in Annex A we are therefore providing the best available information to allow the relative impact of each option (i.e., the general level of cost or saving of one option compared to the other) to be considered as you respond to this consultation.

Next steps

- 1.32. Following the closing date, all responses will be analysed and considered along with other available evidence to inform recommendations from our ongoing review of the Scheme.
- 1.33. It will then be up to the Minister (or should there continue to be an absence of Ministers in the NI Executive, the relevant decision maker¹⁹) to consider the outcome of the Review. They will then decide how many of the proposals to act on, how to do this, and the timing of any changes. In deciding what changes to introduce and when, the decision maker will consider the impact of any changes on the financial sustainability of the Scheme. If any of the changes are implemented, it is likely that we would do this in stages.

¹⁹ Taking into account the decision-making framework set out in the Northern Ireland (Executive Formation etc.) Act 2022 or relevant legislation in place at the time

PART A: OPTIONS TO REDUCE THE COST OF THE SCHEME

The costs of delivering the Scheme in its current form exceed the baseline budget. These costs will continue to rise due to a growing eligible population entitled to the age-related concession and fare increases. By 2030, we estimate that the costs of delivering the Scheme will be in the region of £52.1m. These costs are not sustainable, and the Department will not be able to afford to deliver the Scheme without a corresponding increase in the Department's budget. The Department therefore needs to look at options to make the Scheme more affordable.

The options set out in this part include proposals to reduce the costs of the Scheme and recover (get back) the administration costs of delivering the Scheme. When identifying options to reduce costs, we returned to the policy aim of the Scheme which is to reduce social exclusion for members of the community who are most vulnerable, or liable, to social exclusion. From there we attempted to identify changes to the eligibility criteria which would deliver cost savings while still ensuring that those groups most at risk of social exclusion continued to receive concessionary travel.

The options presented in this part are the main options under consideration. We are, however, open to alternative options to reduce costs and make the Scheme more affordable.

2. OPTION 1 – RAISING AGE ELIGIBILITY

Background

- 2.1. In Northern Ireland, concessionary travel is provided for those over the age of 60. There are two types of SmartPasses available: the 60+ SmartPass (for those aged 60-64) and the Senior (65+) SmartPass (for those aged over 65).
- 2.2. Providing free travel for those aged 60-64 years of age is more generous than the mandatory concession offered to concessionary fares passholders in England and the Republic of Ireland.
- 2.3. In other jurisdictions, concessionary travel is provided at the following age thresholds:

Minimum age of eligibility by Country or Region

Country/Region	Minimum age of eligibility
Northern Ireland	60
England*	State Pension Age (currently 66 for those reaching State Pension Age now)
Scotland	60
Wales	60
Republic of Ireland	66

* This is a statutory concession meaning that local authorities must provide it. **Local authorities may provide further concessions** in accordance with their local priorities – these extend only to the local authority area borders unless a cross-border agreement has been reached with a neighbouring authority. For example, the Freedom Pass, which is the London Council branding for the English National Concessionary Travel Scheme, can be used outside London. Transport for London also offer a 60+ London Oyster card which provides free travel for those living in London between 60 and State Pension Age on various forms of public transport including bus, tube, tram, etc. This is a discretionary concession funded locally, rather than the statutory concession.

2.4. In 2018/19, 68% of total SmartPass users (excluding children) in Northern Ireland were Senior (65+) Users, while 26% were 60+ Users.²⁰ In the same year costs relating to the 60+ SmartPass group made up almost a fifth of the costs of the overall Scheme (£9.4m), while costs relating to the 65+ group made up over half the costs of the Scheme (£26.2m).²¹

2.5. As set out in earlier sections, the Scheme delivers significant benefits to concessionary fares users and to wider society. It enables many older people to live active, healthy, and independent lives, and participate more fully in the community, for example, through volunteering, continuing to work or providing childcare.

²⁰ DfI Management Information. These figures reflect concessionary fare user data held on the Translink Card Management System. This information is shared with the Department on an annual basis. These figures have undergone limited quality assurance and are used internally by the Department for monitoring purposes.

²¹ DfI Management Information. These figures reflect the costs reimbursed by the Department to operators participating in the Scheme and are extracted from the Departmental General Ledger. The expenditure is audited by external consultants and NIAO and is reflected in the Departmental Accounts.

Increased participation in society helps improve equality of opportunity and active ageing for older people.²² This can be particularly important for older people living in rural areas, those on low incomes and those who cannot drive or do not have access to a car.

- 2.6. While the Scheme makes an important contribution to the everyday lives of older people and wider society, important demographic changes mean that the Scheme is becoming increasingly more expensive. Looking forward, the proportion of older people aged over 60 in the general population in Northern Ireland is set to increase from 22.6% in 2020 to 28.8% in 2035.²³
- 2.7. While the fact that people are living longer healthier lives is to be celebrated, it also means that costs for the Scheme will significantly increase, putting further pressure on the Department's budget. The inevitable impact is that we will need to increase the budget for the Scheme or reduce the cost of it.

Proposals

- 2.8. Given that further funding is not available to the Department this financial year, to make the Scheme sustainable the Department is considering reducing the cost of the Scheme by increasing the age when people are entitled to apply for it.
- 2.9. Raising the eligibility age of the Scheme would reduce the number of cardholders and the number of journeys made by passengers, therefore, the costs to the Department would also reduce.
- 2.10. The Department has put forward 3 options:
- **Option 1A** – make **no change** to the Scheme, leaving the eligibility rules as they are now; or
 - **Option 1B** – **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

²² See: [Active Ageing Strategy \(communities-ni.gov.uk\)](https://www.communities-ni.gov.uk), page 13 (Outcome 1)

²³ <https://www.nisra.gov.uk/publications/2020-based-interim-population-projections-northern-ireland>

existing Senior (65+) SmartPass). The change would apply to existing 60+ SmartPass users as well as new applicants.

- **Option 1C – remove the concession** from the 60-64 age group and **raise the age of eligibility to State Pension Age (SPA)**. The SPA for men and women is currently 66 and will increase to 67 between 2026 and 2028. This would apply to existing 60+ SmartPass users as well as new applicants. However, for practical purposes, those who currently hold a Senior (65+) SmartPass who may not have reached SPA would continue to be able to use it.

- 2.11. As eligibility for the Rathlin and Strangford ferry services and the Assisted Rural Transport Scheme reflects the eligibility for concessionary fares, changes to age eligibility will also impact rural community transport users and those travelling by ferry.

