# Appendix 1: Respondent Information Form

**PLEASE NOTE THIS FORM MUST BE RETURNED WITH YOUR RESPONSE**.

Are you responding as an individual or an organisation?

☐ Individual

√ Organisation

Full name or organisation’s name

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The Scottish Government would like your permission to publish your Consultation

response. Please indicate your publishing preference:-

√ Publish response with name

☐ Publish response only (anonymous)

☐ Do not publish response

We will share your response internally with other Scottish Government policy teams

who may be addressing the issues you discuss. They may wish to contact you again

in the future, but we require your permission to do so. Are you content for Scottish

Government to contact you again in relation to this Consultation exercise?

√ Yes

☐ No

# Part 2 – Questions on options

**No change to age eligibility of the Scheme**

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| Should scheme eligibility remain unchanged ? |  |
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| Do you believe that age eligibility for the Scheme should remain as it is? At present everyone resident in Scotland can get the bus pass on their 60th birthday and be able to travel for free at any time of day, for any number of journeys, on local and long distance scheduled bus services throughout Scotland.Scheme costs have risen over the years to a little over £190 million in 2016-17. In addition, some 70,000 of us reach age 60 each year and that figure is projected to rise to 76,000 by 2021. This adds further pressure to costs, raising questions about the longer-term sustainability of the Scheme in its present form. Even if your first preference is to make no changes to age eligibility at this time, please consider the options set out in questions 2 and 3 below. |
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| Question 1  |
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| Do you think that we should retain the existing age eligibility criteria for the Scheme?  | Yes | ☐ | No | √ |  |
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| Please use the box below to provide details. |
| My comments:HITRANS recognises many of the benefits which the existing eligibility for concession card holders has brought and also some of the potential problems that may arise from increasing the age eligibility criteria for the scheme including the potential pressure that reduced revenue from this cohort may put on a number of marginal services. However, as pension age rises there is less need for a free concessionary scheme to start at age 60 and in a world of finite finances, HITRANS would argue that the cost saved could be better directed to assist the most transport-deprived sectors of the population. Further comments on this topic are given under question 6.We propose raising the entitlement age for the older person scheme to 65 in line with the rise in pension age and the phased raising of the entitlement age for the scheme in England. This should address issues of high levels of mobility amongst those aged 60-65, including in many cases when this age group is still in employment, and is therefore often using the free bus entitlement for travel to and from work. This will inevitably be at a significant cost to the scheme. In responding to this consultation HITRANS has undertaken some research based on the usage of the current scheme in 2016. This research is summarised in the table included at the end of this consultation response. This highlights that the average number of trip per person over 60 within each Local Authority area ranges from 35.25 in Edinburgh to under 4 trips per resident over 60 in Orkney and Comhairle nan Eilean Siar. Extrapolating the percentage of the National Concession scheme spent in each Local Authority area based on the number of journeys undertaken highlights how the current scheme disproportionately benefits urban areas. From the data provided services operated in Highland Council area only receive 1.8% of the share of the overall Concessionary budget despite a population share of c4.3%. This compares to Edinburgh’s 17% share for only a 9.5% share of the overall population. This imbalance needs to be addressed.  |

**Options to change the National Concessionary Travel Scheme**

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| Raise the age of eligibility for men and women to the female State Pension age in one step |
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| What is it? | Women’s State Pension age is being equalised with men’s, so that they will reach State Pension age at 65 from November 2018. In addition, both men’s and women’s State Pension age is due to increase to 66 by 2020 and to 67 between 2026 and 2028.The proposal would set the age of eligibility for free bus travel at female State Pension age from 2018. |  |
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| What does it mean for me? | The UK Government provides a handy calculator to check when you will reach State Pension age:-[www.gov.uk/state-pension-age](https://www.gov.uk/state-pension-age) |  |
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| What will it cost or save? | If age eligibility is raised immediately to female State Pension age from April 2018 onwards, it would reduce costs by around £10 million in the first year, increasing to around £65 million by 2022-23.The State Pension age will increase to 66 by 2020 and 67 between 2026 and 2028. In 2023-24, this would result in savings of around £83 million each year, increasing up to reduced costs of around £111 million in 2026-27. |  |
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| What is the justification for claimed costs/savings? | Raising the eligibility age reduces the number of cardholders, resulting in fewer journeys which also reduces the cost to the Scottish Government. In 2022-23, there would be around 350,000 fewer people eligible compared to what would happen if the current age of 60 was to be maintained. In 2026-27, this would increase to around 520,000 people |  |
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| Question 2 |
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| Are you in favour of raising age eligibility to female State Pension age in this way? | Yes | √ | No |   |  |
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| Please explain your answers.Yes HITRANS would support this proposal as per our response to Question 1  |

