



TRANSPORT  
SCOTLAND  
CÒMHDHAIL ALBA

transport.gov.scot

# **Free Bus Travel for Older and Disabled People and Modern Apprentices**

## Analysis of Responses to the Consultation

August 2018

## CONTENTS

<b>Executive Summary .....</b>	i
<b>1. Introduction .....</b>	1
Background.....	1
Profile of respondents.....	1
Analysis and reporting .....	2
<b>2. Free bus travel for older and disabled people .....</b>	3
<b>3. Free bus travel for modern apprentices .....</b>	18
<b>4. Companion cards for disabled children under age 5.....</b>	25
<b>5. Other issues .....</b>	28
<b>6. Assessing impact .....</b>	38
Equality .....	38
Safety of Children and Young People.....	39
Business and Regulation .....	40
Privacy .....	43
<b>Annex 1: Group respondents .....</b>	44

## EXECUTIVE SUMMARY

The current Concessionary Travel Scheme for Older and Disabled People provides free bus travel within Scotland on any registered bus service to anyone who lives in Scotland, who is aged 60 and over or meets certain disability criteria, and who has applied for and received a National Entitlement Card (or “bus pass”).

The Scottish Government has committed to continuing to provide free bus travel for those who need it the most, and this consultation looked at options to ensure the longer-term sustainability of the Scheme. Also included were questions on a proposal to provide free bus travel to Modern Apprentices, and to provide free companion travel for eligible disabled children under five who are not currently covered by the Scheme.

The consultation was published on 25 August and closed on 17 November 2017. In total, 2,947 responses were submitted. A substantial majority of responses came from individual members of the public.

### **Free bus travel for older and disabled people**

The first consultation question asked whether age eligibility for the Scheme should remain as it is. Of those who answered this question, the majority, 64%, think that the existing age eligibility criteria for the Scheme should be retained, while 36% think that it should not.

A number of respondents reference any potential changes affecting those who have already seen their State Pension Age (SPA) raised. This point is often associated with reference to the effects of the change in SPA on women in particular, or is made by female respondents who have been affected.

Respondents also comment on the importance of the bus pass in counteracting isolation and loneliness, encouraging older people to get “out and about”, and promoting mobility and independence. They refer to associated benefits including sustaining both physical and mental health and allowing older people to act as carers or to give their time as volunteers. Other points raised include the value people place on their bus pass, the degree to which they depend upon it, or the extent to which they have looked forward to receiving it. Some respondents make points relating to the limited income of many people over the age of 60.

There are references to the role of the bus pass in encouraging use of public transport, taking cars off the road, reducing congestion or benefiting the environment. Others see a reduction in the number of concessionary passengers as potentially putting the future of less viable bus services at risk, with impacts on the wider bus network for all bus users. Some of these respondents draw particular attention to their fears for services in rural areas.

The second consultation question asked if respondents were in favour of raising age eligibility to female SPA in one step. A substantial majority of respondents who answered Question 2 (73%) do not agree.

The most frequently-made point, as at the first question, is that this proposal is unfair to people who have already experienced the greatest financial impact of increased

SPA. A number of respondents make reference to people being unable to work before reaching SPA, including noting that people who would not qualify as disabled could nevertheless be significantly limited in terms of their mobility.

In terms of the timing of any possible increase in age eligibility, the most frequently-made point is that any change to eligibility criteria should be more gradual, with a single jump to SPA too great or particularly unfair to those who just missed whatever cut-off date was chosen.

Some respondents, including those who agree and disagree that eligibility for the Scheme should remain as it is, disagree with the use of the bus pass by people who are still working. Other respondents highlight the need for equality in terms of receipt of the bus pass, sometimes also agreeing with the equalisation of pension ages.

The third consultation question asked if respondents were in favour of raising age eligibility to female SPA gradually over time, and at what rate. The consultation paper explained the effects of a gradual increase in the age of eligibility for the bus pass, moving towards SPA either at a rate of one year per year or by six months per year. Of respondents who answered this question, a small majority, 55%, do not agree with eligibility being raised to female SPA gradually over time. Of those who indicate a preference for the rate at which eligibility should be raised to female SPA, 56% opt for an increase at a rate of 6 months per year, while 44% opt for 1 year per year.

A number of respondents suggest that raising the age of eligibility gradually is a fairer approach, with some saying that it allows more time for people to plan for change or for expectations to be adjusted. Other comments include that a gradual change would be the preferred option if any change is necessary, although often this is accompanied by the opinion that there should be no change.

Comments in support of the faster rate of increase include that this provides a good compromise between a sudden rise and a very gradual increase and that it would be simple to explain and administer. Respondents who support a slower rate of increase typically feel that this is the fairest option, particularly for those approaching the age of 60. However, many respondents qualify their remarks by restating a preference for no increase at all.

### **Free bus travel for Modern Apprentices**

The fourth consultation question asked if respondents were in favour of providing free bus travel for Modern Apprentices and whether this should be targeted at those under age 21. It also asked if respondents felt there was a better way to provide support to help with the travel costs of Modern Apprentices.

Of those who responded, the majority, 68%, agree that free bus travel should be provided for Modern Apprentices. Respondents are evenly divided as to whether the proposed benefit should be targeted to Modern Apprentices under age 21.

Of those responding to the question about whether there were better ways to help with travel costs for Modern Apprentices, the majority, 57%, do not think there is a better way to provide support to help with this.

There are three main issues highlighted by those who agree with the initial proposal. The first of these is that Modern Apprentices are not well paid and either need or will very much benefit from free bus travel. The second issue is that no age limit should be applied, and all Modern Apprentices should be able to access free bus travel. It is suggested that it is not reasonable to treat some Modern Apprentices differently purely on the basis of their age. The third issue is that concessionary travel for Modern Apprentices should be extended to other modes of public transport, with trains being the most likely mode suggested.

The main issue raised primarily by those who disagree with Modern Apprentices receiving free bus travel is that Modern Apprentices have an income and should be expected to cover their costs in the same way that others do or did.

Other frequently-made comments made by both those who agree and those who disagree that Modern Apprentices should receive free bus travel include that Modern Apprentices should be paid better and/or receive the living wage, or that employers should cover the travel costs of Modern Apprentices. A common theme is that employers will be benefitting from having a Modern Apprentice and that it is therefore appropriate that they, rather than the tax payer, cover travel costs.

Other respondents suggest that a wider range of young people should be covered, with various suggestions including that: all young people; all working young people; and all in education (including school or further education) should be able to access concessionary travel.

Finally, a number of respondents make comments about whether there are better or alternative ways to provide support to help with the travel costs of Modern Apprentices. These suggestions are very diverse but the two most-frequently made are some form of discounted fare, or a grant or bursary to cover or subsidise travel costs.

### **Companion cards for disabled children under age 5**

The fifth consultation question asked if respondents were in favour of providing a companion card for disabled under 5s where this is needed. The consultation paper noted that children under 5 generally travel for free on the bus and that as a result access to a disabled bus pass starts at age 5. However, this means that the parents and carers of otherwise eligible disabled under 5s have to pay for their bus travel when, at age 5, the disabled child may qualify for a companion card or bus pass. The Scottish Government is proposing to fix this anomaly by providing disabled under 5s with access to a companion bus pass where this is needed.

A substantial majority of those who answered this question, 81%, are in favour. Those who agree often suggest the proposal is reasonable, sensible or fair.

