



# Consultation on changes to the Concessionary Fares Scheme

Response by the Consumer Council

24 August 2023

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## 1. EXECUTIVE SUMMARY

The role of the Consumer Council is to promote and safeguard the interests of all consumers in Northern Ireland. We welcome the opportunity to respond to this consultation.

The Consumer Council does not support changes to the Scheme as outlined in Part A, which have the potential to reduce the number of journeys taken by public transport and increase social exclusion. We fully support the proposals in Part B which will encourage more people to use public transport and further tackle social exclusion.

We appreciate that this consultation has been published at a time of significant pressures on public finances in Northern Ireland and that the Department for Infrastructure (“the Department”) has been tasked with finding ways to make significant cost savings. However, we believe that the Concessionary Fares Scheme (“the Scheme”) should not be subject to a cut in budget as it is crucial to driving a just transition to net zero by supporting a modal shift from private car use to public transport.

The Department should be looking at the Scheme as a way of increasing the number of people using public transport by prioritising those most at risk of social exclusion.

Our full response is set out in Section 3. In summary:

- The Scheme should be refreshed and refocused on increasing the use of public transport with the twin objectives of:
  - a) Reducing Northern Ireland’s transport carbon emissions; and
  - b) Promoting social inclusion.
- With no guarantee that anyone who lost entitlement to the Scheme would continue to use public transport at full fare, the impact on Translink of losing an overall revenue stream of £9.4m could force Translink to reduce essential services to the detriment of all public transport users.
- The Scheme can help achieve both a modal shift to public transport and tackle social exclusion by supporting the most vulnerable groups to access it.
- We strongly support the proposal to extend the half-fare concession for disabled people to a full fare concession along with a widened criteria, and for the full fare concession to include a person accompanying a disabled person, asylum seekers and victims of human trafficking.
- We believe that any change that would cut the Scheme to bus or off-peak hours only would have a detrimental impact on the well-being of disabled and rural consumers.

The consultation questions are listed at Appendix 1. We would welcome the opportunity to meet the Department to discuss our response.

## 2. ABOUT US

The Consumer Council is a non-departmental public body (NDPB) established through the General Consumer Council (Northern Ireland) Order (The Order) 1984. Our principal statutory duty is to promote and safeguard the interests of consumers in Northern Ireland.

We are an insight-led, evidence based organisation:

- Providing consumers with expert advice and confidential guidance.
- Engaging with government, regulators and consumer bodies to influence public policy.
- Empowering consumers with the information and tools to build confidence and knowledge.
- Investigating and resolving consumer complaints under statutory and non-statutory functions.
- Undertaking best practice research to identify and quantify emerging risks to consumers.
- Campaigning for market reform as an advocate for consumer choice and protection.

We have specific statutory duties in relation to energy, postal services, transport, water and sewerage, and food affordability and accessibility. These include considering consumer complaints and enquiries, carrying out research, and educating and informing consumers.

Our non-statutory functions educate and empower consumers against unfair or discriminatory practices from financial services to private parking charge notices. Our interpretation of The Order gives us powers to tackle financial exclusion in Northern Ireland by working with The Executive, UK Government and regulators to influence policy and empower consumers through education and increased awareness.

Article 5(1) of the Order requires the Consumer Council to: “consider and, where it appears to it to be desirable, make recommendations with respect to any matter affecting road or railway passenger transport services and facilities in Northern Ireland and services and facilities provided for passengers travelling to and from Northern Ireland.”

We undertake this function by working in partnership with the NI Government, Translink, Northern Ireland air and ferry port operators, airlines, ferry companies and other stakeholder organisations. We handle complaints against transport service operators and use these, along with research, to inform our recommendations.

We are a designated super-complaints body set up under the Enterprise Act 2002 and the Financial Services and Markets Act 2000 Order 2013. Under both these Acts, the Consumer Council can, if we believe a market in UK is, or appears to be, significantly harming the interests of consumers, raise a super-complaint on behalf of consumers to a number of regulators including the Civil Aviation Authority (CAA).