OPTION 1A

- 2.12. Option 1A involves continuing to fund concessionary travel for those 60 and over. This option therefore represents no change in the current policy.
- 2.13. Maintaining age eligibility for the Scheme at 60 means that older people will continue to benefit, and the economic, social, and environmental benefits of the Scheme will continue to be realised.
- 2.14. However, as set out earlier, the costs of the Scheme will continue to rise significantly and if the Department does nothing and our budget does not increase, the Scheme will be unaffordable. If this happens, this could put the delivery of public transport services, or other Departmental services, at risk.
- 2.15. Additionally, as people live longer, retire later, and remain active later in life, they may be at a relatively low risk of social exclusion at age 60. This policy option of 'do nothing' therefore arguably represents a poor targeting of limited resources and is potentially inconsistent with the policy aim of reducing social exclusion.

OPTION 1B

- 2.16. Under this option, free travel would be removed for 60+ SmartPass holders (i.e., those aged 60-64 years of age). We estimate that this would affect around 70,240 people.²⁴
- 2.17. This would mean that following the change people aged 60-64 would have to pay for public transport until they reach the age of 65 unless they qualified for a SmartPass on the grounds of disability. The age criteria for applying for a disabled person's SmartPass (currently between 16-59) would be increased to between 16-64.
- 2.18. There are a number of reasons why raising the age eligibility for concessionary fares is being considered. Firstly, free travel for those aged 60-64 was introduced in 2008 to address equality issues between men and women who, at that time, qualified for State Pension at 65 and 60 years of age, respectively. With pension age having since been equalised, the case for providing concessionary travel to 60–64-year-olds on equality grounds no longer stands.
- 2.19. Secondly, while some of those aged between 60-64 leave the workforce due to ill health, caring responsibilities, early retirement, or other factors, many people who receive free public transport are still working. In 2022, 61.5% of males and 44% of females aged 60-64 were employed. This compares to 56.2% and 24.7% respectively in 2014, indicating that people in this age band are staying in the workforce longer.²⁵
- 2.20. Statistics from the Labour Force Survey in 2022 also indicate that employment rates peak during 25-49 years of age with 83.1% of the overall population in employment in 2022. From here, employment rates decline at a steady rate up to age 60-64 when 52.7% of the overall population are in employment.²⁶ There is a

²⁴ DfI Management Information. These figures reflect concessionary fare user data held on the Translink Card Management System as at 13th April 2023

²⁵ Labour Force Survey

²⁶ Employment rates by age band for 2022: 49.6% (16-24 years of age); 83.1% (25-49 years of age); 75.6% (50-54 years of age); 67.5% (55-59 years of age); 52.7% (60-64 years of age); 24.9% (65-69 years of age); 8.5% (70-74 years of age); 1.8% (75+ years of age)

large reduction following this with only 24.9% of those aged 65-69 in employment; this reduces further to 8.5% for those aged 70-74. Furthermore, in 2022, 67.7% of non-disabled people in the 60-64 age group were employed compared with 25.9% of disabled people in the same age group.

- 2.21. These statistics suggest that the 60–64-year-old age group may not be as socially excluded as others such as those with disabilities or those over age of 65. Raising the age at which people become eligible for a SmartPass (whilst retaining separate concessionary passes for disabled people) might therefore be unlikely to negatively impact on the social inclusion benefits of the existing Scheme.
- 2.22. Removing concessionary travel from those aged 60-64 years will reduce the costs of the Scheme. The level of cost reduction will depend on the number of passengers who continue to travel by public transport after the change is made and pay a fare. It will also depend on the number of people who apply and are eligible for a SmartPass on disability grounds.
- 2.23. Notwithstanding the cost benefits in raising the age eligibility for concessionary fares, the policy is likely to have a negative impact on some groups, particularly those on low incomes, those who do not have access to a car, those in rural areas and women (who have lower rates of employment than males and who also tend to be less likely to hold a driving licence than men). As well as removing the benefits associated with the Scheme, there are also potential costs which may arise from removing the concession from the 60-64 age group including health related costs associated with poorer physical and mental health.
- 2.24. Additionally, it is difficult to predict how many of the 60-64 age group would continue to travel by public transport and it is likely that a number will choose to travel by car. As well as having a negative impact on the environment and increasing congestion, this would be contrary to the Department's objective of increasing the number of people using public transport to reduce carbon emissions.

OPTION 1C

- 2.25. Under Option 1C, free travel would be removed for 60+ SmartPass holders (i.e., those aged 60-64 years of age) and the age of eligibility raised to SPA. The SPA for men and women is currently 66 and will increase to 67 between 2026 and 2028.
- 2.26. This would mean that, following the change, people aged 60-64 would have to pay for public transport until they reach SPA, unless they qualified for a SmartPass on the grounds of disability. Those aged 65 and over who currently hold a Senior (65+) SmartPass would continue to receive free travel. The age criteria for applying for a disabled person's SmartPass (currently between 16-59) would be increased to between 16 and SPA.
- 2.27. This would align the age criteria for access to the Scheme with England²⁷ (as set out above) and is consistent with wider government policy around access to the State Pension.
- 2.28. Removing concessionary travel from those aged 60-64 years and increasing eligibility to SPA will reduce the costs of the Scheme. As with Option 1B, the level of cost reduction will depend on the number of passengers who continue to travel by public transport after the change is made and pay a fare. It will also depend on the number of people who apply and are eligible for a SmartPass on disability grounds.
- 2.29. The disadvantages associated with this option are similar to Option 1B in that it removes the benefits of the Scheme from individuals, as well as to wider society. It would also take more time to fully implement and would initially be more complex to administer.

Mitigations

- 2.30. One option to mitigate the impact of the above proposals is to apply the new age eligibility criteria to new applicants only. This would mean that existing 60+ SmartPass holders would continue to be able to use their pass and the new age for eligibility would

²⁷ However, it should be noted that, in England free travel is only available on bus

apply to new applicants only. A clear benefit with this mitigation is that it does not penalise current 60+ SmartPass holders.

2.31. However, applying the policy in this way could be considered unfair as new applicants to the Scheme would need to wait for an additional five years before receiving their pass (if they become eligible at 65) or six years (if eligibility was linked to SPA). So, for example, someone who had turned 60 and applied for their SmartPass would still be eligible for a SmartPass whereas someone who was just approaching 60 would not be eligible for another five to six years. When SPA increases to 67 between 2026-2028, new applicants would not receive their SmartPass until 67 (seven years after those existing SmartPass holders who had received their passes at 60).

