

Travel pass...essential lifeline

Consultation response to Department of Infrastructure

Free and discounted fares on public transport (concessionary fares)

August 2023

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1.0 About Age NI

Age NI is the leading older people's charity in Northern Ireland. The vision of the charity is for: *'a world where we can thrive as we age'* and the mission is *'to help people enjoy later life'*.

Age NI believes that people should be supported to enjoy later life; to know and understand their rights; to remain as independent as possible; and to stay connected to their communities. Age NI provides advice, care, and wellbeing support to thousands of older people, their families, and carers across Northern Ireland.

In terms of service reach, between April 2022 and March 2023 Age NI had over 91,000 **direct engagements** with over 6,000 **older people** across our services. Age NI's Advice and Advocacy service handled 12,552 **calls** and identified over **£1m** in additional benefits for older people. Age NI supports and strengthens the capacity of age sector networks which support older people and groups in local communities across Northern Ireland.

2.0 This consultation

Age NI welcomes the opportunity to respond to the Department for Infrastructure's (DfI) consultation on free and discounted fares on public transport (concessionary fares).

Age NI believes that the DfI policy on concessionary fares should be retained in its current form without any reduction in the current eligibility criteria.

Age NI supports Option 1A set out by the DfI in its consultation paper – to make **no change** to the Scheme, leaving the age eligibility rules as they are now.

Age NI rejects the proposals in Options 2, 3 and 4 to limit the use of the SmartPass and to introduce fees for the application, renewal and replacement of the card.

We look forward to more defined plans and proposals to extend the scheme to meet its aim of reducing social exclusion and will be happy to engage with the Department at the appropriate time when more details are confirmed.

3.0 Northern Ireland's Ageing Population

Northern Ireland has an ageing population – a fact that is both a cause for celebration and a challenge. Age NI urges the Department to take this fact and its opportunity into account when making decisions about access to the Concessionary Fares Scheme (CFS).

We have known for some time that we are living in an ageing society and the population of Northern Ireland is ageing at a faster rate than the rest of the UK. The recent census¹ re-

¹ <https://www.nisra.gov.uk/system/files/statistics/census-2021-main-statistics-for-northern-ireland-phase-1-press-release.pdf>

vealed that there has been a 24% increase in the population aged 65+ since 2011. It is estimated that by 2028 there will be more people aged 65+ than children under 15². 56.8% of 65+ population have activities limited by long term health problem or disability.

The Department's proposals require planning and preparedness for Northern Ireland's ageing population. Age NI believes that action and change are needed across all Government departments if we are to respond positively to our ageing population, help people stay well and independent for longer, and deliver positive outcomes for older people, their families and communities now and in the future. Cross-departmental planning with a focus on prevention and early intervention is required, rather than current approach of crisis intervention and damage limitation.

4.0 COVID-19 and Cost-of-Living Crisis

Age NI also urges the Department to take account of the current context when making decisions on budget cuts. Of particular note is the profound impact of COVID-19 and the cost-of-living crisis on older people. To fully redress the impact of COVID-19 requires action responsive to the needs of older people. This should be an assets-based approach which works in collaboration with age sector organisations (including age sector networks and Age Friendly leads) and in co-design with older people.

COVID-19 exposed and amplified a number of inequalities in society and communities, with deaths due to the virus higher in areas of deprivation and death rates of people over 75 years of age nine times that for all ages.

Prior to the pandemic, many older people were living fulfilling lives, actively contributing to the economy and society, supporting their families, neighbours and communities through volunteering, caring for others, providing childcare and working beyond the traditional retirement age. With COVID-19, and the consequent restrictions on volunteering and civic duties, some older people have lost their sense of purpose, along with important community and social connections.

Age NI believes that the policy proposals should be responsive to wider factors. These include the extent of health inequalities and higher levels of disability in Northern Ireland, the persistent nature of pensioner poverty, and the high levels of fuel poverty experienced by older households. In addition are the impacts of Northern Ireland's conflict, poor transport links, limited digital access by older people and the fact that approximately 36% of people in Northern Ireland live in rural areas. More than one in ten people aged over 65 in the community live with frailty, which also affects over half of adults in hospital or care home settings. Frailty is increasing as people are living longer with multiple long-term conditions.

Much of this contributes to an increase in isolation and loneliness, de-conditioning and cognitive decline among older people.

² <https://www.nisra.gov.uk/news/2018-based-population-projections-northern-ireland#:~:text=by%20mid%2D2028%2C%20there%20is,mid%2D2043%20across%20the%20UK.>

In *Wellbeing in Northern Ireland, 2021-22* NISRA reported an increase in the percentage of the Northern Ireland population feeling lonely; and higher levels of loneliness for older people aged 65+; those with bad or very bad health; people living with a disability; and people caring for someone with a disability or someone in later life.³

The proportion of pensioners in relative poverty has risen to 16% in 2021 - 22, compared to 13% in 2019 - 20⁴. That is 47,000 people. Older people living on fixed low incomes, such as their State Pension and benefits, are already struggling to cover essential energy and living costs and are not in a position to make further cuts to meet unexpected expenses. People living with a disability or ill-health, or who provide care for loved ones, are likely to have higher energy and other costs and will, therefore, experience even greater financial pressures.⁵

Research indicates that groups most at risk of being in poverty in retirement are single women, people living alone, people who are amongst the oldest age group (85+), people who are from BAME communities, people who rent private or social housing, people with a disability, people with caring responsibilities and those who are self-employed. Older people live on a fixed income, with no scope to source an additional or new income.⁶

Free, accessible transport has been and continues to be a lifeline for many older people. The SmartPass is prized and valued by them for many reasons. It has enabled them to return to activities and contribute to their local community. Older people use it to access the services they need to stay well and remain as independent as possible. An effective, affordable public transport system is key to creating and promoting Age Friendly communities and societies for people and families of all ages.

