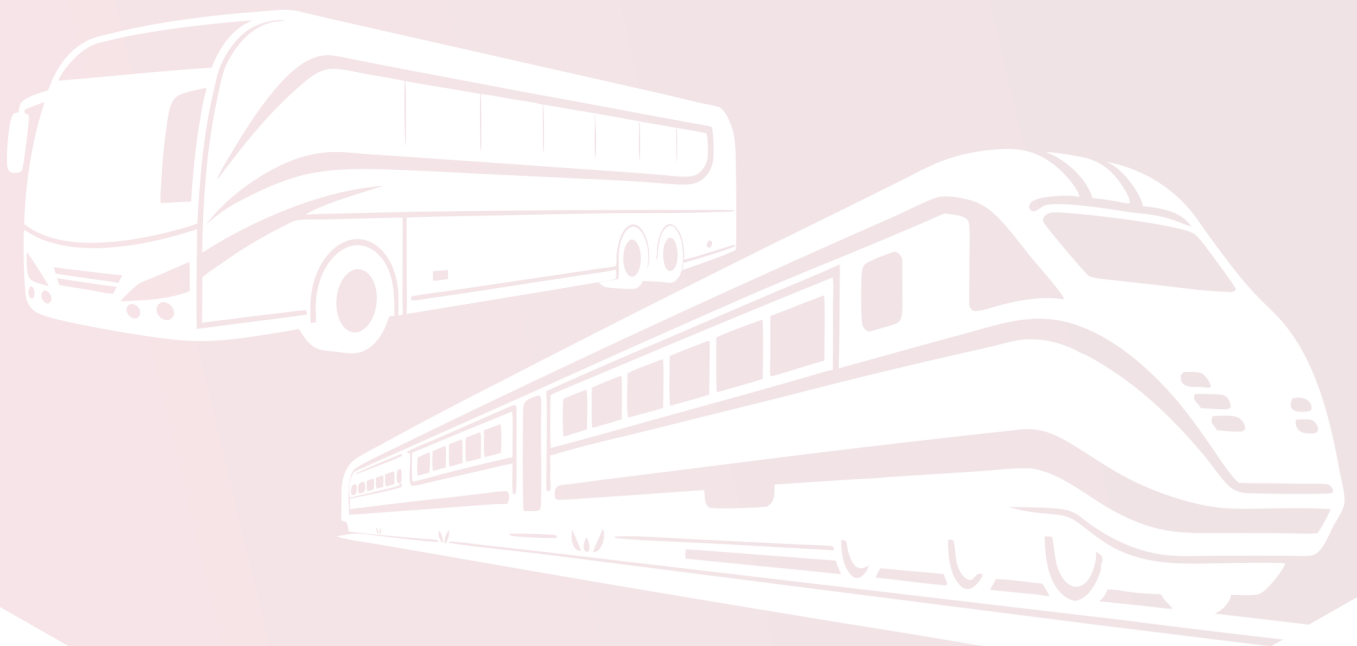


Response to the Department for Infrastructure's Consultation on "Free and Discounted Fares on Public Transport (Concessionary Fares)"



Introduction

1. NIPSA is the largest Trade Union in Northern Ireland representing over 43,000 members, employed across the whole of the public service, in organisations such as the Northern Ireland Civil Service and its Agencies, Local Government, Education, Health and Social Care, the Northern Ireland Housing Executive as well as a host of Non-Departmental Public Bodies (NDBPs). NIPSA also represents a significant number of members in the community and voluntary sector. The following comment on this consultation may also be supplemented by a contribution from NIPSA's Retired Members' Group.

2. Before comment on the specific questions raised within the consultation¹, it is important to challenge the limitations of these and other consultations that are currently being undertaken in the absence of a local Executive and shaped by the "punishment budget" approach from the Secretary of State for Northern Ireland and the Northern Ireland Office. This frames all economic discussion within a prejudice that: we as a local population are somehow "pampered" by the public services that are currently on offer; that such "living beyond our means" has to stop and that the only question that matters, therefore, is "what would you cut?".