2.32. While applying the new age eligibility criteria to new applicants only would mitigate the impact on current 60+ SmartPass holders, it would also reduce the potential savings to the Scheme.

Question 1: Do you think changes should be made to the age eligibility for the Scheme?

Yes

No

Question 2: If the Department was to introduce changes to the age eligibility, which is your preferred option? (Select one answer)

Increase age eligibility to 65 and apply this change to existing 60+ SmartPass users and new applicants

Increase age eligibility to 65 and apply this change to new applicants only

Increase age eligibility to State Pension Age and apply this change to existing 60+ SmartPass users

Increase age eligibility to State Pension Age and apply this change to new applicants only

Question 3: If you already hold a 60+ SmartPass but in future were not able to use it, how would you make your journeys the majority of the time? (Select one answer)

I would still travel by public transport and pay a fare

I would walk, wheel or cycle

I would travel by car

I would not make my journey

Other - please specify:

Question 4: If you wish to provide comments supporting your answers, please do so below.

3. OPTION 2 – LIMITING SMARTPASS USE TO OFF PEAK TRAVEL ONLY

Background

- 3.1. In Northern Ireland, SmartPass holders can travel at any time of the day. This aspect of the Scheme is more generous than the mandatory concession offered to concessionary fares passholders in England.
- 3.2. In other jurisdictions, passes can be used at the following times of the day:

Time Travel Restriction by Country or Region

Country/Region	Concessionary Travel Times
Northern Ireland	Anytime
England*	Journeys starting between the hours of 09:30 and 23:00 (inclusive) on Mondays to Fridays and at any time on Saturdays, Sundays, and Bank Holidays
Scotland	Anytime
Wales	Anytime
Republic of Ireland	Anytime

* This is a statutory concession meaning that local authorities must provide it. **Local authorities may provide further concessions** in accordance with their local priorities – some local authorities allow travel at any time of the day, but this is at their own discretion.

- 3.3. Data from Translink below shows the percentage of concessionary fares journeys made at peak and off-peak times during 2022/23.²⁸

²⁸ Translink Management Information. These figures reflect passenger journey data held on the Translink Management Information Database (MERIT). These figures have undergone limited quality assurance and are used internally for monitoring and reporting purposes.

Category	Peak Travel	Off-Peak Travel
Senior (65+)	9.1%	90.9%
60+	16.5%	83.5%
Registered Blind	15.3%	84.7%
War Disabled	13.9%	86.1%
Half Fare	14.7%	85.3%
All	11.5%	88.5%

Proposal

- 3.4. One option to make the Scheme more affordable is to change the times people can travel off-peak only. This is because it would mean that those people who choose to continue to travel at peak time in the morning would need to pay a fare reducing the costs of the Scheme.
- 3.5. 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 using their SmartPass at other times, including at any time on Saturdays and Sundays and on Bank Holidays.
- 3.6. As those with a SmartPass would need to pay to travel before 09:30, the change may have the unintended consequence of impacting those in low-paid roles that require early morning shifts or impacting on those that have caring responsibilities (mainly women). It would also impact on those who use their SmartPass to attend early medical appointments.
- 3.7. The policy could also run contrary to other government aims or have unintended consequences for people with disabilities. For example, restricting use to off-peak times could act as a disincentive for disabled people (who have much lower rates of economic activity than the general population) to gain and stay in employment.

3.8. The Inclusive Mobility and Transport Advisory Committee has advised that, as Northern Ireland already has the largest employment gap between disabled people and non-disabled people, peak time restrictions on concessionary travel could potentially worsen this gap.²⁹ This impact could be greater for people with disabilities living in rural areas where off peak services may be more infrequent than in urban areas.

Question 5: Do you think SmartPass users who hold an age-related SmartPass (60+ or Senior (65+)) should be able to use their SmartPass before 09:30?

Yes

No

Question 6: Do you think SmartPass users who hold a disability-related SmartPass should be able to use their SmartPass before 09:30?

Yes

No

Question 7: If you hold a SmartPass and could not use it before 09:30 on a weekday, how would you make your journeys the majority of the time? (Select one)

I would make my journey after 09:30 using my SmartPass

²⁹ The Inclusive Mobility and Advisory Committee (IMTAC) – Briefing to the Department for Infrastructure on the Concessionary Fares Scheme – March 2023

- I would still travel by public transport before 09:30 and pay a fare
- I would still travel before 09:30 but I would walk, wheel or cycle
- I would still travel before 09:30 but I would travel by car
- I would not make my journey

Other - please specify:

Question 8: If you wish to provide comments supporting your answers, please do so below.

4. OPTION 3 – LIMITING SMARTPASS USE TO BUS ONLY TRAVEL

Background

- 4.1. In Northern Ireland, SmartPass holders can travel on both bus and rail. This is more generous than some other jurisdictions where free travel is available on bus only (although discounts are available on rail in some areas).

Mode of Transport Restriction by Country or Region

Country/Region	Mode of transport
Northern Ireland	Free and discounted travel on both bus and rail
England*	Free bus travel (discounts on rail but part of separate schemes)
Scotland	Free bus travel (discounts on rail)
Wales	Free bus travel (discounts on rail)
Republic of Ireland	Free travel on both bus and rail

- 4.2. Data below shows the percentage of concessionary fares journeys made by bus and rail in 2018/19 and the costs of travel.³⁰

	Percentage of concessionary journeys	Percentage of overall costs
Bus	82%	64%
Rail	18%	34%

Proposal

- 4.3. One option to reduce the cost of the Scheme would be to allow SmartPass users to travel on bus only. This is because a rail journey is more expensive than a bus journey and so providing concessionary travel on rail costs more.
- 4.4. As not all SmartPass users have easy access to rail travel, the change would only impact on some SmartPass users, depending on where they reside or how they travel. Furthermore, for all rail routes a bus service is also available, therefore, there will be an alternative option for SmartPass users to make their journey.

³⁰ DfI Management Information. These figures reflect the costs reimbursed by the Department to operators participating in the Scheme and are extracted from the Departmental General Ledger. The expenditure is audited by external consultants and NIAO and is reflected in the Departmental Accounts.

- 4.5. However, restricting use of the SmartPass to bus only, may have a significant negative impact on some groups. The Inclusive Mobility and Transport Advisory Committee has advised that the feedback it has received from many disabled people and older people is that rail travel is more accessible than bus. This may mean that the proposal would have a negative impact on some disabled SmartPass users, particularly those with guide dogs or with large wheelchairs who can find the bus difficult to use.
- 4.6. This option may also mean that rather than decide to travel by bus, some people may choose to travel by car, running contrary to the Department's ambitions around climate change and potentially having a negative impact on economic growth. Others may choose not to travel at all which may increase their risk of social exclusion.

