



**Community
Transport
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*Delivering social
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Louise Butcher
Inquiry Manager
Transport Committee
House of Commons
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LONDON
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Dear Ms Butcher,

Inquiry into Ticketing On Public Transport

In response to the Transport Committee's call for evidence into the above inquiry, the CTA would like to comment on two of the key questions raised by the Committee in its call for evidence, namely:

- Is the Government's concessionary fares strategy, including the proposed scheme for concessionary bus travel, adequate?
- Are concessionary fares schemes sufficiently integrated across different modes of transport and different geographical areas.

The CTA believes that the Government's current concessionary fares strategy is inadequate to address the needs of all eligible concessionary fares travellers. The strategy does not sufficiently address the needs of those eligible older and disabled travellers who cannot physically access mainstream bus services or who are so geographically remote from such bus services as to render the services useless. Such passengers are required to pay for transport on community and other services. Integrated ticketing solutions have the potential to create a further barrier to ending this discrimination if the needs of community transport operators are not considered in implementing such solutions.

The CTA is of the opinion that concessionary fares schemes are not sufficiently integrated across modes of transport and different geographical areas. Concessionary travel, including the extensions proposed in the Concessionary Bus Travel Bill currently going through Parliament, suffer from



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the inherent discrimination mentioned above. Local administering authorities have the discretion to reimburse community transport operators for the provision of concessionary travel, but in practice few choose to do so. There is, therefore, significant variation in the concessionary travel strategies of different administering authorities across the country. As the national extension comes into force under the Concessionary Bus Travel Bill in April 2008, this means that travellers will be subject to different policies in different areas. It is entirely likely in some cases that travellers will be subject to such variations in policy on different sections of the same journey. Again, this represents a barrier to the development of accessible and responsive concessionary travel schemes. It is, therefore imperative that integrated ticketing solutions are developed which can be easily and cost effectively implemented by small scale local community operators as well the large commercial operators. Such solutions and the extension of concessionary travel reimbursement to community transport operators would combine to have the added benefit of facilitating the establishment of local community run feeder services to link with inter-urban mainstream services.

It has been estimated that the cost of extending the concessionary travel provision to enable beneficiaries to use community transport across England is about £25m. This equates to an additional 4% on the government's overall budget for concessionary travel or less than the cost of a mile of motorway (£30m). The CTA believes this is a relatively small cost to end the current postcode lottery and ensure equal access to services for all eligible travellers.

I am including in our submission a copy of our policy statement on concessionary travel, which provides more background and detail to my comments above.

The CTA would be happy to provide oral evidence to the Transport Committee in support of this submission.

Yours sincerely,

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Policy Statement No.1 (2006)

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Community Transport and Concessionary Travel

Introduction

Thanks to government support, travellers have been able to make increasing use of concessionary fares in all parts of the UK in recent years – and this trend is set to continue. Most recently, announcements were made in the 2005 Budget that a concession scheme would be introduced in England allowing free bus travel for over-60s and people with disabilities. However, it is clear to those who use or operate accessible transport services that widely varying levels of public transport provision are available to travellers depending on where they live and whether they have any form of disability. This means that some people will not be able to make use of concessionary fares to which they are entitled because they cannot access a local bus service.

This paper sets out the position of the Community Transport Association on the key objectives of concessionary travel and describes how schemes all over the UK can better accommodate the needs of disabled people and other excluded travellers. The paper identifies the key stakeholder groups and proposes how the CTA's objectives could be achieved.

The CTA's position

The CTA believes that every member of the public is entitled to equality of access and that concessionary travel is an increasingly important mechanism that can be used in the pursuit of this aim. It is imperative that concessionary travel schemes do not discriminate against any of the intended beneficiaries, and the CTA believes that central government policy should explicitly reflect this. Concessionary travel scheme administrators must ensure that such a policy is implemented effectively and that every eligible passenger has access to the same level of service.

The CTA believes, therefore, that the following over-arching strategic aim should be adopted by government:

Any person unable to make use of their concession on existing eligible transport services as a result of disability, age or other limiting factor should be permitted to use it on other transport services, with the operators of those services being reimbursed by the administrators of the local concessionary travel scheme. All eligible passengers should

receive equal access to services. However, the provision of this fair level of service to currently excluded individuals must not adversely affect the level or quality of service enjoyed by existing passengers. This service provision should be adequately resourced by central government, whether the UK government or, if different, the appropriate level of government for Scotland, Wales and Northern Ireland.

Furthermore, the following specific objectives should be adopted as part of the drive to meet the above aim:

All public and community transport services should be entitled to reimbursement of the concessions they offer to passengers. Such provision should apply whether the service in question is available to the general public as a whole (as with scheduled commercial or section 22 services) or available to a specific sector of the public (as with section 19 Dial-a-Ride services in Great Britain or section 10B permit services in Northern Ireland).

► *Administrators of concessionary travel schemes, usually local authorities, have discretionary powers to reimburse operators of certain other types of service. The number and type of services automatically entitled to reimbursement should be widened to include all services that offer safe, legal transport and the discretion to discriminate should be removed.*

Concessionary travel scheme operators should be required to demonstrate that schemes are focused on user requirements and not on the administrative requirements of the scheme administrators.