We are also a designated body under the Rural Needs Act 2016 and Section 75 of the Northern Ireland Act 1998. In this role, we aim to ensure government policies recognise consumer needs in rural areas and promote equality of opportunity and good relations across a range of equality categories. Across all our areas of work, we pay particular regard to consumers:

- who are disabled or chronically sick;
- who are of pensionable age;
- who are on low incomes; and
- who live in rural areas.

We use a set of eight guiding principles (Figure 1) developed by the United Nations to:

- assess where the consumer interest lies; and
- develop and communicate our policies, interventions and support.

These provide an agreed framework through which we approach regulatory and policy work.

**Figure 1: Guiding Principles**



The principles ensure we apply a consistent approach across our statutory and non-statutory functions, and in all our engagement with consumers and stakeholders.

They serve and protect consumers and set out the minimum standards expected from markets when delivering products or services, including in digital markets, in Northern Ireland. They also frame our policy position and approach to resolving consumer disputes with industry, offering a straightforward checklist to analyse and validate outcomes, in particular vulnerable groups.

In considering the interests of consumers, (including those who are disabled or chronically sick, of pensionable age, low incomes and live in rural areas), we have viewed this consultation through the lens of four of the Consumer Principles:

- **Access** - can consumers get the goods and services they want?
- **Choice** - does the proposal provide a choice for consumers?
- **Fairness** - are some consumers unfairly discriminated against?
- **Safety** - does the proposal impact on consumer health, welfare or safety, or wider sustainability?

### 3. RESPONSE TO CONSULTATION

#### 3.1 Objectives of the Scheme

The original objective of the Scheme was:

‘To promote social inclusion by improving public transport accessibility through free and concessionary fares for members of the community who are most vulnerable, or liable to social exclusion.’<sup>1</sup>

To this end the Scheme was established in 1978<sup>2</sup> to provide free transport to people who were registered blind, and half fare travel to senior citizens and war disabled pensioners. In recognising the social benefits of public transport, the Scheme was extended to provide free travel for senior citizens (65+) in 2001, and in 2002, war disabled pensioners. The Scheme was further extended in 2004 to provide half fare concession for people with certain categories of disability, and since 2008 the Scheme has provided free travel for all men and women over 60 years old.

It is not surprising, given that the Scheme was established 45 years ago, that there is no reference in the original objective to promoting modal shift from the private car to public transport to address climate change. However, given the targets in the Northern Ireland Climate Change Act, the Department’s own acknowledgement that it must reprioritise to meet this new challenge and the widely accepted benefit that an increased use of public transport can make to reducing climate change, it is clear that the Scheme objectives need to be updated and refocused.

We believe the Scheme should be refreshed and refocus on increasing the use of public transport, with the twin objectives of:

- a) Reducing Northern Ireland’s transport carbon emissions; and
- b) Promoting social inclusion.

The Consumer Council suggests the overall objective of the Scheme be changed to:

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

#### 3.2 Climate Change

The Consumer Council Corporate Plan 2021-24 identifies decarbonisation as a key consumer priority.<sup>3</sup> Decarbonising Northern Ireland’s transport sector is important to not only assist in tackling climate change but also to improve air quality.

In Northern Ireland:

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<sup>1</sup> Equality Impact Assessment on The Northern Ireland Concessionary Fares Scheme, Department for Regional Development, April 2004.

<sup>2</sup> Transport (Northern Ireland) Order 1977, Article 5.