There are two other frequently-made points by respondents who are in favour of the proposal. The first of these is that families with a child with a disability may face particular challenges, and some of those may incur additional costs. The other frequently-raised issue is that it is not logical to have two different arrangements for disabled children under and over 5 and that the Scottish Government is right to address this anomaly. A number of respondents note that they are surprised that

companion cards are not already available for disabled under 5s and/or suggest that standardising the treatment of the under and over 5s is the logical and right thing to do.

The most-frequently raised point by those who disagree is that the proposed approach would discriminate against the parent or carers of all other children under 5. Some people also make the point that any child under 5 will always need to be accompanied on the bus and feel that whether the child is disabled or not is irrelevant.

### **Other issues**

The consultation also invited respondents to make any other comments on any of the issues covered by the consultation.

A number of respondents make points on aspects of the consultation process, including that the process would have been improved by consulting on all potential options and by framing some of the questions differently.

Local Authority respondents in particular comment on potential outcomes for the bus industry and for bus services. It is suggested that a likely drop in passenger numbers and a reduction in payments to operators could cause services to be withdrawn and the bus network to shrink - an adverse outcome for all bus users and one that is contrary to the objective for the Scheme to improve public transport. Respondents feel this is particularly serious in rural areas or semi-urban areas where services are less profitable, and has the potential to put pressure on Local Authorities to provide alternative support for services.

The consultation paper explained that the Scottish Government had also considered four other ways that the Scheme might be changed to make it more sustainable, but that it was not minded to adopt any of these. A number of respondents suggest that they consider at least one of these to be a good idea or worthy of further consideration. Respondents are more likely to support requiring card holders to make a small financial contribution towards the cost of each concessionary journey or levying an annual charge for access to free bus travel. They are less likely to support restricting use of a bus pass during peak travel times or having a cap on the value of individual journeys which can be free.

Other suggestions on how the long-term sustainability of concessionary travel could be achieved include restricting passes to local travel or providing discounted rather than free travel for long distance journeys or for travel out with the local area.

### **Assessing Impact**

The final section of the consultation asked four questions about the possible impact of the various proposals.

#### Equality

On any likely impact of the proposals on particular groups of people, the most-frequently made points are that none are likely or that there would be an age-related impact. While some suggest that the proposals would discriminate based on age (and older age in particular), others suggest that there would be an impact but that

measures which ensure that older men and older women are treated equally would be fair. Other age-related comments focus on the impact on younger people and, in particular, their travel-related needs.

### Safety of Children and Young People

The large majority of respondents suggest they do not expect the proposals to have any additional impact on the safety of children and young people.

### Business and Regulation

On whether the proposals are likely to increase or reduce the costs and burdens placed on any sector, around the same number of respondents that think costs will be reduced, also think they will increase. However, a number of those who suggest costs will increase think that any additional costs represent a worthwhile use of public funds.

Some respondents identify sectors or types of organisation which they think will be affected negatively by changes to eligibility criteria for the older person's bus pass. The four most frequently-identified sectors are: the voluntary or third sector; public services and particularly the NHS or social care services; businesses, and local businesses in smaller or rural communities in particular; and bus operators and the wider transport system.

### Privacy

The final question asked respondents about whether the proposals could impact on people's privacy. A substantial majority of respondents who commented said they do not think the proposals will have an impact on the privacy of individuals.

## 1. INTRODUCTION

### Background

- 1.1 The current Concessionary Travel Scheme for Older and Disabled People (“the Scheme”) provides free bus travel within Scotland on any registered bus service to anyone who lives in Scotland, who is aged 60 and over or meets certain disability criteria, and who has applied for and received a National Entitlement Card (or “bus pass”). In addition, residents of Orkney, Shetland and the Western Isles who meet these criteria are entitled to two free return ferry journeys to the mainland each year. The Scottish Government has committed to continuing to provide free bus travel for those who need it the most, and is consulting on options to ensure the longer-term sustainability of the Scheme. Also included in the consultation are questions on a proposal to provide free bus travel to Modern Apprentices, and to provide free companion travel for eligible disabled children under five who are not currently covered by the Scheme.
- 1.2 In his foreword to the consultation paper, the Minister for Transport and the Islands made clear both that anyone who already has a bus pass, or obtains one before any changes are made, will not lose it, and that there will not be any adverse changes to the existing eligibility criteria for those with a disability.
- 1.3 The consultation was published on 25 August and closed on 17 November 2017. The consultation paper is available at:  
<https://consult.gov.scot/partnerships-and-concessionary-travel/national-concessionary-travel-scheme/>.

### Profile of respondents

- 1.4 In total, 2,947 responses were submitted. The majority of these were received through the Scottish Government’s online consultation hub, Citizen Space, with a small number submitted by email or in hardcopy. A profile of respondents by type is set out in Table 1 below. Organisational respondents have been placed into one of eleven respondent types by the analysis team. A list of all organisation respondents, along with the respondent type assigned, is attached to this report as Annex 1.
- 1.5 A substantial majority of responses (around 96%) came from individual members of the public and the report reflects this. Throughout the report, quotes from responses used to illustrate the points made are, unless specified otherwise, taken from the comments made by individual respondents.

**Table 1: Respondents by type**

Type of respondent	Number
<b>Groups:</b>	
Bus Operator	7
Community Council or Residents' Group	11
Community Transport Group or Association	7
Local Authority	21
Other	7
Professional or Representative Body	5
Third Sector or Membership Organisation	35
Training or Employability Organisation	9
Regional Transport Partnership	8
Union or Political Group	8
<b>Total Groups</b>	<b>118</b>
<b>Individuals</b>	<b>2829</b>
<b>TOTAL</b>	<b>2947</b>

### Analysis and reporting

- 1.6 The remainder of this report presents a question-by-question analysis of the responses. A small number of respondents did not make their submission on the consultation questionnaire, but submitted their comments in a statement-style format. Where these responses contained a clear answer to one of the Yes/No questions this has been recorded. Where there was no clear answer, the response has been counted as “Not answered”, and the remaining content analysed qualitatively under the most directly relevant question.
- 1.7 Given the level of response, this report presents a summary analysis which focuses primarily on the key themes raised but also considers the range of, and differences in, views expressed.
- 1.8 Although the number of comments made at each question was often high, many respondents reiterated similar points at a number of questions, particularly with reference to the older person’s bus pass. For example, points made at Question 1 in support of retaining the existing eligibility criteria were often reiterated at Questions 2 and 3 as reasons for opposing any potential changes. The analysis presented in this report seeks to avoid repetition where possible particularly across Questions 1 - 3 and at Question 6, which asked respondents about any other issues they wished to raise. If a frequently-raised issue has appeared at a number of questions, the main analysis will be included under the question at which it was raised the most.

## 2. FREE BUS TRAVEL FOR OLDER AND DISABLED PEOPLE

- 2.1 At present everyone resident in Scotland can get a bus pass on their 60<sup>th</sup> 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. At Question 1 the consultation paper sought views on whether age eligibility for the Scheme should remain as it is.

**Question 1: Do you think that we should retain the existing age eligibility criteria for the Scheme?**

- 2.2 Responses by respondent type are set out in Table 2 below.

