



Commissioner for **Older People**
for Northern Ireland

Department for Infrastructure
Public Transport Policy Division
Clarence Court
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Belfast
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niconcessionaryfaresconsultation@infrastructure-ni.gov.uk

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Re: Consultation on changes to the Concessionary Fares Scheme

Dear Sir / Madam

I am writing on behalf of the Commissioner for Older People for Northern Ireland (COPNI) regarding the proposed changes to the Concessionary Fares Scheme.

The Commissioner unequivocally opposes proposals for the narrowing of eligibility for the SmartPass (Option 1), while he supports the broadening of assistance to those with a disability (Options 5 and 6). The rationale for COPNI's position is outlined in detail below.

Breaking a Functioning System

The Consultation document summarises the benefits of the SmartPass as follows:

It enables many older people to live active, healthy, and independent lives, and participate more fully in the community, for example, through volunteering, continuing to work or providing childcare. Increased participation in society helps improve equality of opportunity and active ageing for older people. This can be particularly important for older people living in rural areas, those on low incomes and those who cannot drive or do not have access to a car. (p.15-16)

More broadly, the Concessionary Fares Scheme,

Generates considerable indirect benefits such as decongestion from journeys switched from cars to public transport, and benefits to the local economy from increased expenditure as a result of more frequent shopping and leisure trips. (p.8)

However, the Consultation document goes on to state that as the ‘costs of the Scheme will continue to rise significantly and if the Department does nothing and our budget does not increase, the Scheme will be unaffordable’ (p.17). The document’s argument is that despite the extraordinary social, health and economic benefits of the current SmartPass (and age criteria), that its scope should be reduced in order to make departmental savings.

This approach is wrongheaded for several reasons including:

A Demographic Requiring Support

The Consultation document adopts as its premise the view that citizens who are 60 plus are not a grouping worthy of additional support (p.2). Yet as older people experience higher levels of poverty and endure increased levels of serious long term health conditions, the removal of the 60+ SmartPass would, in fact, represent a choice against a vulnerable demographic.^{1 2 3}

Social, Health and Economic Value

Reducing eligibility for the SmartPass, no doubt has an attractive simplicity for the Department for Infrastructure, in that the savings to the Department are immediate and obvious. However, the social, health and economic value to society of retaining the 60+ SmartPass (e.g., older people providing childcare, attending hospital appointments independently, and participating in community organisations) is not considered in a meaningful way in the Consultation document.

The DfI’s case for reducing eligibility is based on an internal accounting approach — ‘*How much can be saved by this measure?*’. Yet, the DfI’s analysis does not

¹ According to the *Northern Ireland Poverty and Income Inequality Report 2021-22, Supporting Data Tables*, DfC, (2023), 19% of working adults over the age of 55 were considered to be in relative poverty, available at: <https://www.communities-ni.gov.uk/publications/northern-ireland-poverty-and-income-inequality-report-2021-22>

² Reporting of a limiting long-term health condition increases with age. 19% of people aged 16-24 report such a condition, compared with 40% in the 55-64 age category, *Health Survey Northern Ireland First Results 2021/22, Health Survey NI Trend Tables*, DoH, (2022), available at: <https://www.health-ni.gov.uk/publications/health-survey-northern-ireland-first-results-202122>

³ In *Health Survey Northern Ireland First Results 2021/22, Health Survey NI Trend Tables*, DoH, (2022), 19% of respondents aged 55-64 rated their general health as ‘bad’ or ‘very bad’, the highest percentage of all adult age groups, available at: <https://www.health-ni.gov.uk/publications/health-survey-northern-ireland-first-results-202122>

offer a detailed view of the overall social, health and economic benefits accrued to the whole of society through the 60+ SmartPass and therefore, it ignores the potential damage caused by the withdrawal of the Pass.

Citizens and Taxpayers

The Dfl states that the 60+ SmartPass provides ‘free travel for those aged 60-64 years of age [and] is more generous than the mandatory concession offered’ in other jurisdictions (p.15). Individuals who use the 60+ SmartPass are citizens who have spent their lives paying taxes for the good functioning of the state, including the provision of infrastructure. In this sense, the 60+ SmartPass is a benefit earned by lifelong taxpayers and is not ‘free’.