<sup>3</sup> [Consumer Council Corporate Plan 2021-24](#)

- Transport accounts for 20% total greenhouse gas emissions, and the biggest contributor is the private car.<sup>4</sup>
- Transport emissions rose by 3% in 2021 which was reflected most in private car use.<sup>5</sup>
- Most journeys continue to be made by private car (71%) whilst overall walking, cycling and public transport use has barely changed.<sup>6</sup>
- Around 900 deaths per year are attributable to air pollution.<sup>7</sup>

One of the key steps in the Department's commitment to reduce the carbon impact of transport is a shift of modes from private cars to public transport. Translink has committed itself to reduce emissions by 50% by 2030 and play a leading role in promoting zero emission transport. This includes promoting low emission Public Transport and Active Travel as an alternative to the private car.<sup>8</sup>

One way to encourage consumers away from private car use to public transport is to reduce or remove the cost to the individual passenger:

- In 2021, Consumer Council research conducted to examine barriers to transport recovery after COVID-19, consumers suggested that fares should be reduced to encourage more use of public transport to retain the environmental gains brought about by lower emissions during the pandemic.<sup>9</sup>
- The Department's own research has shown that 88% of concessionary pass users agreed that it increased their use of public transport.<sup>10</sup>
- Consumer Council research<sup>11</sup> indicated that 48% of those in the 55 to 64 age group expected their public transport usage to increase as they grew older and this is most likely due to people in this age group becoming eligible for the Scheme.

Therefore, the Consumer Council does not support changes to the Scheme that would potentially reduce the demand for public transport, particularly from consumers who may otherwise risk social exclusion. This has a positive implication for the Consumer Principle of Safety.

### 3.3 Funding

In the consultation document the Department acknowledges that it cannot be predicted if passengers who may potentially lose entitlement to concessionary fares would pay to use public transport. Any reduction in subsidy that could not be recouped by people continuing to pay for their journeys would in the first instance make a general public transport fare increase more likely. This would affect all existing Translink customers, but the group who lose the concessionary fare and continue to use public transport, either through choice or

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<sup>4</sup> <https://www.belfasttelegraph.co.uk/news/environment/climate-change-northern-irelands-love-affair-with-the-car-is-poisoning-very-air-we-breathe/41433769.html>

<sup>5</sup> <https://www.daera-ni.gov.uk/sites/default/files/publications/daera/NI%20Greenhouse%20Gas%20Statistics%201990-2021-Report.PDF>

<sup>6</sup> [The Travel Survey for Northern Ireland 2017-19](#)

<sup>7</sup> [Air Pollution and Mortality on the island of Ireland - TCD news](#)

<sup>8</sup> [Climate Positive Strategy \(translink.co.uk\)](https://www.translink.co.uk)

<sup>9</sup> [COVID-19 - Barriers to Recovery - Consumer Council Research](#)

<sup>10</sup> <https://www.infrastructure-ni.gov.uk/sites/default/files/publications/infrastructure/concessionary-fares-survey-report.pdf>

<sup>11</sup> [Older Persons Transport and COVID - Consumer Council research](#)

necessity, would face the “double whammy” of loss of the discounted fare at the same time as fare prices increase.

The Department secures public passenger transport provision from Translink under a Public Service Agreement (PSA), which states that funding should be maintained at such a level to ensure that the public service obligation activities performed by Translink enable it to maintain financial viability. The current subsidy assists in running a number of routes across the rail and rural network that are socially desirable but financially unviable.

We are concerned that if the funding for concessionary fares to Translink is cut, many of these routes and services would have to be stopped. Any cut to the concessionary fare subsidy will be a cut to the overall Translink revenue and a threat to public transport for all its users, not just those currently eligible for a concessionary fare.

The potential loss of subsidy should also be seen in the context of the level of funding of public transport in Northern Ireland being already considerably lower than the UK average. Furthermore, Translink does not have the same access to funding streams available elsewhere in the UK, for example the Bus Operators Grant.<sup>12</sup>

We therefore believe that any removal or reduction in the Concessionary Fares Scheme would have a detrimental impact on Translink’s funding. The potential consequences of this – fare increases and a reduction in overall services – would negatively impact consumers, risking more social exclusion and a decrease in public transport use.