**Table 2: Question 1: Do you think that we should retain the existing age eligibility criteria for the Scheme? – Responses by respondent type**

Type of respondent	Yes	No	Not answered	Total
<b>Groups:</b>				
Bus Operator	1	4	2	7
Community Council or Residents' Group	5	6		11
Community Transport Group or Association	2	4	1	7
Local Authority	7	11	3	21
Other	3	2	2	7
Professional or Representative Body	1	3	1	5
Third Sector or Membership Organisation	11	11	13	35
Training or Employability Organisation	2	1	6	9
Regional Transport Partnership	5	3		8
Union or Political Group	5	1	2	8
<b>Total Groups</b>	<b>42</b>	<b>46</b>	<b>30</b>	<b>118</b>
<b>% of groups answering</b>	<b>48%</b>	<b>52%</b>		
<b>Individuals</b>	<b>1802</b>	<b>971</b>	<b>56</b>	<b>2829</b>
<b>% of individuals answering</b>	<b>65%</b>	<b>35%</b>		
<b>All respondents</b>	<b>1844</b>	<b>1017</b>	<b>86</b>	<b>2947</b>
<b>% of all respondents</b>	<b>63%</b>	<b>35%</b>	<b>3%*</b>	
<b>% of all those answering</b>	<b>64%</b>	<b>36%</b>		

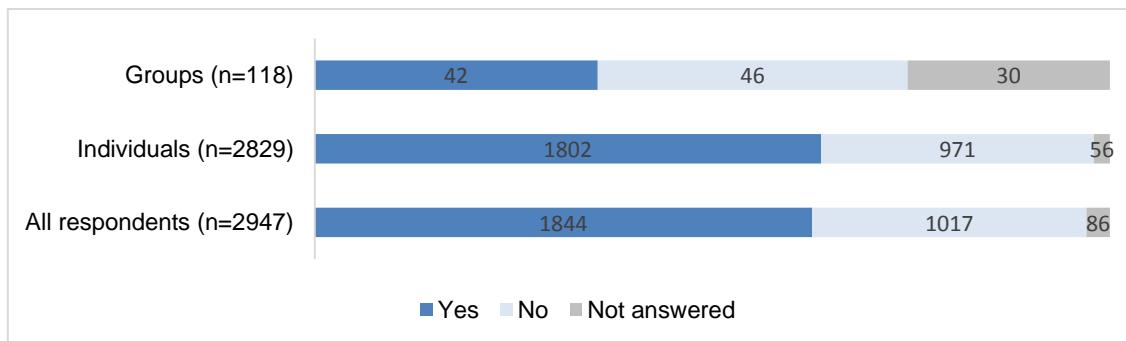
\* Figures do not sum to 100% due to rounding

- 2.3 The majority of respondents who answered Question 1 (64%) think that the existing age eligibility criteria for the Scheme should be retained, while 36% think it should not. Amongst organisational respondents, however, a small

majority of those answering (52%) think the existing criteria should change while 48% feel it should stay as at present.

- 2.4 Chart 1 below illustrates the difference in views between organisational respondents, individual respondents, and all respondents.

**Chart 1: Question 1: Responses by proportion of respondent type**



- 2.5 A total of 1,881 respondents provided a comment at Question 1, the majority of these being made by respondents who think that the existing eligibility criteria should be retained. Amongst respondents who answered that the criteria should not be retained, less than a third made any further comment at this question.
- 2.6 Both at Question 1 and elsewhere in their response, some respondents may have made comments on the prospect of withdrawal of the bus pass rather than a change to the age at which it is awarded. Likewise, a number of respondents who identify themselves as holders of a disabled person's bus pass express concern that this might be taken away. Neither of these scenarios is raised as a possibility in the consultation paper.

**Points raised mainly by respondents who think that the existing eligibility criteria for the Scheme should be retained**

- 2.7 Either at Question 1 or elsewhere, around 1 in 3 respondents make reference to any potential changes affecting those who have already seen their State Pension Age (SPA) raised.
- 2.8 Respondents sometimes describe being angry or upset by the prospect of any changes to the existing eligibility criteria, or argue that it is unfair that the same group should be impacted again. This point is often associated with the effects of the change in SPA on women in particular, or is made by respondents who identify themselves as being women who have been affected.
- 2.9 In a number of related points, a smaller number of respondents:
- Express a view that by working and contributing to the economy for many years they have "earned" their bus pass, sometimes adding that this is now the only benefit to which they are entitled.
  - Comment that the free bus pass helps to offset the consequences of loss of pension income, or that its removal will add further to the financial burden they face.

2.10 For example, one respondent comments:

*"After working full time for over 40 years I think this is earned. Women about to turn 60 have already had their pension eligibility put back 6 years - please do not add to the financial burden by removing the entitlement to concessionary travel at 60."*

2.11 Around 1 in 5 respondents comment on the importance of the bus pass in counteracting isolation and loneliness, encouraging older people to get "out and about", and promoting mobility and independence. As one respondent notes:

*"It prevents isolation for people, supports people living in rural areas to keep doing so for longer. It's an amazing social service and we should keep it!"*

2.12 Several associated benefits of getting out and about are also identified including:

- Sustaining both physical and mental health and the potential for reduced demand on the NHS or other services if people stay healthier for longer. One respondent argues:

*"These benefits - preventative medicine, if you will, freedom from isolation and improved mental health - are due to everyone achieving age 60."*

- Allowing older people to act as carers, to look after grandchildren, or to give their time as volunteers.
- Generating local economic activity or, conversely, that if people stay at home they will not spend any money. For example:

*"I imagine it also spreads economic benefits - that bus journey taken from Edinburgh to Peebles will always result in a cup of tea and a scone and a bit of shopping in local shops."*

2.13 One Local Authority respondent notes that a reduced number of visits to areas reliant on tourism could have a significant impact on the local economy. Wider economic issues concerning the functioning of the bus industry and the levels of return on investment generated by the Scheme are discussed further below.

2.14 Many respondents comment on the value they place on their bus pass, the degree to which they depend upon it, or the extent to which they have looked forward to receiving it. Terms such as "lifeline" recur in these responses.

2.15 In a similar vein, some respondents think that 60 remains the right age at which to get a bus pass. Respondents note that life expectancy in Scotland is not as high as elsewhere in the UK, or that many people begin to experience ill health at around this age:

*"I think the current eligibility age is correct. Many people can start to experience either poor health or mobility issues before reaching 60. Raising the age to 66 would have a hugely detrimental effect on those people."*

- 2.16 Many respondents make points relating to the limited income of many people over the age of 60. It is suggested that some will retire completely or reduce their working hours before reaching SPA, living on reduced income, savings or an occupational pension in the interim. The reasons given for making such a decision include feeling unable to continue working for health reasons, being unable to find work, or the need to care for older family members. Others, it is suggested, may still be working full-time but be in poorly paid employment and hence are still in need of a bus pass. Some respondents refer specifically to the importance of a bus pass to those older people on the lowest incomes as well as other vulnerable members of society.
- 2.17 Respondents also comment on the role of the bus pass in encouraging use of public transport, taking cars off the road, reducing congestion or benefiting the environment. Conversely, a number of respondents suggest that restricting eligibility may cause traffic levels to increase. A Local Authority respondent notes:
- "It is difficult to overestimate the importance of the concessionary travel scheme's role in the wider transport system in [the local authority area] and the knock-on effects of changes to eligibility. If the scheme were to change, the resulting increase in levels of car use would greatly add to levels of traffic and congestion and would endanger the success and viability of other initiatives."*
- 2.18 A smaller group of respondents suggest that they have little choice but to use public transport because they do not own or cannot afford to run a car, or because they are no longer able to drive.
- 2.19 Others see a reduction in the number of concessionary passengers as potentially putting the future of less viable bus services at risk, with impacts on the wider bus network for all bus users. Some of these respondents draw particular attention to their fears for services in rural areas:
- "Reduction in usage of public transport in rural communities caused by reduced usage of older people would mean a probable loss of services, thereby isolating older people where public transport is their lifeline."*
- 2.20 There is specific reference to issues associated with living in a rural area, including the high risk of isolation, low frequency of services, and high cost of some fares. Issues surrounding the availability and accessibility of bus services in rural areas are discussed further at Question 6.
- 2.21 Respondents also make a range of points broadly concerning the political process including, most frequently, that a change to the current age-related eligibility was not in the Scottish National Party's manifesto at the last election, and that the Scottish Government therefore has no mandate for such action. Some of these respondents suggest that the decision made might affect their future voting intentions.