3. NIPSA has never accepted the "there is no money" lie of austerity that this approach reflects. We were right to challenge this narrative a decade ago when as taxpayers we were forced to pay the price of rescuing the banks from their own greed and recklessness and are right to do so now as we are subjected to the neo-austerity of the Treasury/Bank of England's assault on our living conditions. We shouldn't lose sight of the fact, therefore that while the absence of a power-sharing local Executive rightfully attracts attention, even if it were in place, the needs-based, long-term structural funding we require is delivered at a central (government) level with the regressive tax and spend behavior of the Treasury the cause of the staffing and delivery crises throughout our public services.

4. Many of those who are now of pension age with access to a public sector occupational pension will remember how the suppression of pay during their working lives was justified by the employer (Government) who stated "pay" was only one component of an overall package, a key part of which was their pension, sometimes described as "deferred pay". This,

¹ <https://www.infrastructure-ni.gov.uk/sites/default/files/consultations/infrastructure/nicfc-2023-ni-concessionary-fares-schemer.PDF>.

they were promised, would ultimately synchronise with and be enhanced by a wider social security support that they had also paid into throughout their lives and that all of this would be available at a “fixed” forecast point of retirement. As we know from bitter experience however – not only has there been an assault on pensions that demands workers contribute more to them, do so for longer and get less out of them on retirement– the age at which a state pension can be accessed has continually been pushed back and these wider safety nets diluted or removed. Exemplifying how insult is added to such injury we now have a threat to the “free and discount fares” that presents such a “prize” as “unaffordable”.

5. Most people will be familiar with Oscar Wilde’s definition of a cynic as someone who knows the “price of everything and the value of nothing” but the ultimate cynicism shown by this consultation is that it “knows” and *documents* substantial “value” yet *still* proposes “cuts”. For example, in detailing the benefits of the SmartPass the consultation states that: “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.”² Similarly, the indirect benefits of Concessionary Fares are listed including: “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.”³

6. Despite these direct and indirect benefits, the “price” of the policy status quo is treated as “unsustainable”. This is a nonsense. For example, if, **for such a relatively small investment, a new** policy was being proposed that could offer: greater independence and support to a particular strand of our society; facilitate them continuing to play a full part in and access the society to which they have contributed so much for decades and supported the wider necessity of a greener transport system – would we not see finding the money to support it as essential?

² Ibid pp.15-16.

³ Ibid p. 8.

7. Another striking aspect of the consultation is its failure to look more widely at other jurisdictions. While reference is made to England, Scotland, Wales and the Republic of Ireland in relation to access to concessionary travel (at 66, 60, 60 and 66 respectively) and reference to Scotland, Wales and the Republic of Ireland having no “time restriction” on such concessionary travel, the wider regional, national (Scotland’s free bus travel for those under 22 for example) and international approach to subsidised public transport **for all citizens** would best inform this debate. Indeed, beyond the explicit benefits that we discuss within this response – another advantage of a wider interventionist approach currently being taken in Spain, for example, is that the control of public transport fares is one of a number of government interventions (capped energy prices, tax of excess profits, limits on how much landlords can raise rents etc.) that can be used to control inflation.

8. Instead of a broad, international, public transport/social policy debate about how such social good could be expanded, the DFI’s reassessment of the “free and discounted fares” concludes with a **headline aim** of reducing funding for and (therefore) the discontinuation/restriction of concessionary travel in particular as it relates to those who reach 60 years of age. The consequence of such “proposals which reduce the concession available” are highlighted in the EQIA as having the “potential to have an adverse impact on people’s economic, social, and cultural life as well as to exacerbate health inequalities for Section 75 users and impact on wider economic growth.”⁴

9. We are trapped, therefore, in the ridiculous “robbing Peter to pay Paul” approach of being invited to suggest “which elements of our society should suffer first?” This race to the bottom involves acknowledging that some of those over 60 years of age *can* face social exclusion yet because this is less than that experienced by those aged 65+ they can take the first “hit”, implying that such initial harm can be swiftly reversed. This is why NIPSA rejects the consultation’s framing of the status quo (the “do nothing” to the current policy) as the “poor targeting of...resources...potentially inconsistent with the policy aim of reducing social exclusion”.⁵ Such “penny pinching” only shifts the debate in one irreversible direction and has already led to farcical claims that the “saving” achieved by cutting this scheme might deal

⁴ <https://www.infrastructure-ni.gov.uk/sites/default/files/consultations/infrastructure/nicfc-draft-eqia.PDF> pp. 19-20.