³ <https://www.executiveoffice-ni.gov.uk/publications/wellbeing-northern-ireland-report-202122>

⁴ [https://www.northernireland.gov.uk/news/northern-ireland-poverty-and-income-inequality-report-2021-22-released#:~:text=Pensioners%20%E2%80%93%20Poverty%20\(After%20Housing%20Costs,from%2010%25%20to%2012%25](https://www.northernireland.gov.uk/news/northern-ireland-poverty-and-income-inequality-report-2021-22-released#:~:text=Pensioners%20%E2%80%93%20Poverty%20(After%20Housing%20Costs,from%2010%25%20to%2012%25)

⁵ https://www.nicva.org/sites/default/files/d7content/attachments-articles/recommendations_for_an_ni_anti-poverty_strategy_-_a_paper_from_members_of_the_aps_co_design_group_september_2022.pdf

⁶ <https://www.lboro.ac.uk/media/wwwlboroacuk/content/crsp/downloads/reports/Living%20on%20a%20low%20income%20in%20later%20life.pdf>

5.0 Northern Ireland's Economic and Political Situation

Age NI acknowledges the challenging budget decisions facing the Department at this time.

The absence of locally elected Ministers and the suspension of the political institutions coupled with budget constraints place organisations and individuals at great risk of serious and long term adverse impacts.

The Equality Commission for Northern Ireland have been clear that, in the current context (i.e. pressures on public sector finances), adherence to and compliance with Section 75 duties "is even more essential".⁷ Age NI believes that it is inappropriate in these circumstances to remove access to the CFS from any group of people.

6.0 Engagement with Older People

Age NI has actively and regularly focused and engaged on the issue of transport and travel and their importance to older people, their welfare and wellbeing.

We value and promote the expertise and insight of older people. Our response to the current consultation is based on the views and experiences of older people and draws on their lived experience of the benefits of the SmartPass.

Most recently the views of older people on the significance and value to them of concessionary fares have featured in Age NI's Lived Experience series of reports (2020 – 2023). In the 2021 Lived Experience survey, older people ranked what matters most to them in terms of support⁸ and transport emerged as the second most important priority. Subsequently, the SmartPass featured in a question to Minister Mallon at Pensioners' Parliament (September 2021), and in our 2022 Northern Ireland Assembly election manifesto.

For this consultation, we held several meetings with older people including members of Age NI's Consultative Forum and members of local age sector networks. The DfI team leading the consultation engaged directly with members of the Consultative Forum.

We promoted the consultation on our social media platforms and invited comments on the value of the SmartPass.



⁷ <https://www.equalityni.org/ECNI/media/ECNI/Consultation%20Responses/2023/DfC-SpendingPlans2023EQIA-ECNIresponse.pdf>

⁸ <https://www.ageni.org/news/lived-experience-forum-2021>

7.0 Lived Experience 2023: Support – Transport and Travel

Age NI ran its Lived Experience 2023 survey over the summer of 2023. This is the third in a series of Lived Experience reports which started in 2020 about the impact of COVID-19 on older people.

Almost 1,000 responses were received to the survey. Of the total responses, 956* were to a question asking about the importance of transport and travel to them (*Q1.d Transport and travel e.g. ensuring safe, appropriate travel options and retaining travel passes for over 60s*).

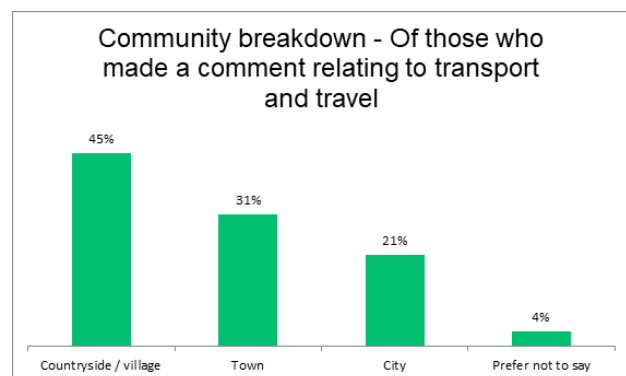
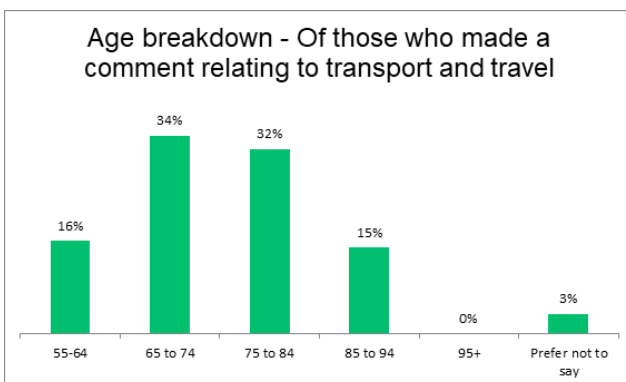
*Valid as of 16 August 2023

Just under three quarters (74%) of those who answered this question felt support with transport and travel is **Absolutely Essential**. A further 20% felt that support with transport and travel is **Very Important**. This means that 94% of respondents view support with transport and travel as very important or essential.

In addition to being invited to rate the importance of issues, respondents had the opportunity to comment on each theme. In total, 389 people offered comments and, of these, 23% made a comment relating to transport and travel.

The topics and phrases that feature most frequently are **travel pass** (n=50) or **SmartPass** (n=5), **rural transport / support** (n=13) and **free transport / more availability of transport** (n=85) for older people.