2.22 Smaller numbers of respondents comment on:

- The high cost of bus fares.
- The use of the bus pass for long distance travel – both as a much-valued aspect of the scheme, and as an area that should be curtailed for cost reasons and/or because the longer journeys being made may be purely for pleasure.
- Groups, such as those with substance misuse problems, from whom they believe bus passes should be withdrawn or perceived abuses of the Scheme they think should be stopped.
- The lack of information presented in the consultation paper.

2.23 Amongst specific points raised by those who feel there is a lack of information it is suggested that the consultation paper does not provide sufficient information to support the assertion that the Scheme is not sustainable in its current form, and no costs for retaining existing eligibility criteria are presented. Specifically, it is suggested that while the increasing number of people becoming eligible each year is cited, no account is taken of the number of individuals who cease to use their pass, and the number of concessionary journeys made each year has actually showed little change. It is also suggested that some users may obtain a pass but seldom if ever use it.

2.24 Additionally, it is noted that an assessment of the wider environmental, health, social care and economic impacts has not been included, and it is suggested that the changes envisaged may compromise the policy objectives for the Scheme as a whole. Reduced costs to the concessionary transport budget resulting in greater increased costs elsewhere is suggested, including to Local Authorities. A number of respondents cite a benefit/cost ratio for concessionary travel produced by Greener Journeys, or suggest that further analysis of the wider impacts is required before making any changes to the Scheme.

**Points made predominantly by respondents who think that the existing eligibility criteria should not be retained**

2.25 Amongst respondents who feel that existing eligibility criteria should be changed, the most frequently-made comment is that eligibility should be brought in line with SPA. A smaller number also suggest that the eligibility age should increase, but either do not specify to what this should be, or cite an alternative age, most frequently 65.

2.26 Smaller numbers of respondents specifically agree that the current Scheme needs to change to ensure financial sustainability.

**Points made by respondents irrespective of their answer to the Yes/No question**

2.27 A number of respondents comment on people using their bus pass to travel to work. In some cases, respondents simply state that those still in employment can afford to pay their own travel costs. Others suggest that the pass should only be available to those who have actually retired from work, even if they have achieved SPA. Within this group, additional caveats are suggested such as that

passes should not be available to those in full-time work, working over a certain number of hours per week, or to those in work paying over a certain salary.

2.28 A smaller number of respondents:

- Specifically suggest that some form of means testing would be appropriate, or that criteria other than age alone should determine eligibility.
- Propose that the age for eligibility should be lowered or that the Scheme should be extended to other groups of people, including young people, the unemployed and/or those in receipt of welfare benefits.
- Argue that any changes to eligibility must be made gradually or should be postponed.

2.29 Finally at Question 1, some respondents make alternative suggestions for saving money including, in some cases, measures equivalent to the options not currently favoured by the Scottish Government, and as set out in Annex C to the consultation paper. These are discussed at Question 6, as are issues associated with the reimbursement of bus operators and suggestions for extension of the Concessionary Travel Scheme to include other modes of transport.

2.30 Moving on to questions about how any change in eligibility should be implemented, the consultation paper noted that women's SPA is being equalised with men's, so that women will reach SPA at 65 from November 2018. In addition, both men's and women's SPA is due to increase to 66 by 2020 and to 67 between 2026 and 2028. In terms of the bus pass, two potential options for change were set out:

- To set the age of eligibility for free bus travel at female SPA from 2018 (Question 2); or
- To raise the age of eligibility to female SPA gradually over a period of time (Question 3).

2.31 The consultation paper specifically asked that respondents who thought that the eligibility criteria should remain unchanged should still provide answers to Questions 2 and 3 and more than 95% of these respondents did so.

**Question 2: Are you in favour of raising age eligibility to female State Pension age in one step?**

2.32 The consultation paper explained the Scottish Government's expectation that by raising the age of eligibility for the bus pass and so reducing the number of card holders, fewer concessionary journeys will be made and so the cost of the Scheme will be reduced. If eligibility is raised straight to female SPA from April 2018, it is estimated that by 2022-23 there would be around 350,000 fewer people eligible compared to the number if the current age of 60 was to be

maintained. In 2026-27, this would increase to around 520,000 fewer people as SPA rises to 66 then 67.

- 2.33 It is estimated that raising eligibility to female SPA from April 2018 would reduce costs by around £10 million in the first year, rising to around £65 million by 2022-23, £83 million in 2023-24, and £111 million in 2026-27. If this approach was adopted, someone who is 59 in 2017 would become eligible for their bus pass in 2024 when they reach the SPA.
- 2.34 Respondents were asked whether they were in favour of increasing eligibility in this way. Responses by respondent type are set out in Table 3 below.

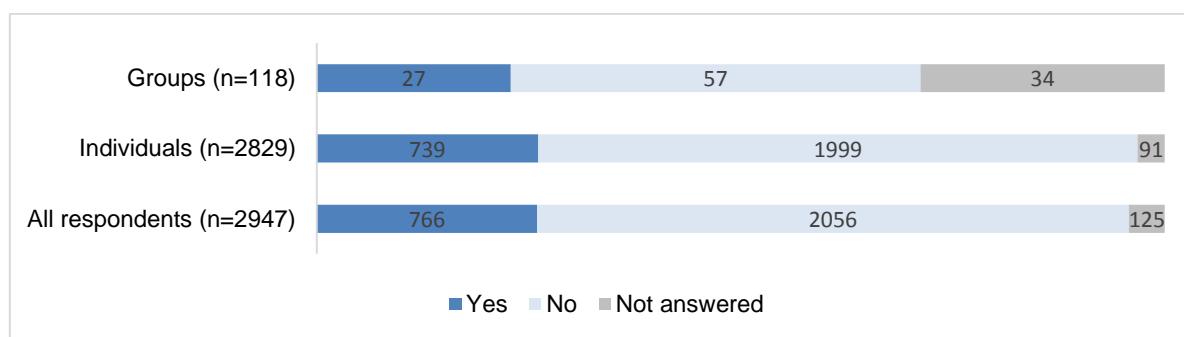
**Table 3: Question 2: Are you in favour of raising age eligibility to female State Pension age in one step? – Responses by respondent type**

Type of respondent	Yes	No	Not answered	Total
<b>Groups:</b>				
Bus Operator	3	2	2	7
Community Council or Residents' Group	6	5		11
Community Transport Group or Association	4	2	1	7
Local Authority	3	16	2	21
Other		5	2	7
Professional or Representative Body	1	2	2	5
Third Sector or Membership Organisation	8	13	14	35
Training or Employability Organisation	1	2	6	9
Regional Transport Partnership	1	7		8
Union or Political Group		3	5	8
<b>Total Groups</b>	<b>27</b>	<b>57</b>	<b>34</b>	<b>118</b>
<b>% of groups answering</b>	<b>32%</b>	<b>68%</b>		
<b>Individuals</b>	<b>739</b>	<b>1999</b>	<b>91</b>	<b>2829</b>
<b>% of individuals answering</b>	<b>27%</b>	<b>73%</b>		
<b>All respondents</b>	<b>766</b>	<b>2056</b>	<b>125</b>	<b>2947</b>
<b>% of all respondents</b>	<b>26%</b>	<b>70%</b>	<b>4%</b>	
<b>% of all those answering</b>	<b>27%</b>	<b>73%</b>		

2.35 A substantial majority of respondents who answered Question 2 (73%) do not agree with eligibility being raised to female SPA in one step, while 27% agree. The majority of both Individual and Organisational respondents are opposed to raising eligibility in one step (73% and 68% respectively). A large majority of Regional Transport Partnership respondents oppose a rise directly to female SPA, as do Local Authority respondents.