Indeed, noting that the scheme is ‘more generous’ than other jurisdictions ignores the fact that when compared with other OECD countries, the UK is among the least ‘generous’ when it comes to state pensions and benefits.⁴ The 60+ SmartPass is a modest support to a cohort who are approaching pension age, but which offers enormous return on investment.

Sustainable Public Transport

The *Dfl Strategic Framework* states that ‘Infrastructure investment can help mitigate the effects of climate change. It helps ... encourage sustainable forms of transport to help reduce emissions’ (2023, p.2). Therefore, it is extraordinary that a proposal under consideration by Dfl is to withdraw a measure (the 60+ SmartPass) which encourages the use of public transport and walking.

In an era when other European jurisdictions are increasingly removing charging for public transport—aware of its role in creating a healthy society—it is irrational for a government department here to consider hindering our vital transition to public transport.⁵ A society and government which are serious about reducing the

⁴ See *Pensions: International Comparisons*, House of Commons Library, March 2022, available at: <https://researchbriefings.files.parliament.uk/documents/SN00290/SN00290.pdf>

⁵ See *These European Countries are Offering Free Public Transport to Help Combat Air Pollution*, Condé Nast Traveler, 2022, available at: <https://www.cntraveler.com/story/free-public-transport-is-a-growing-trend-in-europe>

impacts of Climate Change must make public transport more appealing and accessible.

A Collaborative Social Model

The Consultation document states, 'we have looked at the Scheme to identify changes to the current eligibility criteria which could reduce the costs of the Scheme while ensuring it continues to be targeted on those who are most vulnerable, or liable, to social exclusion' (p.2). The implication of the document's subsequent proposals (broadly, to cut the 60+ SmartPass and increase supports to disabled passengers) is that this is a choice or competition between two demographics – people aged 60 plus versus people with a disability.

This is a false dichotomy for several reasons. Firstly, a civilised society does not support one marginalised grouping by reducing support to another group. Increasing high quality accessible public transport for all groupings should be the aim—not reducing what we already have.

Secondly, many people in the 60-64 age bracket have a health condition that hinders their daily lives and would therefore require other support with transport (if not for their SmartPass) due to their health condition.⁶ Consequently, COPNI would welcome the adoption of 'Option 5 – Free travel for those currently receiving a half fare concession due to a qualifying disability' and 'Option 6 – Companion passes for disabled people unable to travel alone.'

Summary

Regarding the possibility of retaining the 60+ SmartPass in its current form, the Consultation document dismisses this as follows:

This policy option of 'do nothing' ... arguably represents a poor targeting of limited resources and is potentially inconsistent with the policy aim of reducing social exclusion. (p.17)

⁶ Significantly, many people who are currently eligible for the 60+ SmartPass have a serious medical condition. 40% of people in the 55-64 age category report having a limiting long-term health condition, *Health Survey Northern Ireland First Results 2021/22, Health Survey NI Trend Tables*, DoH, (2022), available at: <https://www.health-ni.gov.uk/publications/health-survey-northern-ireland-first-results-202122>

Yet, no convincing evidence for the removal of the 60+ SmartPass is offered in the Consultation document by way of illustrating poor targeting of resources. The sole technical argument for cutting the 60+ SmartPass is that it resolves an internal departmental expenditure issue (S 2.14).

Troublingly, this leads to the most harmful aspect of these proposals. COPNI readily accepts that the Department faces serious financial pressures, must plan accordingly, and must make 'tough choices'. However, lost in the accompanying language of 'unavoidable' austerity is that 'the options' outlined in the Consultation are in fact, choices, which a government department has identified. The proposals contained in the DfI Consultation document to reduce eligibility for the SmartPass amount to a government choice against older people.

The proposal to reduce eligibility to the SmartPass scheme would reduce or halt access to public transport provision for many older people. The office of the Commissioner for Older People for Northern Ireland rejects, without caveat, such proposals which would visit disproportionate harm on older people and undermine the principle of equal citizenship.

Best wishes

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