## **PART A proposals**

For the reasons set out in Sections 3.4 to 3.7, we do not support the proposals set out in Part A of the consultation document that would remove or reduce entitlement to concessionary fares.

### **3.4 Age-related proposals**

Regarding the proposals to remove the Smart Pass from people aged between 60 and 64 or up to state pension age, we are concerned about the impact this may have on vulnerable consumers in this group that rely on public transport.

Whilst changes to the state pension age initially created more economically active people in this age group, this was reversed as a result of the COVID-19 pandemic when many over 50s gave up work permanently. A recent report from the Joseph Rowntree foundation found that the age group for adults with the highest poverty rates was 60–64.<sup>13</sup>

The potential impact on people who travel with concessionary fare holders also needs to be taken into account – those people who travelled with older persons for social and family activities may choose to stop doing so if the 60-64 age group concession is removed. This will increase the risk of social exclusion, reduce Translink’s passenger revenue and reduce the number of people using public transport.

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<sup>12</sup> <https://committees.parliament.uk/writtenevidence/120458/pdf/>

<sup>13</sup> [UK Poverty 2023 - Joseph Rowntree Foundation](#)



Statistics show that healthy life expectancy at birth between 2018-20 was 61.5 years for men and 62.7 years for women.<sup>14</sup> This suggests that many in this age group are unable to be fully economically active but may not necessarily meet the criteria for the Scheme based on disability.

Research also indicates that older people with ill health or disability who are likely to find it more difficult to continue working up to state pension age are likely to have lower private pension savings. This may in turn reduce their ability to cope with state pension age changes and the loss of related entitlements.<sup>15</sup> They will therefore have less disposable income to spend on travel, leaving them at risk of becoming socially excluded.

The impact on women in this age group is of particular concern:

- Consumer Council research has shown that older women are more likely to use public transport than older men and were less likely to have access to a car.<sup>16</sup>
- Women are more likely to have caring responsibilities and need transport to fulfil this and women aged over 60 are also less likely to be able to drive – 87% of men aged between 60-69 hold a driving licence compared to 77% of women.<sup>17</sup>
- The gender pay gap between men and women over 60 is 13.9%,<sup>18</sup> so women have less money to spend on transport.

The Department's own research demonstrates that the Scheme is predominantly used for shopping and social visits (67%), hospital appointments (58%), day trips (53%), entertainment (31%) and GP services (26%).<sup>19</sup> This shows that it has an extremely important role to play in combatting loneliness and isolation as well as accessing healthcare. Research conducted by the University of Glasgow<sup>20</sup> indicates that access to free travel increases bus use and access to services among older people, potentially improving mobility, social participation and health.

Spending on shopping, socialising and entertainment by the 60-64 age group also contributes to the service and retail sectors of the Northern Ireland economy. This economic driver will be lost if the 60-64 age group travels less.

We believe that removing free travel from the 60-64 age group, or up to state pension age, would have a negative impact on the mental and physical health amongst those who do not have access to, or cannot afford, another means of travel. It allows them to travel without relying on other people and enables them to access cheaper goods at supermarkets rather than relying on local convenience stores. The impact may also be felt more widely, as it could impact on childcare arrangements as many parents rely on older relatives to provide this.

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<sup>14</sup> <https://www.nisra.gov.uk/statistics/uk-national-wellbeing-measures-northern-ireland-data/health>

<sup>15</sup> [Soothing the Transition - Independent Review of the State Pension Age](#)

<sup>16</sup> [Older Persons Transport and COVID - Consumer Council research](#)

<sup>17</sup> [Travel Survey for Northern Ireland \(TSNI\) in-depth report 2020 | Department for Infrastructure \(infrastructure-ni.gov.uk\) Table 2.3](#)

<sup>18</sup> <https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/earningsandworkinghours/bulletins/genderpaygapintheuk/2022>

<sup>19</sup> <https://www.infrastructure-ni.gov.uk/publications/northern-ireland-concessionary-fares-survey-2019>

<sup>20</sup> [S0144686X19000692jra 2480..2494 \(cambridge.org\)](#)

Anecdotal evidence from the focus groups facilitated by the Department also suggests that the removal of concessionary fares from the 60-64 age group may mean that people would drive for longer than they otherwise might. Access to free travel at 60 provides the opportunity to make a lifestyle change to public transport at an earlier age.