Question 9: Do you think SmartPass users who hold an age-related SmartPass (60+ or Senior (65+)) should be able to use their pass on rail?

Yes

No

Question 10: Do you think SmartPass users who hold a disability-related SmartPass should be able to use their pass on rail?

Yes

No

Question 11: If you hold a SmartPass and could not use it on rail, how would you make your journeys the majority of the time? (Select one answer)

- It would not affect me as I use my SmartPass on bus when I travel by public transport
- I would still travel by rail and pay a fare
- I would still travel with my SmartPass but I would make my journey by bus instead of rail
- I would walk, wheel or cycle
- I would travel by car
- I would not make my journey

Other - please specify:

Question 12: If you wish to provide comments supporting your answers, please do so below.

5. OPTION 4 – APPLICATION, RENEWAL, AND REPLACEMENT FEES

Background

- 5.1. In Northern Ireland, applicants to the Scheme are not charged for the production or renewal of their SmartPass, even if the card has been lost or misplaced.
- 5.2. In England, Scotland and Wales, applicants are not charged when applying for a pass but some local authorities in England charge a fee (usually £5 or £10) to replace cards lost or stolen.
- 5.3. SmartPasses are valid for a period of five years and cannot be used to obtain free travel after the expiry date. SmartPass holders receive a letter around three months before the card's expiration date, explaining how to apply to renew their pass. A new SmartPass will then be issued on receipt of a renewal application.
- 5.4. Applications and renewals of SmartPasses are processed by Translink on the Department's behalf. The Department pays Translink a standard rate for each pass issued. The administration costs accounted for 1.2% of overall Scheme costs in 2018/19.

Proposal

- 5.5. An option to help protect the Scheme (by reducing the amount of money the Department spends on it) is to introduce an application, renewal, and replacement fee.
- 5.6. 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.
- 5.7. Charging for services relieves the general taxpayer of costs, so that they are borne by users who benefit from a service. Charging an application, renewal, and replacement fee to SmartPass users,

therefore, may allow for a more equitable distribution of public resources and can help protect the existing Scheme.

- 5.8. 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. This is likely to be in the region of £5 - £10 for each card issued.

Question 13: Do you think that the Department should introduce a fee for a SmartPass?

Yes

No

Question 14: If you wish to provide comments supporting your answer, please do so below.

PART B: OPTIONS TO PROMOTE SOCIAL INCLUSION

5.9. The following options are aimed at making the Scheme more targeted at those groups of people it is intended to reach. The implementation of these options will, in some cases, increase the costs of delivering the Scheme. The Department recognises that it is not currently in a position to implement these changes in light of the significant financial challenges being faced. However, at the same time, the Department also recognises that the Scheme may not be reaching all groups who are at risk of social exclusion. Therefore, we are consulting on these options now to inform decisions on future changes to the Scheme should the Department's budgetary position change.

6. OPTION 5 – FREE TRAVEL FOR THOSE CURRENTLY RECEIVING A HALF FARE CONCESSION DUE TO A QUALIFYING DISABILITY

Background

- 6.1. In Northern Ireland, a half fare concession is available for people who:
- get the mobility component of Personal Independence Payment (PIP)
 - have a recognised learning disability
 - are partially sighted (sight impaired)
 - have had a driving licence refused or revoked on medical grounds
- 6.2. Northern Ireland is the only location in United Kingdom and Ireland that does not provide free travel for disabled people.

Concession for people with qualifying disabilities by Country or Region

Country/Region	Concession
Northern Ireland	Half fare travel (50% discount off the standard adult single fare on bus and rail services)
England	Free travel
Scotland	Free travel
Wales	Free travel
Republic of Ireland	Free travel

- 6.3. Concessionary fares schemes provide for people with disabilities in recognition that this group faces challenges accessing transport because of their disability, whether due to mobility, financial or other reasons. This puts them at greater risk of social exclusion than those without a disability.
- 6.4. Despite their higher risk of social exclusion, the concession provided under the Scheme is a half fare concession, whereas people who are registered blind, receive a war disablement pension, or are over 60, are entitled to free travel. This creates anomalies as some disabled people potentially face greater challenges accessing transport, and therefore participating in society, than those currently receiving a full fare discount.
- 6.5. For example, people who are partially sighted are likely to have similar challenges accessing transport as those who are registered blind, and those who have had their driving licence refused on medical grounds may have more challenges accessing transport than someone over 60 who may have access to a private car.
- 6.6. Additionally, due to the Scheme's audit and fraud requirements, the Half Fare SmartPass cannot be used for return or weekly tickets or special promotions which are discounted commercial products offered by Translink. Therefore, it can sometimes be better value for a Half Fare SmartPass user to purchase these types of tickets rather than use their SmartPass.

Proposal

- 6.7. One option to ensure the Scheme is targeted at those most at risk of social exclusion is to provide free travel to everyone with a qualifying disability. This means that everyone who is currently eligible for a half fare concession would receive free travel.
- 6.8. This potential change was announced by Minister Mallon in 2022 but has not been implemented due to the current budget situation.³¹
- 6.9. Increasing half fare travel to free travel for those with qualifying disabilities targets those at higher risk of social exclusion who may be most reliant on public transport and who may benefit most from access to free bus and rail travel.
- 6.10. Free public transport has the potential to increase access to training and employment opportunities, key services, and social networks for people with disabilities. Widening participation in this way is consistent with the Department's duty to promote equality of opportunities for people with disabilities and widen their participation in public life, as well as promoting greater accessibility for disabled people, as set out Article 9 of the UN Convention on the Rights of Persons with disabilities.

Question 15: Do you think the half fare concession should be extended to free transport for people with a qualifying disability?

Yes

No

³¹ <https://www.infrastructure-ni.gov.uk/news/mallon-signals-her-intention-seek-approval-extend-concessionary-fares-scheme#:~:text=Minister%20Mallon%20wishes%20to%20provide,expressed%20an%20interest%20in%20joining.>

Question 16: If you wish to provide comments supporting your answer, please do so below.