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| Raise the age of eligibility to the female State Pension age over a number of years  |
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| What is it? | Women’s State Pension age is being equalised with men’s, so that they will reach State Pension age at 65 from November 2018. In addition, both men’s and women’s State Pension age will increase to 66 by 2020 and to 67 between 2026 and 2028.Age eligibility could be increased towards the (female) State Pension age either:-* by one year per year; or
* by six months per year
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| What does it mean for me? | A slower introduction might mean that people affected by the change in the early years will be eligible for their bus passes after age 60 but before the female State Pension age.If raising the age of eligibility is done progressively for those who are currently in their mid to late fifties, it might be done in one of two ways:-(A) If the eligible age was raised by **one year annually**, this would increase the age at which people in their late 50s would receive their bus pass but will not mean that they will have to wait until they are at State Pension age. A person who reaches age 59 in 2017 would become eligible for their bus pass on their 61st birthday in 2019, a person who reaches age 58 in 2017 on their 62nd birthday in 2021, a person who reaches age 57 in 2017 on their 63rd birthday in 2023 and so on. A person aged 54 or under in 2017 would become eligible on their 66th birthday.(B) If the eligible age was raised by **half a year annually**, this would again increase the age at which people in their late 50s will receive their bus pass, but at a slower pace. A person who reaches age 59 in 2017 would become eligible six months after their 60th birthday, a person who reaches age 58 in 2017 on their 61st birthday, a person who reaches age 57 in 2017 six months after their 61st birthday and so on. A person aged 48 or under in 2017 would become eligible on their 66th birthday.If the age of eligibility is simply raised without any adjustments or phasing, then someone who is 59 in 2017 would become eligible in 2024 when they reach the State Pension age. This approach would seek to address the issue raised by WASPI and mitigate the effects of the changes on people close to the current age of eligibility by striking a better balance between the size of the change and the period of notice. |  |
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| What will it cost or save? | Raising age eligibility from April 2018 by one year per year to female State Pension age would reduce costs by around £11 million in the first full year, increasing to around £40 million by 2022-23.The slower of the two progressive approaches would reduce costs by around £5 million in the first full year, increasing to around £27 million by 2022-23. |
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| What is the justification for claimed costs and savings? | Raising the eligibility age reduces the number of cardholders and hence the number of journeys and also costs to the Scottish Government. For example, if the age is raised by half a year per year, there are projected to be around 157,000 fewer people eligible by 2023-24 compared to what we would see if the current age of 60 was maintained.

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| Potential annual cost reductions (£million) | 2018-19 | 2019-20 | 2020-21 | 2021-22 | 2022-23 |
| (A) Age eligiblity + 1 year | £11m | £11m | £24m | £25m | £40m |
| (B) Age eligiblity + 0.5 year | £5m | £11m | £12m | £19m | £27m |

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| Question 3 |
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| Are you in favour of raising age eligibility to female State Pension age gradually over time? | Yes | √ | No | ☐ |  |
| At what rate? | By 1 year per year |   | By half a year per year | ☐ |  |
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| Please explain your answers.HITRANS would support a phased increase in the eligibility by one year each year as the most practical means of introducing this transition in eligibility. A similar approach was adopted by Orkney Islands Council in respect of their own local concessionary entitlements and proved successful. |