2.36 Chart 2 below illustrates the difference in views between organisational respondents, individual respondents, and all respondents.

**Chart 2: Question 2: Responses by proportion of respondent type**



2.37 In total, 2,276 respondents provide an explanation of their answer, although a small number make statements that refer exclusively to the increase in SPA and make no direct mention of the bus pass.

**Points made predominantly by respondents who are not in favour of raising age eligibility to female SPA in one step**

2.38 Amongst other respondents, the most frequently-made point, as at Question 1, is that this proposal is unfair to people who have already experienced the greatest financial impact of increased SPA. Around 1 in 4 respondents make such a point, with many making specific reference to women. Respondents also make reference to people actually retiring, or being unable to work before reaching SPA. Respondents raising this issue sometimes note that people who would not qualify as disabled can nevertheless be significantly limited in terms of their mobility.

2.39 In terms of comments specifically on the timing of any possible increase in age eligibility, the most frequently-made point is that any change to eligibility criteria should be more gradual, with a single jump to SPA too great or particularly unfair to those who just missed whatever cut-off date was chosen. A smaller number of respondents also argue that the Scottish Government should wait longer before making any changes since very little warning has been given. One respondent observes:

*"Increasing the age from 60 to 65 ... would make a dramatic change in eligibility at relatively short notice (less than a year) and at a time when at least some will have made arrangements on the basis that there would be no change to the existing age eligibility criteria."*

**Points made predominantly by respondents who are in favour of raising age eligibility to female SPA in one step.**

2.40 A number of respondents do not agree with the use of the bus pass by people who are still working, sometimes suggesting that as people are working longer they can afford to pay for their own travel. For example:

*"It makes sense to align eligibility for state pension with eligibility for a bus pass. I know several over 60s who are still working in reasonably well paid jobs who travel to work for free."*

2.41 Other respondents reference the need for equality in terms of receipt of the bus pass, sometimes noting their agreement with the equalisation of pension ages.<sup>1</sup> Some agree that the eligibility for the bus pass and the State Pension should be brought into line. A smaller number suggest that this seems sensible, fair, easy to understand, easy to administer, or specifically agree that the existing provision is unsustainable in its present form. For example, one respondent suggests:

*"One increase is surely more cost effective in relation to admin and informing the public and ultimately less confusing. A 'ripping off the plaster quickly' approach."*

2.42 A small number of respondents comment on what they perceive as the unfairness of the present arrangements to other members of the population, including that many pensioners are relatively well off, or that allowing older passengers to travel to work for free is unfair to younger people who may be earning much lower wages but have to pay their own bus fares.

### Points made by those who agree and those who disagree

2.43 A number of points are made by respondents who agree with raising eligibility straight to female SPA and those who do not, albeit in small numbers:

- That the age of eligibility for the bus pass should rise, but specifically to 65. For respondents who did not agree with raising the age of eligibility at Question 2, this is likely to be the central reason for their answer, sometimes associated with a view that SPA should not rise above 65. For those who did agree, it is as a qualification for their approval. For example:

*"Though I would agree 65 years of age would be preferable, but then keep it so - do not do the increase to 67."*

- That the bus pass should be available when someone has actually retired, rather than at SPA per se:

*"Whilst I would like it to remain at 60 I understand the need to change it. I think it should go in line with when you retire from work not when you reach state pension."*

### Question 3

- a. Are you in favour of raising age eligibility to female State Pension age gradually over time?
- b. At what rate should age eligibility be raised?

2.44 At Question 3, the consultation paper explained the effects of a gradual increase in the age of eligibility for the bus pass, moving towards SPA either at a rate of one year per year or by six months per year. In both cases, people

<sup>1</sup> This response presumably reflects the reference to female SPA in the Question. In practice, both sexes receive their bus pass at the same age and there is nothing in the consultation paper to suggest that this will change.

who are currently in their late 50s would have to wait longer for their bus pass, but not until they receive their State Pension. It is estimated that raising age eligibility from April 2018 by one year per year would reduce costs by around £11 million in the first full year, increasing to around £40 million by 2022-23, while an increase of 6 months per year would reduce costs by around £5 million in the first full year, increasing to around £27 million by 2022-23.

2.45 At Question 3a respondents were asked whether they favoured a gradual increase in the age of eligibility and then at Question 3b whether they favoured the faster or the slower rate of increase. Responses by respondent type are set out in Tables 4 and 5 below.

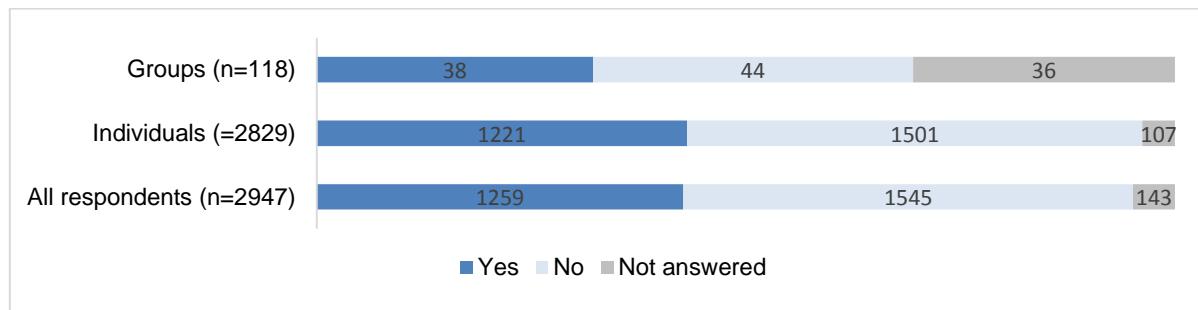
**Table 4: Question 3a: Are you in favour of raising age eligibility to female State Pension age gradually over time? – Responses by respondent type**

Type of respondent	Yes	No	Not answered	Total
<b>Groups:</b>				
Bus Operator	1	4	2	7
Community Council or Residents' Group	5	6		11
Community Transport Group or Association	3	3	1	7
Local Authority	11	7	3	21
Other	3	2	2	7
Professional or Representative Body	2	1	2	5
Third Sector or Membership Organisation	8	12	15	35
Training or Employability Organisation	2	1	6	9
Regional Transport Partnership	3	5		8
Union or Political Group		3	5	8
<b>Total Groups</b>	<b>38</b>	<b>44</b>	<b>36</b>	<b>118</b>
<b>% of groups answering</b>	<b>46%</b>	<b>54%</b>		
<b>Individuals</b>	<b>1221</b>	<b>1501</b>	<b>107</b>	<b>2829</b>
<b>% of individuals answering</b>	<b>45%</b>	<b>55%</b>		
<b>All respondents</b>	<b>1259</b>	<b>1545</b>	<b>143</b>	<b>2947</b>
<b>% of all respondents</b>	<b>43%</b>	<b>52%</b>	<b>5%</b>	
<b>% of all those answering</b>	<b>45%</b>	<b>55%</b>		

2.46 A small majority of respondents who answered Question 3a (55%) do not agree with eligibility being raised to female SPA gradually over time, while 45% do agree. Amongst those answering the question, the figures for Individual and Organisational respondents are very similar.