### 3.5 Off-peak proposals

The Consumer Council would not support any proposal which makes public transport a less attractive option for people on the Scheme. Limiting usage to off-peak hours is a regressive step which would have a negative impact on a range of groups that are currently entitled to the Scheme.

Many disabled people will have no alternative means to access work opportunities. At one of the focus groups facilitated by the Department to discuss its proposals for the Scheme a participant said that:

*“It brings back societal assumption that disabled people can’t work. The savings may be small, but the negative impact would be huge.”*

Older people who care for young children to enable other family members to go to work will no longer be able to do this at the required time. It will disproportionately affect rural consumers as they may need to leave earlier in the day to reach the same destination as others who live nearer to essential services, such as medical centres and government offices, which are located in urban areas.

Any potential changes here would therefore impact on the Consumer Principles of Access, Choice, Fairness and Safety.

### 3.6 Bus-only proposals

We oppose the proposal to limit the use of the Scheme to buses only. This will have a negative effect on those groups of people who rely on trains. In particular, certain disabled persons rely on trains for the better access they provide for those in larger size wheelchairs, partially sighted people and people with guide dogs. The lack of toilet facilities on buses can also be a large factor for people with disabilities choosing to travel by train.

Limiting the Scheme to buses only would therefore negatively impact on disabled persons and the Consumer Principles of Access, Choice and Fairness.

### 3.7 Introducing a fee for a Smart Pass

We note that in other UK jurisdictions no fee is charged for application, renewal or replacement. Careful consideration should be given as to the potential impact on vulnerable consumers of the introduction of any fee, no matter how small. The administrative cost of putting this in place should also be considered. We believe that people with life-long or long term conditions should not be required to pay renewal fees if their condition can be certified as not changing.

This proposal may have implications on the Consumer Principles of Access, Choice and Fairness.

## PART B PROPOSALS

We support the extension of the Scheme as set out in Part B of the consultation document. The changes proposed align with and support what we believe the Scheme objectives should be.

### 3.8 Extending the half-fare concession to free transport for people with a qualifying disability

The Consumer Council believes that the Scheme should be extended to provide free travel for people with disabilities who currently receive a half fare discount. This change would bring Northern Ireland in line with Great Britain and the Republic of Ireland and end the anomaly where free travel is already available on the Glider.

A report published by Scope in 2018<sup>21</sup> stated that 49% of disabled people it polled said that they feel excluded from society. Just 23% said they feel valued by society. The report noted that being able to travel on public transport how and when you want is a key aspect of life which can be both an enabler and a barrier to disabled people living the lives they choose. This includes being able to get into and stay in work and having the right care and social connections.

A report by the Resolution Foundation<sup>22</sup> found that the underlying disposable income gap in the UK between the disabled and non-disabled population was 44% in 2020-21. Northern Ireland has the lowest disabled employment rate (39%) of any UK region, and the widest employment rate gap between disabled and non-disabled persons.<sup>23</sup>

It is important to ensure there are sufficient incentives to make public transport an attractive option to people with disabilities. For example, there are 23 average journeys taken each year on Metro/Ulsterbus by people with a mobility difficulty compared to 31 journeys for those with no mobility difficulty.<sup>24</sup> This indicates that a further discount could be used to motivate those with disabilities to use public transport more.