7. OPTION 6 – COMPANION PASSES FOR DISABLED PEOPLE UNABLE TO TRAVEL ALONE

Background

- 7.1. Currently, people with qualifying disabilities receive concessionary travel, however, those travelling with the person must still pay a fare, even if the disabled person cannot travel on their own for a reason related to their disability.
- 7.2. Companions can make travel much easier for disabled people who have difficulty travelling on their own, helping them to get on and off buses, carrying shopping and communicating with the driver.
- 7.3. In some other countries concessionary travel is provided for companions:

Companion Travel Provision by Country or Region

Country/Region	Companion travel available
Northern Ireland	No
England*	No
Scotland	Yes – some older and disabled people qualify for a companion pass (criteria applies)

Wales	Yes – some disabled people qualify for a companion pass (criteria applies)
Republic of Ireland	Yes – some older and disabled people qualify for a companion pass (criteria applies)

* Companion travel is not provided for under the statutory concession. However, **local authorities may provide further concessions** in accordance with their local priorities – some local authorities allow companion travel (e.g., Bristol), but this is at their own discretion.

- 7.4. In other jurisdictions, to qualify for a companion pass, a person needs to meet a specific set of criteria. For example, in Scotland, eligibility for companion travel is linked to the receipt of specified benefits e.g., those in receipt of Attendance Allowance are eligible for companion travel.

Proposal

- 7.5. One of the options to help tackle the social exclusion of people with disabilities is to introduce companion passes. This would mean that, if a person is disabled **and** they are unable to travel alone, they may be entitled to a companion pass.
- 7.6. For the avoidance of doubt, companions are not themselves issued with a concessionary travel pass. The person with disabilities is issued with a pass which indicates that they are allowed to have a companion travel with them on their journey. This companion pass allows the companion to receive concessionary travel for that journey.
- 7.7. Companion entitlement will not be routinely issued to disabled concessionary travel pass holders. It will be provided in cases when the disabled person requires extra help that a companion can provide to enable them to travel by public transport.
- 7.8. A person would be able to change their companion (for example, travel with their wife for one trip but daughter for another trip), but their companion would only be entitled to concessionary travel when they are travelling with the disabled person. A disabled

person with a companion pass will not be obliged to travel with a companion, but the entitlement will be there for when they need it.

- 7.9. The Department will need to give further consideration as to how companion travel, if introduced in Northern Ireland, would work, including the eligibility criteria that would apply, how proof of eligibility would be provided, and whether companion passes would be available for eligible disabled people of any age (including children under 5).

Question 17: Do you think that disabled people who have difficulties using public transport should be entitled to have someone travel with them on their SmartPass?

Yes

No

Question 18: If you wish to provide comments supporting your answer, including opinions on how this proposal could work in Northern Ireland and potential eligibility criteria, please do so below.

8. OPTION 7 – EXTEND THE QUALIFYING CRITERIA FOR A HALF FARE SMARTPASS IN LINE WITH OTHER JURISDICTIONS

Background

- 8.1. Currently, Half Fare SmartPasses are issued to disabled people who qualify under the Scheme. To qualify for a Half Fare SmartPass the person must:
- be in receipt of mobility component of Personal Independence Payment (PIP)
 - have a recognised learning disability
 - be partially sighted (sight impaired)
 - have had a driving licence refused or revoked on medical grounds
- 8.2. In other UK jurisdictions, the criteria to qualify for a concessionary travel pass on disability grounds is wider, for example, it includes those who are unable to speak, those with profound hearing loss, those with a Blue Badge, those who have lost both arms, and those receiving the higher or middle rate of the care component of Disability Living Allowance. The full list of qualifying disabilities in England, Scotland and Wales is provided in Annex B.
- 8.3. In Northern Ireland, if you have one of these qualifying disabilities listed in other jurisdictions, you may still be eligible for a SmartPass even though the disability is not listed as one of the qualifying criteria for the Scheme. This is because your condition may mean you are eligible for the mobility component of PIP and therefore eligible for a SmartPass. For example, holding a Blue Badge is not listed as a qualifying criterion for a SmartPass but someone who has a Blue Badge may be in receipt of the mobility component of PIP and so can apply for a SmartPass.
- 8.4. However, it may be the case that this does not apply in all circumstances e.g., perhaps not all of those who hold a Blue Badge would qualify for the mobility component of PIP and therefore not all Blue Badge holders would be eligible for a SmartPass despite all Blue Badge holders being equally at risk of social exclusion.

- 8.5. There are also some other qualifying criteria in other jurisdictions that may not make an individual eligible for the mobility component of PIP, e.g., being without speech.
- 8.6. Additionally, some people may have hidden disabilities e.g., having autism, which means that they may not qualify for the mobility component of PIP. These groups of people may be at risk of social exclusion but as they do not qualify for the mobility component of PIP, they would not be eligible for a SmartPass under the current eligibility criteria.

Proposal

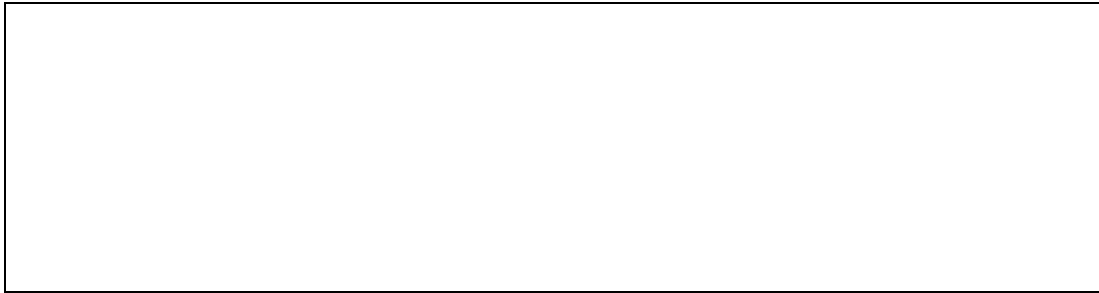
- 8.7. One of the options to help tackle the social exclusion of people with disabilities is to widen the qualifying criteria for a SmartPass on the grounds of disability to align it more closely with other UK jurisdictions. Extending the qualifying criteria would help ensure the Scheme is targeted at those groups of people it is intended to reach.
- 8.8. The Department will need to give further consideration as to the additional eligibility criteria that may apply in Northern Ireland and how proof of eligibility would be provided.

Question 19: Do you think that the qualifying criteria for a SmartPass on the grounds of disability should be widened in line with other UK jurisdictions?

Yes

No

Question 20: If you wish to provide comments supporting your answer, including opinions on any changes that should be made to the current eligibility criteria for a Half Fare SmartPass, please do so below.