2.47 Chart 3 below illustrates the difference in views between organisational respondents, individual respondents, and all respondents.

**Chart 3: Question 3a: Responses by proportion of respondent type**



**Table 5: Question 3b: At what rate should age eligibility be raised? – Responses by respondent type**

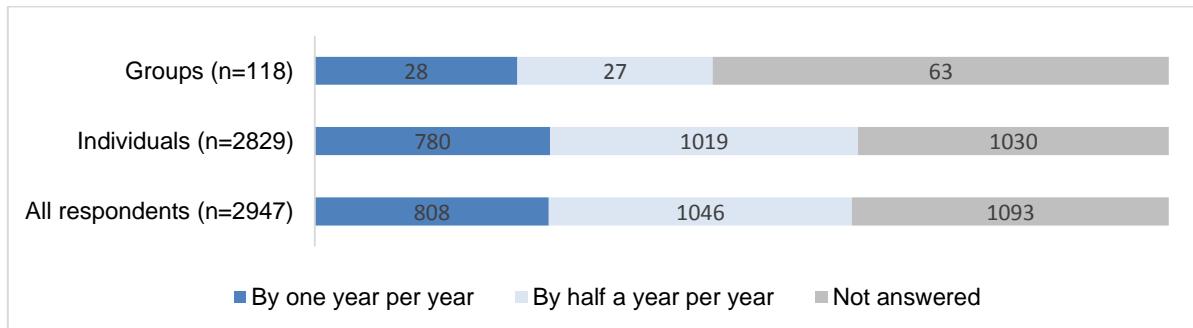
Type of respondent	By one year per year	By half a year per year	Not answered	Total
<b>Groups:</b>				
Bus Operator	2		5	7
Community Council or Residents' Group	2	3	6	11
Community Transport Group or Association	3	1	3	7
Local Authority	6	9	6	21
Other	1	2	4	7
Professional or Representative Body	3		2	5
Third Sector or Membership Organisation	7	6	22	35
Training or Employability Organisation	1	2	6	9
Regional Transport Partnership	3	3	2	8
Union or Political Group		1	7	8
<b>Total Groups</b>	<b>28</b>	<b>27</b>	<b>63</b>	<b>118</b>
<b>% of groups answering</b>	<b>51%</b>	<b>49%</b>		
<b>Individuals</b>	<b>780</b>	<b>1019</b>	<b>1030</b>	<b>2829</b>
<b>% of individuals answering</b>	<b>43%</b>	<b>57%</b>		
<b>All respondents</b>	<b>808</b>	<b>1046</b>	<b>1093</b>	<b>2947</b>
<b>% of all respondents</b>	<b>27%</b>	<b>35%</b>	<b>37%*</b>	
<b>% of all those answering</b>	<b>44%</b>	<b>56%</b>		

\* Figures do not sum to 100% due to rounding

2.48 Of respondents who answered Question 3b, 56% opt for an increase at a rate of 6 months per year, while 44% opt for 1 year per year. Organisational respondents are evenly balanced at 49% and 51% respectively.

2.49 Chart 4 below illustrates the difference in views between organisational respondents, individual respondents, and all respondents.

**Chart 4: Question 3b: Responses by proportion of respondent type**



2.50 A key point to note about Question 3b is the proportion of all respondents - 37% - who chose not to answer this question. As noted previously, the consultation paper specifically asked that respondents who thought that the eligibility criteria should remain unchanged should still provide answers to Questions 2 and 3. At Question 3b a small number of respondents specifically criticise the design of the question – including that there is no “Neither” choice available, and it is probable that the level to which this question was left unanswered reflects this issue. It is also the case that some respondents in favour of a move directly to female SPA did not respond at Question 3b. A small number of respondents who did answer indicated that they were *required* to make a choice, and had therefore selected an option that they did not want.

2.51 In all a total of 2,177 respondents made a comment at Question 3. Since some respondents left their comments entirely at 3a, some entirely at 3b and some at both, these have been grouped together for analysis. The comment box at Question 3a also invited suggestions as to how long-term sustainability of concessionary travel could be achieved or the Scheme improved, and many respondents suggested alternative restrictions that might be placed on the use of the bus pass. A smaller number made alternative suggestions for raising or saving money elsewhere in order to fund the Scheme. These ideas are summarised at Question 6.

#### **Points made predominantly by respondents who oppose raising age eligibility to female SPA gradually over time**

2.52 Many of the issues raised at Question 3 reflect views expressed at previous questions, most frequently that there should be no change to the existing age criteria, or to reference those who already have to wait longer to receive their State Pension.

2.53 Smaller numbers of respondents repeat the view that eligibility should rise to pension age (or their preferred age of 65), arguing that this will be better done in one go and that a gradual rise will be too complicated – being both harder to understand and more expensive to administer. For example:

*“I personally would find this very confusing - it was designed as a benefit for pensioners and would be easiest administered (and I would suggest understood) to still be in line with state pension age.”*

2.54 The point about possible confusion is suggested as having the potential to work in both directions – both causing disappointment to those who think they are eligible but are not, but also deterring some from applying because they do not realise that they are eligible.

#### **Points made predominantly by respondents who agree with raising age eligibility to female SPA gradually over time**

2.55 Around 1 in 5 respondents suggest that raising the age of eligibility gradually is a fairer approach, with some commenting that it allows people more time to plan for change or for expectations to be adjusted.

2.56 A small number of respondents point specifically to the importance of a phased transition in order to ensure that the bus industry is not destabilised. As one Other respondent notes:

*“By smoothing out the transition over a period of several years, this potentially allows operators and local authorities to engage in better long-term planning for a transition to the new status quo.”*

#### **Points made by those who agree and those who disagree**

2.57 Several points are made by respondents irrespective of their answer to the Yes/No question. These include:

- That a gradual change would be the preferred option if any change is necessary, although often with the added view that there should be no change. This view - typically that this is the “least bad” of the two options presented - is best represented by one respondent who says:

*“... I am against raising the age eligibility criteria at all but if a decision was taken to do this, then it should be done gradually over a period of time in order to provide those closest to the age of 60 with a fair and reasonable notice/transition period.”*
- That the start of any change should be delayed, or that it should be phased differently (either over a longer period, or using increments of different lengths). Most respondents propose slower implementation, although a small number think that the rate of change should be faster than 1 year per year.

## At what rate should age eligibility be raised?

2.58 As noted above, 44% of those who answered Question 3b opt for an increase at a rate of 1 year per year, while 56% prefer 6 months per year.

### 1 year per year

2.59 Comments in support of the faster rate of increase include that this:

- Provides a good compromise between a sudden rise and a very gradual increase.
- Reduces costs over a reasonable time-frame.
- Is simple to explain and straightforward to administer.
- Is the way most incremental schemes are managed.

2.60 One respondent also notes that a similar approach had been adopted successfully by Orkney Islands Council in respect of their own local concessionary scheme.