### 3.9 Widening the criteria for a Smart Pass on the grounds of disability in line with other UK regions

We believe the criteria to qualify for the Scheme on the grounds of disability should be widened. The current Scheme has limited criteria compared to Great Britain where concessionary travel extends to people who are profoundly or severely deaf, without speech, do not have arms or have long-term loss of the use of both arms, or have a learning disability.<sup>25</sup> There are also additional categories of people with disabilities who are eligible for concessionary travel in Scotland including those with mental health problems and the terminally ill.<sup>26</sup>

There are also anomalies in the current Scheme regarding disabled persons. One example is that people with full sight loss are entitled to free travel, but partially sighted people are

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<sup>21</sup> <https://www.scope.org.uk/campaigns/independent-confident-connected/>

<sup>22</sup> [Costly differences • Resolution Foundation](#) January 2023

<sup>23</sup> [Disabled People in Employment - House of Commons Library](#)

<sup>24</sup> [Northern Ireland Transport Statistics 2019-2020 \(infrastructure-ni.gov.uk\)](#)

<sup>25</sup> [Guidance for travel concession authorities on the England national concessionary travel scheme - GOV.UK \(www.gov.uk\)](#)

<sup>26</sup> [Apply for or renew a disabled persons bus pass - mygov.scot](#)

only entitled to the half fare Smart Pass, even though both categories may face the same barriers to travel such as being unable to drive.

Another current qualifying criterion is “people who *have been* refused a driving licence on medical grounds” but not people who *would be* refused a driving licence on medical grounds. These examples illustrate that the current criteria have a detrimental impact on the Consumer Principle of Fairness.

### 3.10 Entitlement for disabled people who have difficulties using public transport to have someone travel with them on their Smart Pass

We welcome the proposals for a companion pass. This will remove a barrier to travel for people who find travelling alone difficult and will bring Northern Ireland into line with other UK regions and the Republic of Ireland. It is important that this would not be limited to any one named individual so that people have every opportunity to use it when they need to.

We also note the recent report from members of the Coalition of Carers Organisations Northern Ireland<sup>27</sup> which highlighted the expense of extra transport costs for carers in taking the person they care for to health appointments and recommended discounted public transport for unpaid carers, including child and young adult carers. Extending the Scheme to a disabled person’s companion will address this concern.

This proposal will have a positive impact on the Consumer Principles of Access, Choice, Fairness and Safety.

### 3.11 Extending the Scheme to include free transport for asylum seekers receiving asylum support and victims of human trafficking

The Consumer Council supports proposals to extend the Scheme to asylum seekers and victims of human trafficking. It was estimated that in May 2022 there were approximately 1,200 asylum seekers housed in hotels in Northern Ireland, including 200 children.<sup>28</sup>

People seeking asylum are entitled to just £45 per week, or if housed in accommodation with meals provided £9.10 per week. This level of income makes it almost impossible for asylum seekers to access essential services that are not within walking distance. Many asylum seekers are now accommodated outside of Belfast which compounds the problem.

It also makes it very difficult to mix with family or friends who may live elsewhere. Providing free travel for this vulnerable group would show that Northern Ireland is a welcoming place for asylum seekers and supports the Consumer Principles of Access and Fairness.

### 3.12 Replacing the current residency test for a Smart Pass with a different test to make it more accessible to all Northern Ireland residents

The Consumer Council supports proposals to replace the current residency requirement (three months permanent residence) with a different test. Consumers who would otherwise meet the criteria for the Scheme should be able to apply for it immediately rather than having to wait for a period of three months. This would also bring Northern Ireland in line with other jurisdictions.

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<sup>27</sup> <https://www.carersuk.org/media/rojegayo/a-new-deal-for-unpaid-carers-in-northern-ireland.pdf>

<sup>28</sup> [Asylum: 200 children living in Northern Ireland hotels - BBC News](#)

### 3.13 Widening the list of proof of residency to make the Scheme more accessible to those older and disabled people who are already entitled to apply

We welcome the proposal to widen the list of documentation required to prove residency. It is likely that more vulnerable consumers will not have access to the current documentation required i.e., a driving licence, utility bill, bank or building society statement or electoral ID card. This may be because they have not lived in Northern Ireland long enough to obtain this (for example refugees or asylum seekers), or often documents such as utility bills are in the name of another household member.