Below is an age and community type breakdown of those who added a comment relating to transport and travel:



A selection of comments made by respondents to Q1.

Travel pass

"I heavily rely on my bus pass to visit my sister who is my only surviving relative and is housebound without it the cost would restrict my ability to visit on a regular basis."

"As a blind person I am absolutely determined that the abolition of travel passes should be fought. I value my pass as a means of living my life on my terms. The alternative is taxis which given the cost of living crisis is not a valid option .Please do not remove my lifeline."

"At the minute I am pretty self-sufficient but would definitely not want to lose my bus pass. As I get older I want support to remain at home & not be a burden on my family."

"For those living alone with no family this is vital to get rid of isolation & keep health standards good. Bus pass is essential to combat loneliness & isolation"

"Travel Pass essential - a lifeline to the outside world aids mental, physical & social health."



"Free bus passes can be a lifeline for many older people giving them mobility, an opportunity to get out & see other people & to be more independent. Good for mental health."

SmartPass

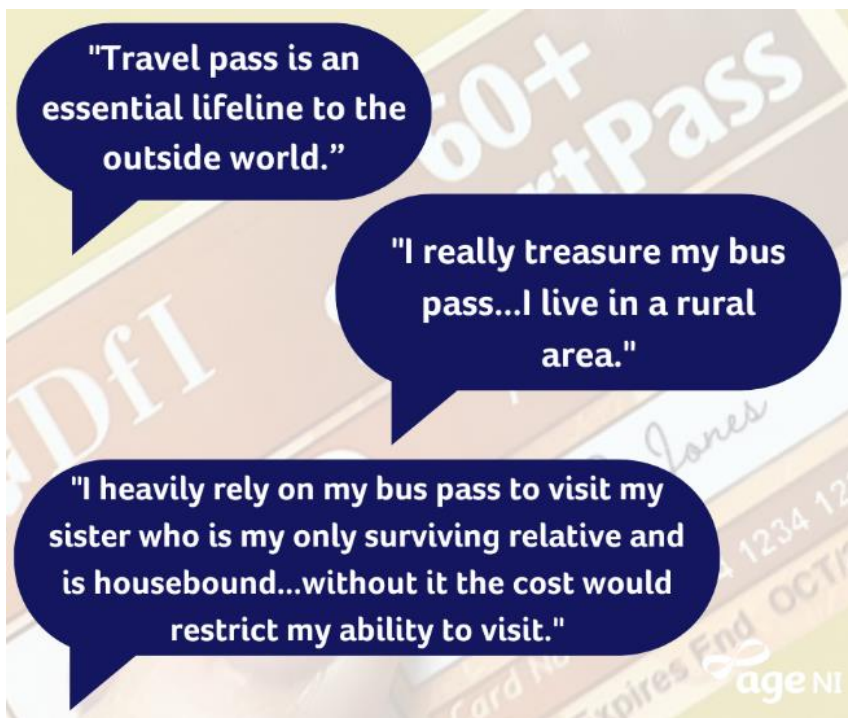
"Free Smart pass scheme should continue as it is for older adults who are terrified it is going to be withdrawn."

"Smart pass & local post office/bank staying open plus bus service is very important when you can no longer drive."

"I am concerned about the current proposals to the SmartPass. I think it is invaluable for so many older people."

"In my view the retention of the Smartpass as it stands now is vital to the wellbeing of the older community."

Rural transport



"I am 69 years old and live in a very rural area. I am totally dependent on my bus pass to travel to work every day. I cannot stop working as my pension was changed at little to no notice and must now work on ad infinitum!!"

"Fermanagh Community transport is very important for travel to medical appointments and also for shopping."

"Bus pass is vital for rural dwellers." "Rural transport needs to be more easily available."

"Without rural transport many people would be isolated at home and not see anyone for weeks."

"Bus passes and rural transport are essential."

"Living in a very rural area transport can be difficult unless you can drive or have someone that can drive you. Rural transport and bus passes must be retained."

"Rural transport is practically non-existent and more and more banks are shutting down."

"Rural areas are bereft of public transportation."

"More public transport availability for rural areas."

8.0 Proposals on the Concessionary Fares Scheme

Age NI is deeply concerned about the potential adverse impact that proposals to restrict access to CFS could have on older people and others. People impacted may be:

- those who face multiple barriers in using public transport
- are at risk of or are living in poverty
- rely heavily on services to support living independently and with dignity;
- are providing unpaid care to family members or friends
- are experiencing social exclusion, material deprivation and disadvantage; prejudice and discrimination, and
- unable to benefit from or participate fully in the life of their community

We note that the Department is currently engaged in a wider public consultation on its draft Budget for 2023 - 24, and we welcome the fact that a separate EQIA on the CFS is being undertaken. It appears, however, that the potential equality impacts of the proposed changes to the CFS have not been considered as part of the wider Departmental EQIA on budget cuts.

Age NI believes that the policy proposals on the CFS should be part of the overall Departmental budget consultation. Consideration should be given to assessing the potential equality impacts of this individual policy at the strategic level⁹ which would help to identify any cumulative impacts.

We note, for example, the potential cuts to community transport, which is also acknowledged as a lifeline for older people and others. The proposed cuts are identified in the Department's 2023 - 24 Budget EQIA as having an adverse impact on older people, disabled people and women.¹⁰ (Age NI was surprised that people with dependents were not also identified).

The impact of reduced access to the SmartPass on community transport users was raised as the SmartPass is needed to access community transport schemes. Accessible, reliable schemes are an essential tool in reducing health inequalities. Community transport ensures that those living with poor transport networks can access appointments and services which they would not otherwise be able to do. The cumulative impact of reduced access to transport will have a multiplier effect, causing indirect adverse impacts across a wide range of areas of older people's lives.