Given that community transport services are non-commercial and already frequently operate at capacity, they are not in a position to benefit from the anticipated increase in passengers that improved concessionary fares will bring to commercial operators. The concessions allowed to passengers travelling with non-commercial operators should therefore be reimbursed in full.

As well as including the widest possible range of transport service providers in concessionary schemes, the cost of training some people (eg travellers with a learning disability) to use their concessionary entitlement should be covered by the scheme itself.

Increased flexibility of access to travel concessions should be permitted in order to allow groups of people to travel together on services that can offer such provision, if that provision can be achieved more efficiently than transporting the passengers individually.

Government should review the impact of changes to concessionary travel policy and delivery mechanisms in order to assess whether the above objectives are being met, to ensure that neither passengers nor operators are worse off as a result and to review the overall cost of implementation. This should be a UK-wide exercise which compares and contrasts the approaches taken in England, Scotland, Wales and Northern Ireland and their impacts.

Stakeholder interests

The effect of implementing policies to achieve the above objectives will have important ramifications for different groups of stakeholders. The key groups, and some of the issues they face, are:

Passenger transport users

People are entitled to equal access. Disability discrimination is not acceptable and it is possible that action under the Disability Discrimination Act or human rights legislation may result if equal access to services is denied.

Community transport providers

Operators should be 'no better or worse off' as a result of providing concessionary travel and being reimbursed for its provision. It is important that community transport operators recognise this and focus services on user need. They should not view concessionary travel as merely a mechanism to increase funding – it is not! However, community transport operators need to be aware of the legislation governing payment of administration costs – it has created a mechanism which they can use to help achieve their aim of providing access, mobility and choice to excluded groups and individuals. Operators must record both the level of demand

they are able to meet and that which they are unable to meet. They must also work with scheme administrators and policy makers to continually assess the levels of need.

Concessionary travel scheme administrators

Running concession schemes involves complex administrative procedures. Administrators, quite rightly, desire to operate as efficiently as possible, but schemes must not be designed primarily for ease of administration. There is great concentration on preventing fraud, but schemes' procedures to achieve this can render access to concessionary travel too complex for some disadvantaged passengers.

Central and local government

Lack of finance is not an acceptable excuse for discrimination. The cost of providing equal access for disabled and non-disabled travellers should be assessed and made available to scheme administrators to reimburse the widest possible range of operators.

The Community Transport Association

The CTA needs to inform members and community transport users and consult on their views. It will ►

Policy Statement No.1 (2006): **Community Transport and Concessionary Travel**

- ▶ engage with all stakeholders and focus discussion on achievement of the strategic objectives set out above. The CTA will seek to ensure that all stakeholders understand the wider objectives and do not concentrate solely on their own, sometimes more

narrow, objectives. The CTA must both represent the views and needs of its member organisations and provide leadership and support to those organisations in their work to provide access and mobility to excluded individuals.

Strategies for achieving objectives

The CTA recognises that there are a number of potential strategies that could be adopted to pursue the aim of equality of access, with differing potential impacts. The CTA will, therefore, focus on the following strategic directions:

Concessionary travel legislation

The CTA will make the views of its members known at every opportunity with a view to changing legislation to include the strategic objectives set out above. The CTA will respond to all consultations on this subject on behalf of its members and will encourage its members to respond individually. The CTA will lobby the UK and devolved governments directly for changes to regulations governing the implementation of concessionary travel schemes in order to allow access to schemes by a wider range of services and operators.

The operator licensing regime

The CTA will continue to lobby for changes to section 19 (section 10B in Northern Ireland) and section 22 legislation to enable those who do not have access to appropriate services, whether through physical inaccessibility or isolation, to have equality of service across the UK. In particular, it will press for the ability to pay drivers of minibuses run under section 22 community bus permits, and for the extension of section 19/10B small bus permits to include vehicles with fewer than nine passenger seats.

Anti-discrimination rules and promotion of social inclusion

The CTA will continue to promote social inclusion and combat discrimination. It will work with its members and other stakeholders to ensure that concessionary travel schemes offer a consistent level of service to all eligible travellers. It will, if necessary, work with others to take action through the courts in order to establish the illegality of unfair legislation.

The wider community benefits

The CTA will raise the issue of cross-sector benefits, emphasising that the provision of services by our members benefits the wider community by ensuring an integrated transport network that provides access for all. It will work with policy makers and funders of community transport to research and establish the wide-ranging benefits of community transport to all sections of society.

Community transport funding streams

The CTA will lobby for increased funding of community transport via local and central government funding streams which can in turn allow operators to offer free travel to eligible passengers, as is currently being piloted in Wales.

Conclusion

Transport is only a means to an end but it has a huge impact on almost everything we do. It has an even bigger impact on those who are socially excluded. The CTA aims to influence the actions and policies of local, regional and central government, and of those who fund or contract community transport services, to bring about an accessible and inclusive public transport network which does not discriminate against any person or group of people.

The CTA welcomes comments on this policy statement from all concessionary travel stakeholders. We recognise that significant discussion will be required to achieve many of the technical, regulatory and administrative changes to concessionary travel schemes that the CTA advocates, but we are committed to achieving our objectives, as set out in this statement, in an open and collaborative manner.