This proposal will have positive implications for the Consumer Principles of Choice, Access and Fairness.

## **ADDITIONAL COMMENTS**

### 3.14 Young People

We note the reasons why there are no proposals regarding concessionary fares for young people within this consultation. However, we believe there are benefits to extending the Scheme to young people beyond the current Y-Link card half fare discount.<sup>29</sup>

Currently in Scotland, all people under 22 years are entitled to free public transport. In just over a year since the programme commenced, over 50 million free bus journeys had been made.<sup>30</sup> We recommend the Department reviews the findings from Year 1 of the programme in Scotland once it is published and look at ways to encourage more young people to use public transport.

The benefits of providing free travel for young people are twofold:

- Increasing the access to educational and employment opportunities to young people.
- Achieving a modal shift towards public transport by normalising use of public transport from a young age. Decarbonisation of our transport system requires major behavioural and attitudinal change and this should start as early as possible.

In 2022 there were 273,727 young people aged between 6-16 living in Northern Ireland and 131,419 aged between 17-22.<sup>31</sup> Each of these could realise the benefit to themselves, the local economy and the environment if provided with a full fare public transport concession.

This potentially impacts the Consumer Principles of Access, Choice and Fairness.

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<sup>29</sup> [Concessionary Fares January 2023 Policy Paper.pdf \(consumercouncil.org.uk\)](#)

<sup>30</sup> <https://www.transport.gov.scot/news/over-50-million-free-journeys-made-by-under-22s/>

<sup>31</sup> <https://www.nisra.gov.uk/publications/census-2021-main-statistics-demography-tables-age-and-sex> (Table MS-A05)

### 3.15 Administrative issues with Concessionary Fares Scheme

Whilst not directly part of this consultation, there are administrative issues with the Scheme which we recommend should be addressed at the same time as the proposals. We previously raised these in our policy paper on concessionary fares.<sup>32</sup> They are:

- The current half fare Scheme only applies to a 50% discount of full single fares. In many cases it may be cheaper to buy a return fare or avail of a special offer.
- An online option to apply for concessionary fares should be provided.

### 3.16 Concessionary Fares on other services

We note that passengers can avail of concessionary travel on community transport services, as well as the Strangford and Rathlin Island Ferry services. Whilst concessions offered on these services are not part of the Concessionary Fares Scheme, it is likely that any changes to the Scheme would be mirrored. Our overall comments on the consultation proposals therefore also apply to these services.

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<sup>32</sup> [Concessionary Fares January 2023 Policy Paper.pdf \(consumercouncil.org.uk\)](#)

#### **4. CONCLUSION**

The Consumer Council does not support any changes to the Scheme which have the potential to reduce the number of journeys taken by public transport. The Scheme should be refreshed and refocused on increasing the use of public transport with the twin objectives of reducing Northern Ireland's transport carbon emissions and promoting social inclusion.

We strongly support the proposal to extend the half-fare concession for disabled people to a full fare concession with a widened criteria, and for the full fare concession to include a person accompanying a disabled person, asylum seekers and victims of human trafficking.

We would welcome further ongoing engagement with the Department on all aspects of our response.

## 5. CONTACT DETAILS

If you require more information please contact Richard Williams, Head of Policy (Transport) on 028 9025 1649 or at [Richard.williams@consumercouncil.org.uk](mailto:Richard.williams@consumercouncil.org.uk).



## PART A

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

Yes  No

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+ Smart Pass 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 and new applicants

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

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 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

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

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

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

Yes  No

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
- 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

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

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

Yes  No

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

Yes  No

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

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

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

Yes  No

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

## **PART B**

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

Yes  No

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

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

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.

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

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.

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

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.

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

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

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

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



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