⁹ [Age NI response to DfI Budget consultation](#)

¹⁰ <https://www.infrastructure-ni.gov.uk/sites/default/files/consultations/infrastructure/eqia-consultation-document-budget-2023-24.pdf>

The Departmental Budget EQIA recognises that:

“Major potential impacts have been identified as a result of potential reductions to public transport and community transport. Older people, who normally make up approximately 20% of Metro passengers, 16% of NIR passengers and 13% of Ulsterbus passengers, and 57% of community transport users, require a service level to meet their normal daily needs which may include access to shops, friends and community facilities as well access to health and care services.”¹¹

No mitigations, however, are proposed or offered which is deeply concerning.

In addition, consideration should be given to the potential cumulative, adverse impacts on older people of budget decisions across Government departments. Transport is a prime example of a service which would benefit from a collective, cross-departmental approach. It is pivotal to supporting effective policies and services led by other departments - for example, the departments of Health, Communities, Education, Economy and DEARA all glean strategic benefits from transport provision.

The lack of a wider strategic approach to public transport in this consultation is a concern. Age NI submits that DfI has missed the opportunity to frame the debate about concessionary fares and is posing the wrong questions. Rather than considering whether any group deserves access to the CFS more than others, the Department should adopt a strategic focus to develop a comprehensive transport system to meet the needs of people across Northern Ireland which is responsive to our ageing population and the climate crisis.

Age NI notes that the Department is leading on Transport Planning 2020 to 2035¹² and has previously set out its vision for a transport system in Northern Ireland placing climate change and connecting people at its heart. We are concerned at the lack of reference in the current consultation to the development of an accessible transport strategy to ensure equal access by older people and others to transport.

¹¹ <https://www.infrastructure-ni.gov.uk/sites/default/files/consultations/infrastructure/eqia-consultation-document-budget-2023-24.pdf>

¹² <https://www.infrastructure-ni.gov.uk/articles/transport-planning-2020-2035>

9.0 Option 1 - Raising Age Eligibility

Question 1	
Do you think changes should be made to the age eligibility for the Scheme?	No
Question 2	
If the Department was to introduce changes to the age eligibility, which is your preferred option?	N/A
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?	N/A
Question 4	
If you wish to provide comments supporting your answers, please do so below.	See below

Age NI strongly believes that no changes should be made in respect of proposals outlined in Part A of the consultation document. The CFS provides invaluable support to older people of all ages. It supports their physical and mental health, as well as promoting their independence, enabling them to stay in employment or access opportunities for learning and training, and supports their caring responsibilities.

Research reveals how poor access to transport impacts on people's lives and life opportunities. This includes limiting access to employment, education and learning, reducing access to key services including healthcare, social, cultural and leisure activities, as well as to cheaper food and choice provided by larger supermarkets.¹³

¹³ https://www.ilo.org/wcmsp5/groups/public/---ed_emp/---emp_policy/---invest/documents/publication/wcms_asist_8210.pdf

10.0 EQIA

The Department's own EQIA identifies the potential for adverse impact of this policy proposal (in Option 1A or Option 1B) on older people and those with dependents, and also identifies differential impacts on those with multiple identities (e.g. older people (60- 64) with a disability who do not qualify for a disabled person's pass).¹⁴

The EQIA finds that raising the eligibility age could result in these age groups...

“choosing not to travel or travel less because they will be required to pay a fare. If people reduce travel because they cannot afford to pay for public transport, it could impact on their ability to:

- *travel for work, volunteering or caring*
- *access services and amenities*
- *travel to health or other appointments*
- *meet friends and family*

This could, in turn, increase their social isolation. It could also impact on the amount of money they have to spend on other things.”¹⁵

The consultation indicates that the CFS is taken up by those in lower income households (para 1.9) and reduces the risk of social exclusions (para. 1.10). The Department sets out direct and indirect benefits of the CFS and acknowledges that it contributes *“to wider social, economic, environmental and public health goals.”* Direct and indirect benefits identified by the Department in both the consultation and EQIA include:

- staying active, meeting friends, accessing goods and services
- travelling to and from work; and economic benefits
- reduced road congestion due to increased use of public transport
- increased expenditure in local economy through more frequent shopping/leisure trips
- benefits to the wider community as older and disabled people are enabled 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 can support individuals through reducing social isolation, increasing independence, and promoting good health outcomes.¹⁶

¹⁴ <https://www.infrastructure-ni.gov.uk/sites/default/files/consultations/infrastructure/nicfc-draft-egia.PDF> p. 5, para 1.7

¹⁵ <https://www.infrastructure-ni.gov.uk/sites/default/files/consultations/infrastructure/nicfc-draft-egia.PDF> p. 5, para 1.7

¹⁶ <https://www.infrastructure-ni.gov.uk/sites/default/files/consultations/infrastructure/nicfc-2023-ni-concessionary-fares-schemer.PDF>, p. 8

The EQIA references research on use of the concessionary travel schemes in Northern Ireland, published in 2021, which highlighted a range of benefits for users, including greater access to services and opportunities, such as, shopping, education, work, and day trips, as well as visiting family and friends. It concludes that proposals which reduce the concession available have the potential to have an adverse impact on people’s economic, social, and cultural life as well as to exacerbate health inequalities for S75 users and impact on wider economic growth.

In addition, given that 67% of existing SmartPass holders report using their pass to visit family and friends¹⁷ the EQIA identifies a residual impact of the proposals on good relations¹⁸ and the integration of new communities to Northern Ireland.