### 6 months per year

2.61 Respondents who support a slower rate of increase typically feel that this is the fairest option, particularly for those approaching the age of 60. However, many respondents qualify their remarks by restating a preference for no increase at all. One respondent states:

*"My preferred option is retaining current age eligibility. Failing that, if age eligibility is to be raised over time I support the rate of change being by half a year per year because that approach would 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."*

2.62 However, a small number of respondents suggest that 6 months per year would:

- Take unnecessarily long to achieve savings.
- Be difficult to understand.
- Be difficult to administer.

### **3. FREE BUS TRAVEL FOR MODERN APPRENTICES**

- 3.1 The Scottish Government is proposing to provide free bus travel for young Modern Apprentices and that this might be targeted at those under age 21. The Scottish Government's view is that introduction of free bus travel will make Modern Apprenticeships more accessible for all young people and will make the Modern Apprenticeship route more attractive to young people and potentially to employers.

**Question 4**

- a. Are you in favour of providing free bus travel to Modern Apprentices?**
- b. Should this be targeted at Modern Apprentices under Age 21?**
- c. Is there a better way to provide support to help with the travel costs of Modern Apprentices?**

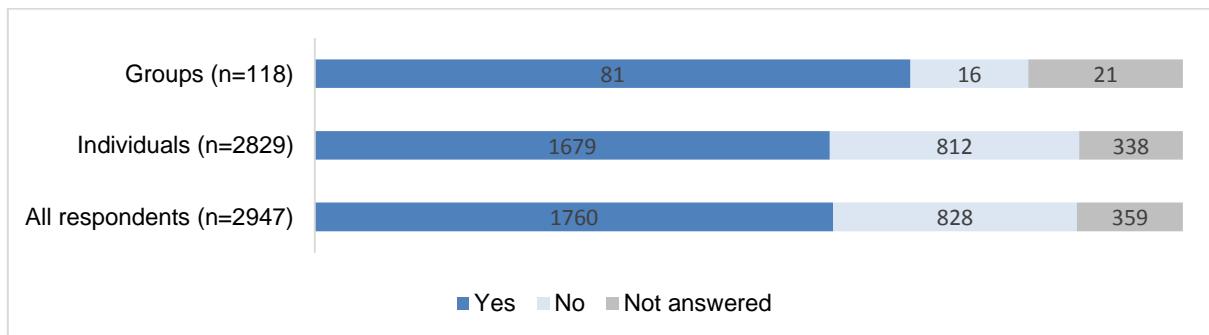
- 3.2 Responses by respondent type at each of the three sub-questions asked are set out in the Tables 6 - 8 below.

**Table 6: Question 4a: Are you in favour of providing free bus travel to Modern Apprentices? – Responses by respondent type**

Type of respondent	Yes	No	Not answered	Total
<b>Groups:</b>				
Bus Operator	1	4	2	7
Community Council or Residents' Group	9	2		11
Community Transport Group or Association	5	2		7
Local Authority	15	4	2	21
Other	4		3	7
Professional or Representative Body	4		1	5
Third Sector or Membership Organisation	21	3	11	35
Training or Employability Organisation	9			9
Regional Transport Partnership	8			8
Union or Political Group	5	1	2	8
<b>Total Groups</b>	<b>81</b>	<b>16</b>	<b>21</b>	<b>118</b>
<b>% of groups answering</b>	<b>84%</b>	<b>16%</b>		
<b>Individuals</b>	<b>1679</b>	<b>812</b>	<b>338</b>	<b>2829</b>
<b>% of individuals answering</b>	<b>67%</b>	<b>33%</b>		
<b>All respondents</b>	<b>1760</b>	<b>828</b>	<b>359</b>	<b>2947</b>
<b>% of all respondents</b>	<b>60%</b>	<b>28%</b>	<b>12%</b>	
<b>% of all those answering</b>	<b>68%</b>	<b>32%</b>		

- 3.3 The majority of respondents who answered Question 4a (68%) agree that free bus travel should be provided for Modern Apprentices, while 32% disagree. Among organisational respondents, 84% of those who answered the question agree, while the proportion of individuals in agreement is rather lower at 67%.
- 3.4 Chart 5 below illustrates the difference in views between organisational respondents, individual respondents, and all respondents.

**Chart 5: Question 4a: Responses by proportion of respondent type**



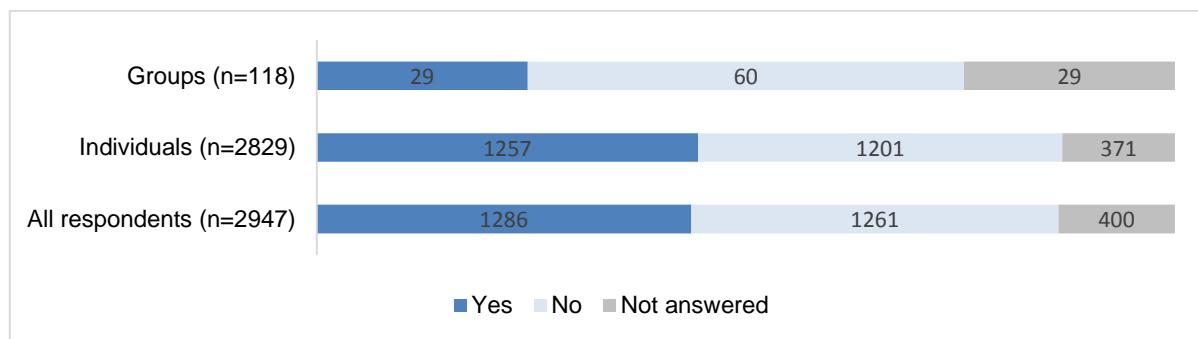
**Table 7: Question 4b: Should this be targeted at Modern Apprentices under Age 21?  
– responses by respondent type**

Type of respondent	Yes	No	Not answered	Total
<b>Groups:</b>				
Bus Operator		5	2	7
Community Council or Residents' Group	4	6	1	11
Community Transport Group or Association	4	2	1	7
Local Authority	3	16	2	21
Other		4	3	7
Professional or Representative Body	1	2	2	5
Third Sector or Membership Organisation	11	9	15	35
Training or Employability Organisation	2	7		9
Transport Partnership or Forum	1	6	1	8
Union or Political Group	3	3	2	8
<b>Total Groups</b>	<b>29</b>	<b>60</b>	<b>29</b>	<b>118</b>
<b>% of groups answering</b>	<b>33%</b>	<b>67%</b>		
<b>Individuals</b>	<b>1257</b>	<b>1201</b>	<b>371</b>	<b>2829</b>
<b>% of individuals answering</b>	<b>51%</b>	<b>49%</b>		<b>%</b>
<b>All respondents</b>	<b>1286</b>	<b>1261</b>	<b>400</b>	<b>2947</b>
<b>% of all respondents</b>	<b>44%</b>	<b>43%</b>	<b>14%*</b>	
<b>% of all those answering</b>	<b>50%</b>	<b>50%</b>		

\* Figures do not sum to 100% due to rounding

- 3.5 Overall, respondents who answered Question 4b are evenly divided as to whether the proposed benefit should be targeted at Modern Apprentices under age 21. Among organisational respondents, however, only 33% agree, and there are only two groups (Community Transport Group or Association and Third Sector or Membership Organisation) in which a majority agree.
- 3.6 Chart 6 below illustrates the difference in views between organisational respondents, individual respondents, and all respondents.