9. OPTION 8 – FREE TRANSPORT FOR THOSE RECEIVING ASYLUM SUPPORT AND VICTIMS OF HUMAN TRAFFICKING

Background

- 9.1. Asylum seekers come from countries affected by conflict and violence, such as Syria and states undergoing political turmoil and human rights abuses. Having fled their country, they often arrive with few possessions and, as the majority usually have no right to work, rely on the Home Office and/or charities for support.
- 9.2. The Home Office has a statutory duty to provide support to destitute asylum seekers. There are different types of asylum support that the Home Office provides, depending on the stage of the asylum process a person is in. Asylum support is provided under section 98 (while their claim for support is being assessed), section 95 (while waiting for an asylum decision) or section 4 (after an asylum claim has been rejected or declared inadmissible) of the Immigration and Asylum Act 1999. Depending on a person's circumstances, this support can include housing and/or basic living expenses (money).
- 9.3. Most asylum seekers receive financial support of around £45 per week. From this, asylum seekers need to pay for all expenses, including food, clothing, communication, travel, and necessities.³² Asylum Seekers in catered accommodation are issued a weekly

³² For those living in catered accommodation, nappies and essential toiletries and feminine hygiene products are to be supplied as part of the provider's contract with Home Office. Those living in accommodation other than catered accommodation with full board service would have to buy these items from their weekly allowance.

payment of £9.10 to cover essential living items that are not met by their accommodation provider (clothing, non-prescription medicine and travel).

- 9.4. Due to their limited financial means, the cost of public transport is prohibitive for most asylum seekers who often have no choice but to walk long distances to attend mandatory appointments, collect children from school, or visit the GP. Additionally, lack of access to public transport can mean that some asylum seekers find it difficult to access English classes or educational courses, volunteering activities, and other community or social opportunities, leaving them unable to integrate into their new communities and at risk of social exclusion.
- 9.5. Under the current Scheme, asylum seekers are only entitled to a SmartPass if they fall within one of the existing concessionary fares categories e.g., if they are over 60 or have a qualifying disability. In practice, the evidential requirements effectively exclude most applicants from the Scheme.
- 9.6. Currently, there are around 3,000 asylum seekers in Northern Ireland. Until recently, the majority of asylum seekers have been accommodated in the Belfast council area. Asylum seekers are now being accommodated in other council areas. As a number of specialist services are only available in Belfast, this makes the need for accessible public transport even more important.
- 9.7. Another group who are particularly vulnerable and who would benefit from access to free travel are victims of human trafficking. Human trafficking is a form of modern-day slavery³³ in which victims are subjected to force, fraud, or coercion for the purpose of commercial sex, debt bondage, or involuntary labour. Victims of human trafficking can be young children, teenagers, men, and women.

³³ Modern slavery is a term that includes any form of human trafficking, slavery, servitude or forced labour, as set out in the Modern Slavery Act 2015.

- 9.8. 547 people were potentially trafficked into Northern Ireland last year (2022)³⁴, according to recent Home Office statistics, an increase of 50% on 2021, when the figure was 363.
- 9.9. Many, but not all, potential victims of human trafficking will have a concurrent asylum claim. However, there will be a small cohort of victims who do not and therefore will not be captured if the Scheme only extends to asylum seekers.
- 9.10. To be recognised by the Home Office as a victim of trafficking, a person has to be referred to the National Referral Mechanism (NRM). The NRM is the process, managed by the UK Home Office, that identifies victims and ensures they can access appropriate support.
- 9.11. The first stage in the process is called a “reasonable grounds decision,” which is an initial decision on whether it is likely that the person is a victim of human trafficking. A “conclusive grounds decision” is confirmation that the person is a victim of human trafficking. Following a positive conclusive grounds decision, the person may be eligible to apply for discretionary leave to remain in the country.

Proposal

- 9.12. As the aim of the Scheme is to target those at most risk of social exclusion, one option for change would be to 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 children) receiving such support would be eligible for a SmartPass.
- 9.13. We are still considering how this proposal could work in practice. One option could be to provide those eligible with a SmartPass for a time limited period (for example six months).³⁵ At the end of the

³⁴ <https://www.gov.uk/government/statistics/modern-slavery-national-referral-mechanism-and-duty-to-notify-statistics-uk-end-of-year-summary-2022/modern-slavery-national-referral-mechanism-and-duty-to-notify-statistics-uk-end-of-year-summary-2022#introduction>

³⁵ This is based on Home Office statistics regarding the granting of application - Of the 14,500 applications that received an initial decision in 2021, 4% received their decision within 6 months, 19% within a year, and 53% took at least 1.5 years to receive an initial Home Office decision.

six-month period, the asylum seeker or victim of human trafficking would be required to prove that they are still eligible for a SmartPass to have the pass extended.

- 9.14. For victims of human trafficking, one option to prove eligibility may be to require a letter from an agreed list of organisations confirming that the person is within the NRM, has received a positive Conclusive Grounds decision and has applied for a Residence Permit. We are engaging with the Home Office and support organisations representing asylum seekers on the proofs that asylum seekers would need to provide to be eligible for the Scheme. In both circumstances, the applicant would be required to sign a consent form stating that they are required to notify Translink if their circumstances change.
- 9.15. Before introducing the change, consideration would need to be given as to whether providing these groups free travel would impact on any other support they receive.

Question 21: Do you think the Concessionary Fares Scheme should be extended to include free transport for asylum seekers receiving asylum support and victims of human trafficking?

Yes

No

Question 22: If you wish to provide comments supporting your answer, including opinions on how you think this proposal could work in Northern Ireland, please do so below.

10. OPTION 9 - CHANGES TO THE RESIDENCE TEST

Background

- 10.1. In Northern Ireland, there are a number of different SmartPasses that people can apply for. To apply for one of these passes, a person must prove they have been *permanently resident* in Northern Ireland *for a period of 3 months*.
- 10.2. This rule was introduced to stop visitors to Northern Ireland from applying for a SmartPass. However, some stakeholders have highlighted that it disadvantages some groups of people who are new to Northern Ireland, but who intend to reside here, such as foreign nationals.
- 10.3. This means that those foreign nationals who are eligible for concessionary fares, on age or disability grounds, need to wait at least three months after entering Northern Ireland before applying for a SmartPass, during which time they could be at risk of social exclusion. This is not the case in other parts of the UK or in the Republic of Ireland.
- 10.4. In other jurisdictions, different residence tests assess whether a person is eligible for a concessionary travel pass (which is similar to a SmartPass in Northern Ireland). None of these tests include a condition that a resident is here *permanently for a period of 3 months*.