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| Free bus travel for Modern Apprentices |
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| What is it? | Young people undertaking Modern Apprentice frameworks registered with Skills Development Scotland would be able to get free bus travel. The offer might be targeted at those Modern Apprentices under age 21. |  |
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| What does it mean for me? | If you are a qualifying Modern Apprentice you would be able to get free bus travel.  |  |
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| What will it cost or save? | It would cost approximately £8m per year to provide free bus travel to Modern Apprentices under 21. Applying it to all Modern Apprentices would roughly double that figure. |  |
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| What is the justification for claimed costs/savings? | There are around 20,300 Modern Apprentices aged 16-20. Based on the travel behaviour of people in this age group and the estimated uptake of the card, this would cost an estimated £8 million per year. |  |
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| Question 4 |
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| Are you in favour of providing free bus travel to Modern Apprentices? | Yes | √ | No | ☐ |  |
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| Should this be targeted at Modern Apprentices under Age 21? | Yes | ☐ | No | √ |  |
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| Is there a better way to provide support to help with the travel costs of Modern Apprentices?If so, please specify below. | Yes |   | No | ☐ |  |
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| Please explain your answers.HITRANS is in favour of providing free bus travel to Modern Apprentices. Young people accessing full or part-time employment should receive assistance with bus fares which can, particularly in an area like the Highlands and Islands, be a significant barrier to them applying and / or retaining a job.This proposal should not just be targeted at those under age 21 but to all those undertaking Modern Apprentice frameworks. Furthermore, HITRANS seek to highlight that in the majority of the Highlands and Islands the number of young people with access to modern apprenticeship frameworks is very low. Therefore we would propose that when considering extending free bus travel to modern apprentices that a fairer option would be to we seek an extension to the pass for All job seekers attending interview or during the first month of employment. |

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| Companion cards for disabled children under age 5 |
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| What is it? | Allow disabled under 5s to get a companion card where this is needed so that their parent/carer can travel for free. Under 5s cannot get a disabled persons bus pass as they generally travel for free.  |  |
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| What does it mean for me? | The parent or carer accompanying the child currently has to pay for their own travel until that child qualifies for a companion card on their 5th birthday. This would allow the parent or carer to travel with an eligible disabled child under 5 for free. |  |
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| What will it cost or save? | We believe that there around 3,210 disabled children under 5 who might benefit from a companion card. This will cost just over £600,000 per year. |  |
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| What is the justification for claimed costs/savings? | There currently are around 3,210 children in Scotland who are eligible for the Higher or Middle rate Care Award and/or the Higher rate mobility award of Disability Living Allowance (DLA). Based on the average numbers of journeys taken by bus pass holders and the current reimbursement cost this would cost just over £600,000 to provide equal access to companion cards for disabled children of all ages. |  |
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| Question 5 |
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| Are you in favour of providing a companion card for disabled under 5s where this is needed? | Yes | √ | No | ☐ |  |
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| Please explain your answer.HITRANS supports the proposal to address this anomaly in the current scheme. |