Research supports the Department’s statements about the benefits of concessionary fares in both the consultation document and its EQIA. Studies show that concessionary fares contribute to a greater level of physical activity,¹⁹ improved protection against dementia,²⁰ a better quality of life, greater life satisfaction and greater levels of happiness amongst older people²¹. They also bring “substantial economic, social and environment benefits” across society, including in economic productivity, social inclusion, environmental sustainability and public health.^{22 23}

While those in the 60 - 64 age group are more likely to be employed than the 65 and over age group, raising the age eligibility for concessionary fares could have a negative impact on some people within this group. In particular, those on low incomes, who do not have access to a car or other means of transport, or who are socially isolated. Raising the age of eligibility for the SmartPass could have unintended negative consequences on other Section 75 groups. For example, taking the SmartPass from carers within this age group, or from people with a disability or with mobility issues (who are not entitled to a disabled person’s SmartPass) could make it more difficult for these people to use public transport.

¹⁷ Ibid - <https://www.infrastructure-ni.gov.uk/sites/default/files/publications/infrastructure/concessionary-fares-survey-report.pdf>

¹⁸ Intergroup contact is reliably associated with reduced prejudice, even in the face of group threat and discrimination. (apa.org), cited in <https://www.infrastructure-ni.gov.uk/sites/default/files/consultations/infrastructure/nicfc-draft-eqia.PDF>

¹⁹ Coronini-Cronberg, S., Millett, C., Laverty, A. & Webb, E. (2012). The Impact of a Free Older Persons’ Bus Pass on Active Travel and Regular Walking in England; *American Journal of Public Health* (102:11) pp.2141- 2148

²⁰ Kings College London. (2019). Free bus rides essential for healthy brain function; Available at: <http://bit.ly/2ZaAqIB>

²¹ University College London. (2019). Bus passes linked to increased happiness for older adults; Available at: <http://bit.ly/31Tg1MK>

²² Greener Journeys. (2014). The costs and benefits of concessionary bus travel for older and disabled people in Britain; Available at: <http://bit.ly/2Mryoo6>

²³ Transport Scotland. (2014). Concessionary Travel - Customer Feedback Research Year Two Report; Available at: <http://bit.ly/2IIW0IN>

We note that the EQIA states that 60 - 64 year olds may be less likely to face social exclusion because they are more likely to be active and mobile than those in the 65+ category. The evidence to support this claim, however, does not provide a useful comparator, as it uses very wide age bands, comparing 40 - 64 to 65+. Even on these figures 28% (173,000) people aged 40 - 64 have a long-term limiting health condition or disability.²⁴

Department of Health figures from the *Health Survey (NI): First Results 2021/22* show that 53% of people aged between 55-64 currently living with a longstanding illness.²⁵ Whilst some of these will be eligible for concessionary fares because of their disability, many will not be eligible or not realise they have a right to a SmartPass. Data specific to this age group are required in order to understand adverse impacts of this policy for people who are living with long-term health conditions or disabilities.

The EQIA assumes that because people are “*more likely to be active and mobile*” that this will provide some mitigation to the risk of social exclusion that withdrawing the SmartPass from 60 - 66 year olds is likely to bring but without providing any evidence to justify this.

The EQIA identifies that increasing the eligibility age through Option 1B or 1C may have a greater negative equality impact on women in this age group, in comparison to men, because they may have less to spend on public transport. The EQIA states:

*“women face economic disadvantage throughout their lives, in comparison to men. They have on average, poorer career progression, higher rates of casual, part-time, and low status work, and receive lower pay. Research has highlighted that the disadvantage is mainly caused by traditional family/care roles, exacerbated by poor availability of affordable childcare (especially in NI). All of this reduces women’s ability to contribute to pension schemes and National Insurance contributions.”*²⁶

According to the *Travel Survey for Northern Ireland In-depth Report 2017-2019*, women aged 60+ made twice as many of their journeys by public transport.²⁷

Research shows that men and women use public transport differently. According to a report by the United Nations, women “chain” their activities by combining multiple stops and destinations within a single, longer trip as a result of their household and caretaking responsibilities.²⁸

We note that gender data is not collected in relation to the SmartPass usage and recommend that the Department start collecting and publishing this information.

²⁴ The prevalence of long-term conditions varies with age.- for further information see Census 2021: [Census 2021 Main statistics for Northern Ireland - Statistical bulletin - Health \(nisra.gov.uk\)](#)

²⁵ <https://www.health-ni.gov.uk/sites/default/files/publications/health/hsni-first-results-21-22.pdf>

²⁶ <http://www.niassembly.gov.uk/globalassets/documents/raise/publications/2017-2022/2017/general/3317.pdf> cited in EQIA: <https://www.infrastructure-ni.gov.uk/sites/default/files/consultations/infrastructure/nicfc-draft-eqia.PDF>

²⁷ <https://www.infrastructure-ni.gov.uk/system/files/publications/infrastructure/tsni-in-depth-report-2017-2019.pdf>

²⁸ <https://www.stopstreetharassment.org/wp-content/uploads/2011/04/5-13-add-building-safe-inclusive-cities-for-women.pdf>, cited in EQIA, <https://www.infrastructure-ni.gov.uk/sites/default/files/consultations/infrastructure/nicfc-draft-eqia.PDF>

11.0 Adverse Impacts

Age NI believes that continued and ongoing access to the CFS in its current form is essential for the welfare and wellbeing of older people. The CFS enables people to stay connected with each other and with their wider environment, as well as increasing activity levels and delaying the onset of mobility problems.

The potential adverse impacts of changes to the CFS are reflected in the comments of older people who engaged directly with the Departments's consultation team and Age NI.