Residence test by Country or Region

Country/Region	Residence Test
Northern Ireland	Permanently Resident for 3 months
England	Sole or principal residence in the authority's area
Scotland	Resident of Scotland
Wales	Primary residence is in Wales
Republic of Ireland	Legally and permanently residing in the State on an all-year-round basis

Proposal

- 10.5. One option to make the Scheme more accessible to those who are already entitled to apply, is to change the residence test by removing the need for applicants to be permanently resident in Northern Ireland for a period of three months and replacing it with the 'primary residence'³⁶ test.
- 10.6. This would mean that those people who reside, or intend to reside, in Northern Ireland most of the time would be able to apply, while visitors to Northern Ireland would not. Applicants would be asked to sign a declaration that Northern Ireland is their primary residence.

Question 23: Do you think the current residency test for a SmartPass (3 months permanent residence) should be replaced by a different test (e.g., primary residence) to make it more accessible to all Northern Ireland residents?

Yes

No

³⁶ The Department would adopt an 'ordinary' reading of the term 'residence'. This is because technically asylum seekers are not 'residents' for purpose of immigration law

Question 24: If you wish to provide comments supporting your answer, please do so below.

11. OPTION 10 - PROVING RESIDENCY

Background

- 11.1. In Northern Ireland, when a person applies for a SmartPass, they must prove their residency by providing one of the following:
- driving licence (non-UK driving licences must contain a person’s Northern Ireland address)
 - recent (no more than three months old) utility bill (an electricity, gas, or landline telephone bill, but not a mobile phone bill)
 - recent (no more than three months old) bank or building society statement
 - Northern Ireland Electoral ID Card³⁷
- 11.2. While many applicants are likely to hold these documents, stakeholders, such as the Law Centre, have advised that they are unlikely to be held by some groups of people. This means that some residents who are entitled to concessionary fares because of age or disability may find it difficult to apply for the Scheme. This includes asylum seekers and other foreign nationals who have relocated to Northern Ireland on a permanent basis.
- 11.3. In 2021, the Department introduced a pilot aimed at improving access to the Scheme for asylum seekers who may have difficulty providing evidence of age/ residency. This pilot was designed to help eligible asylum seekers to access the Scheme.

³⁷ In turn, SmartPasses are accepted at Northern Ireland polling stations as proof of identity.

- 11.4. This pilot proved very successful, with 20 asylum seekers receiving SmartPasses since the pilot was introduced. However, it would be simpler and more cost effective if the existing list of proofs were widened and accepted on a permanent basis to make sure that older and disabled asylum seekers, and any other eligible Northern Ireland residents who may have difficulty providing the current proofs, can apply more easily.
- 11.5. In other jurisdictions, the list of proofs accepted to prove residency is not as restrictive as it is here. For example, in Wales, authorities are advised to consider a mix of documentation as proof of residency when assessing a concessionary fares application. This includes evidence that the applicant has a permanent registration with a local GP or evidence of Home Office documentation confirming residency.
- 11.6. Adopting a similar approach here, by widening the list of proofs, could help remove barriers to accessing the Scheme for traditionally marginalised groups, such as homeless people with a disability.

Proposal

- 11.7. One option to make the Scheme more accessible to those who are already entitled to apply is to review the list of documentation that can be used to prove residency.
- 11.8. The list would be reviewed to ensure that it is open to everyone on an equal basis and to remove the barriers to access faced by some groups who are likely to face social exclusion. For example, a more extensive list of proofs might include:
- Evidence that the applicant is in the care of the local authority or an approved agency;
 - Evidence that the applicant has a permanent registration with a local G.P;
 - Evidence of Home Office documentation confirming residency;

- Evidence a person is in receipt of state benefits or a letter from their local job centre or some other agency (e.g., the Probation Service) to support an application for a concessionary travel pass.

Question 25: Do you think the list of proofs should be widened to make the Scheme more accessible to those older and disabled people who are already entitled to apply?

Yes

No

Question 26: If you wish to provide comments supporting your answer, please do so below.

12. ABOUT YOU (REQUIRED)

- 12.1. Please indicate how you wish your response to be handled and, in particular, whether you are content for your response to be published. If you ask for your response not to be published, we will still take account of your views in our analysis, but we will not publish your response, quote anything that you have said or list your name. We will regard your response as confidential, and we will treat it accordingly.
- 12.2. To find out how we handle your personal data, please see our privacy policy. This is available on the consultation website. By submitting your response, you will be agreeing to our privacy policy.

Question 27: What is your name?

Question 28: What is your e-mail address

Question 29: Are you responding as an individual or organisation?

Individual

Organisation

Question 30: If responding on behalf of an organisation, please enter the organisation's name here.

Question 31: The Department for Infrastructure would like your permission to publish your consultation response. Please indicate your publishing preference (Required)

Publish response with name

Publish response only without name

Do not publish response

Information for organisations only:

The option 'Publish response only (without name)' refers only to your name, not your organisation's name. If this option is selected, the organisation's name will still be published.

If you choose the option 'Do not publish response', your organisation's name may still be listed as having responded to the consultation in, for example, the analysis report.

Question 32: We may wish to contact you again regarding your response, but we require your permission to do so. Are you content for the Department for Infrastructure to contact you again in relation to this consultation exercise (Required)

Yes

No

13. INFORMATION TO HELP US ANALYSE YOUR RESPONSE (INDIVIDUAL RESPONSES ONLY)

13.1. The Department for Infrastructure is committed to ensuring that our policies, services, and practices are fair, free from discrimination and meet the needs of everyone in our community. To help us to do this, if you are replying to this consultation as an individual, we would be grateful if you could answer the questions below. You are under no obligation to answer any of these questions, but it would help us greatly if you do so.

Question 33: Please enter the first four digits of your postcode

Question 34: What is your sex?

Male

Female

**Question 35: Which of the following age bands do you fall into?
Please tick**

10-19

20-29

30-39

40-49

50-59

60-69

70-79

80+

Question 36: Do you have any physical or mental health conditions or illnesses that have lasted or are likely to last, for 12 months or more?

Yes

No

Question 37: If you have answered yes, please tick the definitions that best describe your impairments? (Tick all that apply)

Learning disability / difficulty

Long standing illness or health condition

Mental health condition

Physical or mobility impairment

Sensory impairment

Neurodivergent e.g., an autistic person

Hidden or invisible impairment (e.g., cancer, HIV, diabetes, chronic heart disease or epilepsy)

Question 38: Which of these best describes your employment status? (Tick one option)

Employed full time (30 or more hours per week)

Employed part time (less than 30 hours per week)

Zero hours contract

Seasonal worker

Self-employed or company director

Unemployed and looking for work

Retired

Other - please specify:

Question 39: Do you have a SmartPass?

