

MANDATORY CONCESSIONARY FARES SCHEME IN WALES

Maintaining free bus travel for older people, disabled people and injured service veterans

Response to Welsh Government Consultation

1. Do you think that the Welsh Government should become the Travel Concession Authority for the administration of the All Wales Mandatory Concessionary Bus Travel Scheme in Wales, or should the functions remain with the local authorities?

Whilst local authority ownership and branding is a desirable feature, if as claimed more than £1m can be saved by a nationally administered scheme then it should be seriously considered. The consultation did not include an Impact Analysis to identify any adverse consequences of moving to a national scheme but if there are any, their impact should be taken into account. For example, local accessibility for face to face queries about their passes or getting new ones if the pass is lost could be important to some older people. There is no means provided of establishing the claim that £1m could be saved moving to a nationally administered scheme. Presumably this is an annualised saving; no implementation cost is, therefore, given. What would be lost to the current recipients of a bus pass if local schemes disappear? This needs a transparent evaluation of the potential cost savings that can be compared against the flexibility lost with the removal from the local level

2. Do you think that the eligibility age for older people who are new applicants to receive free bus travel should be increased to match the UK state retirement age in Wales, or be maintained at age 60 for men and for women?

There is no easy answer to this question. There is no state retirement age any longer. The consultation should have referred to state pension age. The bus pass is a popular and important initiative for many older people, particularly those on low incomes or who do not drive. Its sustainability into the future is the fundamental objective for older people. If a move to state pension age would help achieve that objective then it could be a price worth paying. With constraints on budgets, there would seem to be some logic in considering moving eligibility to the state pension age.

However, whilst the population is ageing and people are living longer, life expectancy across Wales varies considerably with some deprived communities having a significantly shorter life expectancy. Flexibility in the criteria for residents in deprived communities who are over 60 but under state pension age could be considered.

Similarly, isolation and loneliness are big problems for older people recognised by Welsh Government and some of those between 60 and state pension age could be adversely impacted by the proposed change. A response needs to be built in to the scheme that matches up with the new Welsh Government Strategy on Isolation and Loneliness.

The alternative option to the proposed change hinted at in the consultation is to make a sum payable for each journey using the pass. This would need to be kept at a nationally prescribed low figure e.g. 25% of the cost of the journey. The consultation does not provide any impact analysis of introducing part paid bus journeys with a pass nor about the costs of collecting the money but if that offers a solution that allows sustainability of the scheme without changing the age qualification then it should at least have been considered. Whilst it may be costly/difficult to administer linking part payment to whether the individual is unemployed and/or in receipt of benefits could mitigate adverse impacts on those who are on very low incomes between 60 and state pension age could be considered. Local flexibility of application would allow consideration for those living in deprived areas or facing logistical difficulties to reach important locations.

3. Do you think that the Welsh Government should maintain the entitlement for disabled people meeting the criteria to be issued with a free travel pass?

In principle yes of course and linked to the Section 18 Register of Disabled People in the Social Services and Well-being (Wales) Act 2014 or Blue Badge eligibility. However, if a part payment scheme was introduced for older people then the same should apply for disabled people – subject to the caveats mentioned above about those on low incomes. A detailed impact analysis might better allow an informed decision.

4. Do you think that the Welsh Government should allow more than one companion to travel with a disabled concessionary pass holder where more than one companion is needed to make travel by bus possible?

Except in exceptional circumstances this would appear to be too generous as a general rule and an opportunity for loopholes. In the few circumstances where “double-handling” is necessary the criteria should allow for special application to be made supported by a GP – as with the Blue Badge. There is no data provided to indicate how wide spread this option would be. This would be an obvious issue to deal with locally and sensitively and by application and justification.

5. Do you think that veterans meeting certain requirements should continue to receive a mandatory concessionary free bus travel pass at no cost?

Yes but subject to the same rules and caveats as above if a part payment scheme is introduced

6. Do you think that free bus travel should be extended to volunteers who volunteer for at least 30 hours a week?

No – this would be a minefield to police and add considerably to the costs of the scheme. A significant proportion of volunteers are in any case older people how would be eligible for a bus pass

7. Do you think that bus travel using a concessionary bus pass should allow free travel only during off-peak times, or should the ability to travel at any time be maintained?

It should be available at all times as a off-peak only pass would restrict the albeit smaller but still significant numbers (see consultation) of older people who use the bus at peak times. The question makes unsupported assumptions about the lives of older people about why and when they may want to use the bus. It would downgrade the effectiveness of the scheme in getting older people to live active lives that promote their well-being i.e. counter-productive for health and quality of life

8. Do you think that the Welsh Government should introduce an application fee to be paid by some applicants if the fee is limited to the cost recovery for receiving, processing, issuing and auditing passes?

This would on the face of it be a sensible measure but would need to be considered against the additional administrative costs of handling the revenue. The question only considers that “ a fee is limited to the cost recovery for receiving, processing, issuing and auditing passes”. If a fee were introduced, payment should be means tested and the administration of that would probably be exorbitant

9. If an application fee is introduced for a free bus travel pass, should it be paid by:

- a. Older people
- b. Disabled people
- c. Injured service veterans, or
- d. None of the above?

If introduced it should be applied for all categories on an equal basis.

10. Should the Welsh Government explore the extension of free concessionary bus travel scheme be to other modes of local transport services?

This should be considered in light of rurality impacts on all the client group categories, for Community Transport and in respect of the proposed Isolation and Loneliness Strategy. However, making the scheme unnecessarily complicated should be avoided. Duplication of the attractive Senior Railcard should also be avoided.