“As an older person, I sometimes think of taking the car somewhere but opt instead to use public transport because it is free. This means I walk a lot more than I otherwise would. This naturally contributes to my overall physical health. Walking contributes to my core strength and helps to guard against frailty and osteoporosis, thus saving money from the health budget in the longer term”. Older woman

“I have been a widow for 32 years and live very independently. My concessionary pass enables me to be involved in a range of activities that I might otherwise not be able to afford to access. My mental health and wellbeing is currently very good but I doubt that would be sustained if my activities were curtailed. Poor mental health also impacts on physical health. Also, as my eyesight is deteriorating, when I reach the point where I can no longer drive, my sense of isolation will intensify just as I am having to cope with increased difficulty in everyday life. I fear for my independence and the impact of that on my mental wellbeing”. Older woman

It was noted that the CFS currently enables many older people to access healthcare appointments and hospital treatments and can make it easier for people to be accompanied by friends or family to difficult appointments, and to visit family and friends in hospital.

“I travelled with my friend from [rural town] to Belfast for radiotherapy five days a week for six weeks. I went with her every day. Neither of us could have made the journey without the bus pass.” Older woman

Without their SmartPass, some people may feel more tempted to drive, even when it feels safer to use public transport due to health conditions.

“Although my macular degeneration has not reached a stage where I am advised not to drive, in certain conditions I avoid driving because I feel it is unsafe. This usually involves poor light. Were I not able to get free public transport there is more likelihood that I might risk driving when I perhaps should not.” Older woman

Older people also raised concerns about the fact that as the health transformation agenda takes effect, certain health services will be further away for many people. This will increase the number of older people needing to access health and care services at a distance from where they live, and so will increase the need for the SmartPass.

As one older person said, “*this is exactly the wrong time*” to reduce entitlement as it could have concerning, unintended consequences and impact on people’s ability to access the health and social care supports that they need.

Transport is an enabler to access a wide range of services and is recognised as a key factor in tackling health inequalities. Reducing access to services in this way will impact further on health inequalities that the Department of Health, the Public Health Agency and partners are working to reduce through implementation of *Making Life Better - A whole system framework for public health, 2013-2023*.²⁹

Older people identified transport as an issue which cuts across many Government departments. It enables uptake of services and delivery of cross-cutting policies and strategies led by, for example, Departments of Health, Communities, Education, Economy, DEARA) This reiterates the need for Departments to work in concert and not in silos, in order to ensure that policies align and are mutually supportive, rather than one policy potentially damaging access to the services managed by others.

The EQIA noted that the CFS provides an important gateway to health services. 58% of journeys made using a SmartPass were for hospital appointments while 26% were to visit a GP.³⁰

Older people and age sector workers that Age NI spoke to are very concerned that reducing access to the CFS would be contrary to prevention and early intervention policies and approaches across a range of departments, which aim to increase physical and mental health and wellbeing. This can be as simple as older people using public transport more often because of the SmartPass and walking more to train stations or bus stops. If people’s use of public transport reduces as a result of these proposals, then their general activity levels could decline, with potential longer-term negative impacts on health.

Older people raised concerns about the possible impact that reducing eligibility could have on all-Ireland travel. One contributor to our engagement asked:

“Are we really going to have a situation where we pay fares to Newry and travel free across the border?” Older man

Another participant commented that while it is possible to get a return ticket for travel from Northern Ireland to the Republic of Ireland, it is not possible to book a return from within Northern Ireland.

Others raised the potential implications for public transport more generally if the age eligibility is increased and public transport is used less.

The Department acknowledges that there is a lack of information available about behaviours should any of the proposed restrictions to current levels of service provision be imposed. A study in Wales estimated that half of the 300,000 older people affected would choose to pay for the bus fare. This would put a financial strain on the incomes of many

²⁹ <https://www.health-ni.gov.uk/topics/health-policy/making-life-better>

³⁰ <https://www.infrastructure-ni.gov.uk/sites/default/files/consultations/infrastructure/nicfc-draft-eqia.PDF>

older people at a time when relative poverty rates are rising in the country. It would also erode any benefit of Carers' Allowance as an older person caring for a loved one could lose a significant percentage of their allowance to cover the costs of bus travel. Given the additional pressures of the cost-of-living crisis in Northern Ireland, this measure seems very ill-advised.

Perhaps of greater concern is the fact that this analysis by the Welsh Government anticipated that half of the older people who would no longer be eligible, would either choose not to travel or to use other means. Those who choose not to travel risk isolation and loneliness which, evidence shows, impact negatively on health outcomes. Those who would choose other methods of transport (most likely a car of their own, a friend, or taxi) runs contrary to policy intent on addressing the climate emergency.

12.0 Costs and Benefits

Age NI believes that the low level of savings which could be realised through the options for change, and the broad range of social benefits delivered by concessionary fares, indicate that this policy is providing very good value for money across a range of Government objectives. We recommend that a full cost-benefit analysis be completed and published for consultation before any policy decisions are taken.

Annex A sets out estimates of costs and savings associated with the options. The Department estimates that Options 1B and 1C would generate savings of £4.1m – 5.1m for 2024/25, which is overall 10% of the forecast cost of £44.5m for 23/24.

This is, arguably, not a significant reduction in cost but is probably an over-estimation of achievable savings. This would seem to be dependent on older people aged 60 - 64 continuing to use public transport at the same rate and paying full price. This is unlikely to actually happen and could result in the reduced projected income having to be off-set by an increase in the subsidy paid to Translink. Age NI therefore submits that for a saving of less than 10% of the current spend, there would be a significant loss and adverse impact across a whole range of social benefits.