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| Are there any other issues you wish to raise which are not covered above? |  |
| The Scottish Government welcomes any further comments and suggestions on the Scheme and how it might be improved or made more sustainable. |
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| Question 6 |
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| Do you have any other comments about any of the issues raised in this consultation? | Yes | √ | No | ☐ |  |
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| If so, please use the box below to provide details. |
| My comments:HITRANS welcomes the Scottish Government commitment ‘to continuing to provide free bus travel for those who need it most’. However, there are a number of areas where the scheme should be realigned if it is to satisfy this objective. * The existing scheme benefits urban areas disproportionately and there could be an opportunity to ensure the benefits of the scheme are shared more equitably by implementing reforms to ensure the bus elements of the scheme deliver better value for money with the opportunity to use resource savings to extend the scheme to community transport and increase the opportunity of island resident to have more frequent free ferry travel particularly where the ferry is the only public transport option available for travel to main local centres.
* Affordable fares are necessary to promote modal shift, and to provide mobility/social inclusion to people on low incomes. It seems unfair that in its current form the Scheme provides unlimited travel by bus on a basis that could amount to multiple trips per day in urban areas such as Glasgow, Edinburgh and Inverness while residents of rural areas have either no access to any means of public transport, or at best access in their area is provided by a not for profit voluntary community transport group, organisations which are eligible for reimbursement through the current scheme unless they operate as a registered service. In the case of island areas the only means of travel for access to health or other community facilities can be by ferry, where any limited concession they receive is funded locally by the Council. There should be recognition of the inadequacies of public transport in rural areas and the role played by community transport and ferries as often being the only option available to National Entitlement Card holders for travel but these are excluded from the scheme.
* Use card information to equate reimbursement to multi journey tickets. Technology in the new generation of concessionary travel card and electronic ticket machines is Smart and should allow analysis of the way in which the concessionary traveller makes use of their concessionary travel pass. For example, if the concessionary traveller makes multiple journeys during the course of the day whereby a multi-journey ticket would be cheaper than multiple single tickets, consideration could then be given to reimbursing the operator on the basis of a proportion of the multi-journey ticket rather than always on the price of single journey tickets. Smart technology should also enable the scheme to be extended to include rail transport from the nearest station to either, a regional centre, or alternative location where Concessionary travel is available from, for any resident where their local rail station is the only mode of public transport available.
* Fairer treatment of ferry passengers to reflect their function as equivalent to a bus. Across Scotland there is a combination of local ferry services and Mainland ferry services. The former connect typically smaller isles to their nearest service centre, for example, the connections between the isles in Orkney and the Orkney Mainland. The Mainland connections tend to connect larger community centres to Scottish Mainland. At present, the national concessionary travel scheme only applies to the connections to the Scottish Mainland, typically on services funded directly by the Scottish Government, with the entitlement being to up to two free return journeys per annum. Consideration should be given to extending this entitlement to cover all ferry services in Scotland, in response to a recognition that these ferry services provide an equivalent function to local bus services and long distance coach services. This would also give the opportunity to unify the concessions that apply across all ferry services, so residents in all areas of Scotland with ferry services are afforded the same concessions, as is the case with bus/coach services. Different ferry services function for different reasons, ranging from local access to jobs, shopping, healthcare etc., which will tend to generate a high frequency of travel, to connections which are made less frequently, perhaps 2-6 times per annum to visit friends and families, go on holiday etc. Clearly there is a need for further work in determining what would be an appropriate level and rate of concession for ferry services, but the examples of what local authorities already provide offer a useful starting point.
* Consider how to include rail particularly the blind persons’ scheme and whether this should be managed as part of the national scheme.
* Blue Badge as a measure of entitlement. Other schemes in the UK do not accept the Blue Badge on its own as an entitlement criteria, particularly noting that a Blue Badge can often be issued for temporary rather than permanent disabilities. The Blue Badge scheme is intended to allow people with severe mobility problems who have difficulty using public transport to park for free and to park close to where they need to go. On this basis the Blue Badge scheme is clearly not a useful measure for applying to a public transport, whether it be bus or ferry for example, concession.
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# Part 3 - Assessing impact

## Equality

1. In considering possible changes to the National Concessionary Travel Scheme in Scotland the public sector equality duty requires the Scottish Government to pay due regard to the need to:
* eliminate discrimination, victimisation, harassment or other unlawful conduct that is prohibited under the Equality Act 2010;
* advance equality of opportunity between people who share a protected characteristic and those who do not; and
* foster good relations between people who share a relevant protected characteristic.
	1. These three requirements apply across the ‘protected characteristics’ of:
* age;
* disability;
* gender reassignment;
* marriage and civil partnership;
* pregnancy and maternity;
* race;
* religion and belief; and
* sex and sexual orientation.
	1. At this early stage it is difficult to determine whether significant effects are likely to arise and the aim of the Scottish Government is to use this Consultation process as a means to fully explore the likely equality effects, including the impact on children and young people.
	2. Once completed the Scottish Government intends to determine, using the consultation process, any actions needed to meet its statutory obligations. Your comments received will be used to complete a full Equality Impact Assessment (EQIA) to determine if any further work in this area is needed.

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| Question – Equality Impacts |
| Are there any likely impacts the proposals contained within this Consultation may have on particular groups of people, with reference to the ‘protected characteristics’ listed above? Please be as specific as possible.No comments to add |

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| Question – Children and young people |
| Do you think the proposals contained within this Consultation may have any additional implications on the safety of children and young people? No |

## Business and Regulation

* 1. A Business and Regulatory Impact Assessment (BRIA) will analyse whether the proposals are likely to increase or reduce the costs and burdens placed on businesses, the public sector and voluntary and community organisations.

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| Question – Business impacts |
| Do you think the proposals contained in this Consultation are likely to increase or reduce the costs and burdens placed on any sector? Please be as specific as possible. The proposals to change age eligibility will lead to a reduction in Scheme members and therefore a reduction in trips which may have significant impact on marginal commercial services. Any reduction in current usage by Scheme members and in reimbursement to the operator could lead to deregistration of journeys/routes leaving their replacement an issue for the public sector. The replacement of any current commercial services in our area would require significant public subsidy  |

## Privacy

* 1. A full Privacy Impact Assessment (PIA) will be conducted to ascertain whether our proposals on delivering a consistent approach to the Scheme may have an impact on the privacy of individuals.
	2. At this early stage it is difficult to determine whether significant privacy impacts are likely to arise and the aim of the Scottish Government is to use this Consultation process as a means to fully explore the likely privacy effects.