⁵ <https://www.infrastructure-ni.gov.uk/sites/default/files/consultations/infrastructure/nicfc-2023-ni-concessionary-fares-schemer.PDF> p.17.

with the wider structural problems flowing from decades of underinvestment in our public services. Incredibly, within this consultation timeframe, a media discussion of the issue even suggested that the savings from the scheme's abolition would shorten our shamefully long hospital waiting lists.⁶

10. The attack on the "Concessionary Fares Scheme" also reinforces a general lack of policy coherence. For example, amidst wider discussion across society about the importance of social inclusion on health (including mental health) and on addressing manifestations of poverty, a policy that would clearly have a detrimental effect on the vulnerable is proposed. For example, this threat to the concessionary fares policy takes place despite the evidence, as pointed out by the Commission for Older people for Northern Ireland⁷ that 19% of working adults aged over 55 live in relative poverty,⁸ 40% of this over 55 demographic endure a limiting long-term health condition⁹ and 19% of respondents aged 55-64 rate their general health as 'bad' or 'very bad'.¹⁰

11. This negative impact of what is being proposed is captured more fully in the Department's own EQIA¹¹ and for this reason we oppose those measures that are identified as having an adverse impact and support those measures that are identified as having a positive impact on the Section 75 Equality categories.

12. On this basis therefore we **reject**:

Option 1B and C on "Raising age eligibility" that **adversely affects** the Equality categories relating to "Age" and "those with dependents."

Option 2 – on "Limiting SmartPass use to off-peak travel" that **adversely affects** the Equality categories relating to "Age", "disability" and "those with dependents".

Option 3 – on "Limiting SmartPass use to bus travel only" that **adversely affects** the Equality categories relating to "Age", "Disability" and "People with Dependents".

Option 4 – on "Application, renewal, and replacement fees" that has a "Minor" **Adverse effect** on the Equality categories relating to "Age" and "Disability".

13 On a without prejudice basis to what we believe should be the fullest review and enhancement that delivers a progressive public transport system, we support the following proposals within the consultation:

⁶ <https://www.bbc.co.uk/sounds/play/m001pdn5> 10/8/23.

⁷ <https://www.copni.org/media/1931/july-2023-dfi-concessionary-fares-consultation-response.pdf> 3/7/23.

⁸ <https://www.communitiesni.gov.uk/publications/northern-ireland-poverty-and-income-inequality-report-2021-22>

⁹ <https://www.health-ni.gov.uk/publications/health-survey-northern-ireland-first-results202122>

¹⁰ Ibid.

¹¹ <https://www.infrastructure-ni.gov.uk/sites/default/files/consultations/infrastructure/nicfc-draft-eqia.PDF>

Option 5 – “Free travel for those currently receiving a half fare concession due to a qualifying disability” as it would have a “**positive equality impact**” on the Equality categories relating to “Disability”.

Option 6 – The provision of “Companion passes for disabled people, unable to travel alone” as it would have a “**positive equality impact**” on the Equality categories relating to “Disability, Age, People with Dependents”.

Option 7 – The proposal to “Extend the qualifying criteria for a Half Fare SmartPass in line with other jurisdictions” as it relates to disability and would have a “**positive equality impact**” on the Equality categories relating to “Disability.”

Option 8 – offering “Free transport for destitute asylum seekers and victims of human trafficking” as it would have a “**positive equality impact**” on the Equality categories relating to “race.”

Option 9 – The suggested “Changes to the residence test” as it would have a “**positive equality impact**” on the Equality categories relating to “race” “age” and “disability.”

Option 10 – Extending the list of documentation that can be used for the purposes of “Proving residency” as it has a “**positive equality impact**” in relation to the Equality categories relating to “race” “age” and “disability.”

Conclusion

NIPSA believe that any review of policy, as it affects our older citizens should recognise their previous and ongoing service to society and be shaped by the question of how best this contribution can continue to be supported to the fullest extent in the future. This means their experience should be drawn upon – not ignored, undervalued or betrayed by the failure to fully honour promises made on age related social security support/“reward” such as that exemplified by the “concessionary fares” scheme. We urge the Department to: reflect on this point; study the impact of adverse impact on Equality of Opportunity from their own EQIA; recognise the popularity/success of the current arrangements; reject any proposals that decrease eligibility/social inclusion (Options 1-5) and fully develop those that do the opposite Options (5-10).