Research shows that every £1 spent on concessionary fares for older and disabled people returns at least £2.87 in benefits.³¹

We believe that the proposal to achieve an estimated decreased cost of £4/5m is short-sighted. It runs contrary to wider strategic policy direction and ignores the clear benefits that this policy brings to individuals, the environment and the public purse. The short-term savings would be outweighed by longer term adverse impacts for individuals' health and wellbeing and public health and environmental factors such as increased congestion and poor air quality due to more cars on the roads.

³¹ Greener Journeys (2014). The costs and benefits of concessionary bus travel for older and disabled people in Britain; p.7; Available at: <http://bit.ly/2Mryoo6>

We note that the Department...

“recognises the importance of free and discounted travel in the everyday lives of older and disabled people...[and] understand[s] the important economic, social, and environmental benefits of the Scheme that go beyond the immediate benefits to concessionary fares passengers themselves...[making] a significant contribution to people’s lives here, as well as contributing to government’s wider social, economic, environmental, and public health goals.”

And while the Department states that these benefits are difficult to quantify, we note that the Welsh Government has conducted a cost benefits analysis of its CFS in 2019, and estimated benefits totaling £73.8m for the Welsh Government between 2012/22 and 2035/36.³²

13.0 Mitigations

The Department's EQIA recognises that raising the age eligibility for concessionary fares may have an adverse impact for those who are directly affected (particularly people aged 60 -6 4 on low incomes and those who are geographically isolated). It also considers that the increase is justified, because the CFS is not financially sustainable in its current format.

The EQIA suggests possible mitigations, namely, to apply the new age eligibility criteria to new applicants only or introduce the new age criteria gradually; and to continue to allow people with disabilities to travel at peak time travel. It states that mitigations may also be identified as part of the consultation process and will be considered during the policy development process.

From our engagement with a range of older people and professionals working in the age sector, Age NI offers some suggestions by way of mitigation.

Increased fares are recognised as a driver of increased costs. Perhaps some consideration could be given to improving offerings from Translink, comparing costs of operation and level of fares with providers in other jurisdictions.

Is there potential in reviewing the Department’s contract with Translink? Are there ways to make operations more cost-effective without impacting negatively on services, for example, through more digitisation, options for online applications, etc. mindful of the need to retain non-digital options for older people and others who require it?

³² <https://www.gov.wales/sites/default/files/publications/2019-07/public-transport-wales-bill-draft-regulatory-impact-assessment.pdf> - Proposed £73.8m total benefits for the Welsh Government between 2021/22 and 2035/36

The policy aim of the CFS is set out at pp14 of the consultation paper:

“to reduce social exclusion for members of the community who are most vulnerable, or liable, to social exclusion.”

It is clear that the CFS contributes to other departments’ and agencies’ objectives, for example, those led or supported by Communities, Health, Education, Economy, DEARA etc. Public policies including those promoting physical and mental health, reducing loneliness, and addressing the climate crisis can all benefit from effective and efficient transport services.

Age NI suggests that it would be possible for the baseline budget for the CFS to be supported by transfers from these and other departments and agencies. Several relatively small transfers could make up the £4/5m savings sought from the options, spreading the £4/5m across departments and agencies responsible for health, social care, loneliness, communities, active ageing, voluntary sector working in communities, childcare, rural matters, climate change etc.

Age NI recommends that the Department consider extending the CFS to return rather than single ticket journeys. This smaller scale potential mitigation could make considerable savings. For example, a single journey on a Metro bus is costed at £2.20. A day-ticket is £4.70. Therefore, if 3 or more single journeys are made in one day, the cost to the Department is more than a day-ticket would be.

“There are days when I make 6 single journeys, costing the Department £13.20 – compared to the £4.70 if I could have a day-ticket.” Older man

Similarly, a single journey from Belfast to Derry/Londonderry by either Ulsterbus or train costs £14. A return ticket is £21. With the SmartPass, two separate single tickets must be bought to make the return journey, costing the department £28 i.e. £7 more than a the price of a return ticket.

Therefore, modifying the scheme to enable the use of day-tickets and return tickets could potentially make meaningful savings. It also has the benefit of removing the added burden of having to purchase tickets for both legs of the journey as opposed to only once. If the return ticket option was available to older people and other groups, including those living with a disability, it would avoid the stress and congestion of additional queuing at ticket offices, and an additional pressure associated with each journey.

14.0 Option 2 - Limiting Use to Off-Peak Travel Only

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
Question 6	
Do you think SmartPass users who hold a disability- related SmartPass should be able to use their SmartPass before 09:30?	Yes
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 time?	N/A
Question 8	
If you wish to provide comments supporting your answers, please do so below.	See below

Age NI believes that the CFS should not be limited to off-peak travel only.

Many older people undertake childcare roles, travelling to the homes of their grandchildren in order to look after them and enable parents to get out to work. The introduction of off-peak use only would very likely reduce the level of grandparental support as it would necessitate the older person travelling before 9.30am.

The EQIA identifies this as causing a potential adverse impact on people with dependents, namely working parents. Employers for Childcare's *Northern Ireland Childcare Survey 2021* found that over half of households used grandparents to provide some or all of their family's childcare needs.³³

This policy may also have an adverse impact on women, who overwhelmingly undertake childcare and caring roles and who could be forced out of the labour market due to lack of affordable childcare.³⁴

Other older people contribute to the economy and support their own wellbeing and connectivity through volunteering, which can frequently require travel before 9.30am. The proposed change to off-peak travel only, would mean that the cost of travel for volunteering would therefore fall on either the traveller or the charity where they volunteer requiring them to pay travel expenses and this at a time when charities are under enormous financial pressures due to funding cuts.