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| Question – Privacy impacts |
| Are there any likely impacts the proposals contained in this Consultation may have upon the privacy of individuals? Please be as specific as possible.No |

Transport Scotland 2017

# Annex C

# Options not favoured by the Scottish Government

A number of those with whom we have engaged in preparing this Consultation indicated a first preference for maintaining the current age of eligibility or, if changes had to be made, for alternative approaches to be taken. For a variety of reasons the Scottish Government is not minded to adopt these but they are listed below for information: -

1. **Requiring card holders to make a small financial contribution towards the cost of each concessionary journey.**

A fixed contribution of, say, 20p, 50p or £1 would be required to be paid for each journey undertaken. This would be relatively simple to implement and would generate significant savings. For example, a contribution of 20p per journey could save up to £17 million annually if applied to all concessionary passengers, including disabled bus pass holders as well as those qualifying on age. (Requiring a contribution only from non-disabled pass holders would reduce savings by about 10%.)

1. **Levying an annual charge for access to free bus travel.**

The journeys themselves would be free but there would be a fixed annual fee, for example £10 or £20. In effect, this would be like having an annual very low cost season ticket valid on all buses. Based on current usage, annual savings could be up to £13 million with a £10 charge and proportionately more for higher charges. Excluding disabled bus pass holders from the requirement to pay a charge would reduce savings by about 10%.

The Scottish Government does not favour either of these two options because they would not be consistent with the commitment set out in the Programme for Government 2016-17 to provide free bus travel for older and disabled persons. Option 1 could additionally lengthen boarding times and Option 2 would require new administrative arrangements, for example to issue reminders and process forms.

1. **Restricting use of a bus pass during peak travel times.**

Limiting the use of the bus pass to off-peak travel might save costs by encouraging people to travel at times when bus services tend to be less busy. This can reduce costs for bus operators and possibly alleviate overcrowding at peak times. However savings might be limited if people simply travel at different times and there could be delays to boarding times if disagreements arise over whether a journey is peak or off peak.

1. **Having a cap on the value of individual journeys which can be free.**

For example, all journeys made in a year up to an overall limit, such as £250, would be free. Travellers would have to pay for any additional journeys beyond this point until the end of the year. The level of savings would depend on the limit set but such an arrangement would allow costs to be controlled without the need for the present reimbursement capping arrangements. However new systems would be required to administer such an arrangement, including enabling passengers to tell easily how much travel they were still entitled to.

The Scottish Government is not minded to pursue either of these options at this time given the potential implementation and operational issues.

You may wish to use the box below to provide comments on these or any other way in which you believe the long-term sustainability of concessionary travel could be achieved, as well as other comments you may wish to make for improvements to the scheme.

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| My comments:In responding to some of the proposals referenced above HITRANS would refer to some of the information provided in Question 6 but also these specific comments below;Consider introduction of an upper rate on the value of the ticket reimbursed. The price of bus fares across Scotland varies significantly, and so therefore do reimbursements. As the scheme is also applicable on long-distance coaches, fares on such services will be significantly above those of local bus services on shorter sections of the route. The scheme could be capped to prohibit use on the longer-distance services, however in the Highlands and Islands region it will be important to be mindful that some 'local bus services' will cover significant distances or the only bus service available for travel will be a longer distance coach route which includes as part of its route a rural settlement, and may therefore have relatively high fares, which we would not want to see excluded from the scheme. Introduce a maximum value to be stored on each card. The current scheme offers unlimited free travel to each user. An alternative would be to consider free travel, but with a limit or cap on, say, an annual basis. This would effectively cap the upper budget limit of the scheme dependent upon the size of population eligible for concessions. Under such a capped scheme, some existing users would inevitably see a reduction in the amount of free travel that could be made, but there could at least be consistency across the country, and an advantage could be a development of the scheme to be applicable to both community/voluntary transport schemes and ferry services, as for each individual concessionaire they would still have to remain within the annual value of the card to travel for free.  |