Yes

No

Question 40: If yes, what type of SmartPass do you have? Tick one

Senior (65+)

60+

War disablement

Registered blind

Disability (half fare)

Question 41: What is the main reason you use your SmartPass? Tick one

Travel to work

Travel to school/college/university

Appointments

Shopping trips

Visiting family, friend, or socialising

Tourism

Other - please specify:

Question 42: How often do you usually use your SmartPass?

6-7 days a week

4-5 days a week

2-3 days a week

One day a week

2-3 days per month

Once a month

Less often

I never use my SMARTpass

14. COMMENTS ON THE DRAFT EQIA

- 14.1. Following screening, the equality impacts of the various options have been further assessed in a draft Equality Impact Assessment (EQIA), which is available on our website.
- 14.2. We will be engaging with stakeholders throughout the consultation process on the draft EQIA on an ongoing basis to identify any potential mitigations that can be made to lessen the negative impact of the proposals or to better promote equality of opportunity and good relations.

Question 43: If you wish to provide comments on the draft EQIA, please do so below.

ANNEX A: FINANCIAL IMPLICATIONS OF OPTIONS

The estimates of savings / costs associated with the options in this consultation are best estimates and recognise that any savings / costs are within a broad range. The difficulties in accurately estimated costs include lack of information in relation to behaviour. As an example, if train travel is not included in the Concessionary Fares Scheme, we cannot accurately determine how many people would choose to travel by bus, how many would stop travelling and how many would continue to use the train and pay for their journey. The effects of this behaviour change would also have an impact on the fares received by Translink and ultimately the subsidy that needs to be provided to Translink by the Department for delivering bus and train services.

In setting out the range of costs / savings we are therefore providing best available information to allow the relative impact of each option to be considered as you respond to this consultation.

Cost estimates are based on the forecast costs for 2023/24.

Option	Potential number of people impacted	Forecast cost for 2023/24	Estimated increased cost 24/25	Estimated decreased cost 24/25
1A. Do nothing	368,302	£44.57m	£2.7m	
1B and IC. Remove free travel from 60-64 age group/link to State Pension Age	70,240	£8.7m		£4.1m-£5.1m
2. Restrict concessionary travel to off-peak only	368,302	N/A		£0.6m
3. Restrict concessionary travel to bus only	368,302	N/A		£2.8m
4. Introduce a fee for application/renewal/replacement of the SmartPass	Assumption of 64,400 applications for new or renewal cards a year	N/A		£0.6m
5. Increase half fare concession to full fare concessions for people with disabilities	13,476	£0.95m	£1.1m	
6. Introduce free travel for a companion travelling with a disabled person	N/A	N/A	£0.7m	

Option	Potential number of people impacted	Forecast cost for 2023/24	Estimated increased cost 24/25	Estimated decreased cost 24/25
7. Extend the eligibility criteria for a disabled persons SmartPass in line with other UK jurisdictions	N/A	N/A	Impact will depend on agreed changes	
8. Introduce free travel for asylum seekers and victims of human trafficking	Approx. 3000 asylum seekers in Northern Ireland	N/A	Impact will depend on travel behaviour. If option is to be progressed a pilot will be considered to better assess cost	
9. Remove the three-month residency condition	Minimal	N/A	Minimal impact as it would only apply to a very small number of people and does not change the current rules on eligibility	
10. Widen the list of proofs	Minimal	N/A	Minimal impact as it would only apply to a very small number of people and does not change the current rules on eligibility	

ANNEX B: ELIGIBILITY CRITERIA FOR CONCESSIONARY TRAVEL FOR PEOPLE WITH DISABILITIES

Scotland

1. Live in a care/residential home or hospital and are eligible for:
 - a. Attendance Allowance.
 - b. Personal Independence Payment.
 - c. Adult Disability Payment.
 - d. Pension Age Disability Payment.
 - e. Disability Living Allowance (higher or middle rate of the care component).
 - f. Child Disability Payment (higher or middle rate of the care component).
2. You receive a qualifying DWP benefit:
 - a. Attendance Allowance.
 - b. Personal Independence Payment.
 - c. War Pension Constant Attendance Allowance.
 - d. Disability Living Allowance (higher rate of mobility component or higher or middle rate of the care component).
3. You receive a qualifying Social Security Scotland benefit:
 - a. Pension Age Disability Payment.
 - b. Adult Disability Payment.
 - c. Child Disability Payment (higher or middle rate of the care component).
4. Are a blue badge holder.

5. Are profoundly or severely deaf.
6. Have a sight impairment.
7. Have been told not to drive on medical grounds.
8. Have a mental health condition recognised under the Mental Health (Care and Treatment) (Scotland) Act 2003 which has lasted more than a year. You must need to travel to health or social care appointments as part of treatment activities, care, or a rehabilitation programme. Your ability to travel must also be impaired.
9. You have a learning disability.
10. You have a terminal illness. Need to show you qualify for 2d, 3c, 2b, 2a, 3b, 3a or letter you are registered on a Scottish hospice register.
11. You have a progressive degenerative condition that severely impedes your mobility.
12. You have lost one or more limbs – one or both legs, both arms or an arm and a leg
13. You are an injured veteran with mobility problems.
14. You receive a War Pensioner Mobility Supplement.

Wales

1. Receive one of the following benefits:
 - a. Disability Living Allowance (higher rate of mobility component)
 - b. PIP award which shows
 - i. 8 or more points under Descriptor 7 – communicating verbally; or
 - ii. 12 points under Descriptor 11 – planning and following a journey; or

- iii. 8 or more points under Descriptor 12 – moving around.
 - c. Veterans UK Agency War Pensioners Mobility Supplement
 - d. Ministry of Defence award letter under tariffs 1-8 of the Armed Forces Compensation Scheme
2. Have a high degree of sight loss in both eyes, severely sight impaired, slight sight impaired.
 3. Profoundly or severely deaf.
 4. Cannot speak.
 5. An impairment or injury that has a substantial long term adverse effect on ability to walk.
 6. Without arms or long-term loss of the use of both arms.
 7. A cognitive impairment.
 8. Would be refused a driving licence.

England

1. Is blind or partially sighted.
2. Is profoundly or severely deaf.
3. Is without speech.
4. Has a disability, or has suffered an injury, which has a substantial and long-term adverse effect on his or her ability to walk.
5. Does not have arms or has long-term loss of the use of both arms.
6. Has a learning disability.
7. Would be refused a driving licence.