“As a retired person I have the opportunity to contribute to society through a range of voluntary roles, often using the skills and knowledge I built up in my working life. This would be curtailed considerably if I was not able to use my concessionary pass to get to where I need to be.” Older woman

³³ <https://www.employersforchildcare.org/news-item/do-you-rely-on-grandparents-or-other-family-members-to-help-with-childcare-while-you-work/>

³⁴ <https://www.communities-ni.gov.uk/articles/gender-equality-strategy>

Older people also use the CFS to access work as they are still in employment, and it was noted that some older people were enabled to continue working thanks to the availability of the SmartPass.

“My friend works as a nurse. She has been able to continue working at a pace that suits her (3 days a week) because of being able to access free transport. If she was not accessing free transport, as she is unable to work 5 days per week, she would leave the health service and would be on benefits, reducing the health service workforce and no longer paying taxes.” Older woman

Several older people noted that limiting SmartPass use to off peak travel only would adversely impact older people living in rural areas, as they frequently have to leave for appointments in Belfast before 9.30am. This is particularly pertinent as many health services are being centralised, and as community transport is also experiencing significant cuts.

Age NI recommends that a Rural Needs Impact Assessment should be carried out to determine adverse impacts faced by these proposed budget cuts on older people and other groups living in rural communities.

There does not seem to be evidence that peak time services are currently impacted by people aged 60+, and neither does there appear to be any clear evidence that restricting the number of passengers in peak hours would reduce costs in a significant way. Any reduction would have to be made up by the Department paying an increased subsidy to Translink, due to reduced number of passengers, without any of the social benefits currently accrued.

We believe the anticipated savings of £600k cannot be justified given the loss of benefits that accrue elsewhere and the potential unequal impact on women and people with disability.

Restricting times of travel may also make journeys difficult and unaffordable for those older people on low incomes.

15.0 Option 3 – Limiting SmartPass Use to Bus Only Travel

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
Question 10	
Do you think SmartPass users who hold a disability- related SmartPass should be able to use their pass on rail?	Yes
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?	N/A
Question 12	
If you wish to provide comments supporting your answers, please do so below.	See below

Limiting concessionary travel to bus travel only could have an adverse impact on older and disabled people who mainly use rail services because it is more convenient for them. It also has the potential to reduce public transport accessibility for older people and people with disabilities who find some buses more difficult to use. Restricting the mode of travel may also make journeys difficult and unaffordable for those on low income.

16.0 Option 4 – Application, Renewal and Replacement Fees

Question 13	
Do you think that the Department should introduce a fee for a SmartPass	No
Question 14	
If you wish to provide comments supporting your answers, please do so below.	See below

A number of views were expressed in relation to the issue of fees.

“This proposal includes a replacement fee if the SmartPass is lost or stolen. There is no reference to the situation if the SmartPass is damaged. Over the years I have twice experienced a SmartPass ceasing to work when presented. In both cases, there was a tiny scratch on the magnetic strip. A replacement SmartPass was issued at no cost. So, under this proposal, will there be a fee if a SmartPass must be replaced because of damage?” Older man

One participant felt that charging a fee to apply may be worth considering, if it was linked to maintaining or expanding existing service provision and eligibility criteria. This person wished the Department to provide an analysis of the impact such income generation - estimated £600k – would have on maintaining or expanding existing service provision or eligibility.

17.0 PART B: Options to Promote Social Inclusion

Options 5 – 10, Questions 15 - 26

We note that the proposals set out in Part B of the consultation document are purely speculative at this time.

The Department *“recognises that it is not currently in a position to implement these changes in light of the significant financial challenges being faced,”* and that *“we are consulting on these options now to inform decisions on future changes to the Scheme should the Departments’ budgetary position change.”*

Age NI welcomes the intention to make the CFS more targeted at those groups of people it is intended to reach. We do, however, have some concerns about consulting on these proposals alongside those set out in Part A.

In our engagement exercises, concerns were expressed by older people and those working to support older people and our ageing population, that the Part B proposals could serve to be divisive and pit one vulnerable group against another. Therefore, until and unless the Department is in the position to fully resource and commit to implementing an extended policy, Age NI offers no comment on these proposals.

18.0 Conclusion and Summary

Age NI supports Option 1A set out by the DfI in its consultation paper – to make **no change** to the Scheme, leaving the age eligibility rules as they are now.

Age NI believes the Department should not proceed to make any of the changes outlined in Option 1 of the proposals.

Age NI rejects the proposals in Options 2, 3 and 4 to limit the use of the SmartPass and to introduce fees for the application, renewal and replacement of the card.

Age NI believes that the DfI policy on concessionary fares should be retained in its current form without any reduction in the eligibility criteria. We look forward to plans and proposals to extend the scheme to meet its policy aim of reducing social exclusion and will be happy to engage with the Department on those at the appropriate time and when more details are confirmed.

We submit that the direct and indirect benefits of the current scheme would significantly outweigh any potential economic savings, estimated in the policy proposal to be less than 10% of the current spend.

We recommend that a full cost-benefit analysis be conducted before any further action is taken by the Department. This policy is out of step with the Government's climate change agenda and other strategic and operational objectives.

The EQIA sets out a number of adverse impacts of the policy. Age NI submits that the mitigations offered would not go far enough and has submitted a number of constructive suggestions. We recommend, however, that the Department focus on alternative solutions and facilitate a wider conversation on what sort of transport system would best service the people of Northern Ireland.

Age NI will not comment on the speculative proposals outlined in Part B. We look forward to engaging with the Department when it is in a position to fully resource and commit to implementing an extended policy and CFS to meet its aim of reducing social exclusion.