**Chart 6: Question 4b: Responses by proportion of respondent type**

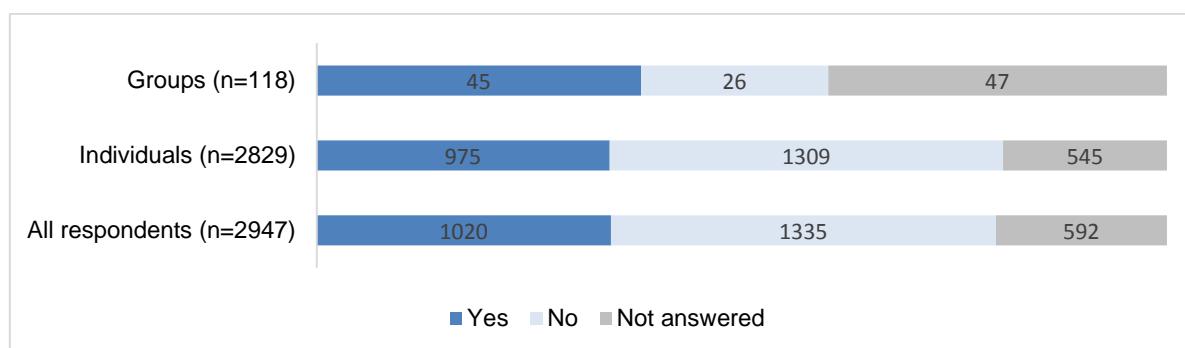


**Table 8: Question 4c: Is there a better way to provide support to help with the travel costs of Modern Apprentices? – Responses by respondent type**

Type of respondent	Yes	No	Not answered	Total
<b>Groups:</b>				
Bus Operator	3	2	2	7
Community Council or Residents' Group	2	6	3	11
Community Transport Group or Association	3	2	2	7
Local Authority	11	2	8	21
Other	2	2	3	7
Professional or Representative Body	2	1	2	5
Third Sector or Membership Organisation	10	6	19	35
Training or Employability Organisation	5	4		9
Regional Transport Partnership	5		3	8
Union or Political Group	2	1	5	8
<b>Total Groups</b>	<b>45</b>	<b>26</b>	<b>47</b>	<b>118</b>
<b>% of groups answering</b>	<b>63%</b>	<b>37%</b>		
<b>Individuals</b>	<b>975</b>	<b>1309</b>	<b>545</b>	<b>2829</b>
<b>% of individuals answering</b>	<b>43%</b>	<b>57%</b>		
<b>All respondents</b>	<b>1020</b>	<b>1335</b>	<b>592</b>	<b>2947</b>
<b>% of all respondents</b>	<b>35%</b>	<b>45%</b>	<b>20%</b>	
<b>% of all those answering</b>	<b>43%</b>	<b>57%</b>		

- 3.7 The majority of respondents who answered Question 4c (57%) do not think there is a better way to provide support to help with the travel costs of Modern Apprentices. However, a majority of organisational respondents (63%) think that there is a better way.
- 3.8 Chart 7 below illustrates the difference in views between organisational respondents, individual respondents, and all respondents.

**Chart 7: Question 4c: Responses by proportion of respondent type**



- 3.9 A total of 1,777 respondents made further comments at Question 4, with a small number simply saying they are unsure or do not know enough about the issue to give a view.
- 3.10 Of the remaining 1,699 respondents who commented, 992 say that they are in favour of providing free bus travel to Modern Apprentices. Around 1 in 4 of these respondents simply make a broad statement in support of the proposal. An example of the types of comment made is:
- “Free bus travel would be a great support to young people and help them get into the world of work.”*
- 3.11 There are three other main issues highlighted primarily or exclusively by those who agree at Question 4a. The first of these is that Modern Apprentices are not well paid and either need or would very much benefit from free bus travel. Many of those who agree make this point. For example, one respondent thinks that:
- “...as a means of encouraging young people to undertake modern apprenticeships this would be helpful - these young people will be on limited incomes.”*
- 3.12 The second issue is that no age limit should be applied, and all Modern Apprentices should be able to access free bus travel. Many of those who agree at Question 4a make this point. Supporting points include that people can take on a Modern Apprenticeship at any age. For example, a Training or Employability Organisation respondent highlights that approximately 25% of their Modern Apprenticeship starts are over the age of 21. It is also suggested that it is not reasonable to treat Modern Apprentices differently purely on the basis of their age. Others note that older apprentices may have additional financial commitments, including family commitments, and assistance may be more important or necessary for them.
- 3.13 Another organisational respondent makes a specific set of points in relation to looked after children, young people, and care leavers. They note that Corporate Parenting responsibilities apply equally up to a care leaver's 26<sup>th</sup> birthday and suggest that care leavers who are Modern Apprentices should be entitled to free bus travel until they are 26 years old.
- 3.14 The third issue is that concessionary travel for Modern Apprentices should be extended to other modes of public transport. Some of those who agree at

Question 4a and provide comments make this point. They are most likely to suggest that concessionary travel should also be extended to cover trains, although there are also references to ferries, trams and the Glasgow subway. Respondents sometimes highlight that it may not always be possible for Modern Apprentices to get to work by bus, particularly if they live in rural areas. The challenges faced by Modern Apprentices living in rural areas are highlighted by both those who agree and disagree with providing Modern Apprentices with a bus pass and are discussed further below.

- 3.15 A total of 686 respondents<sup>2</sup> who do not agree with providing free bus travel to Modern Apprentices provide further comments. Of these, a number make a broad statement of disagreement. For example:

*"They are already being paid and will be given a better career choice with better opportunities. They do not require to receive another benefit."*

- 3.16 The other main issue highlighted primarily by those who disagree with Modern Apprentices receiving free bus travel is that Modern Apprentices have an income and should be expected to cover their costs in the same way that others do or did. An associated point, also made by a number of these respondents, is that young people need to learn budgeting skills and how to make their money cover all their outgoings. For example, one respondent comments that:

*"It's important to teach young people you don't get something for nothing. It will also help them budget and better reflect real life."*

- 3.17 Other frequently-made comments are raised by both those who agree and disagree that Modern Apprentices should receive free bus travel. They include that Modern Apprentices should be paid better and/or receive the living wage. The majority of those raising this issue are not in favour of Modern Apprentices receiving a bus pass. An example of the type of comment made is:

*"Pay them a decent wage so they can afford to pay for it themselves."*

- 3.18 On a similar theme, a number of respondents suggest that employers should cover the travel costs of Modern Apprentices. This group is relatively evenly divided between those who agree and disagree with Modern Apprentices receiving a bus pass. A common theme is that employers will benefit from having a Modern Apprentice and that it is therefore appropriate that they, rather than the tax payer, cover travel costs. Some respondents suggest that employers should at least make a contribution.

- 3.19 Other comments include:

- Questions as to why Modern Apprentices are being singled out for concessionary travel, particularly relative to other young people. For example, one respondent says:

*"I do not see why Modern Apprentices should be offered this as other young people equally might require free transport. All or none...."*

---

<sup>2</sup> 21 respondents who did not answer the first closed question at Question 4 also made a comment.

- Other respondents suggest that a wider range of young people should be covered, with various suggestions including that: all young people; all working young people; and all in education (including school or further education) should be able to access concessionary travel. A smaller number of respondents also highlight other groups, such as the unemployed or those on a low wage, who they feel could benefit.
- Any concessionary travel arrangements should only apply to trips to and from the workplace or that are work-connected. Some suggest that the pass should only be valid during work hours. However, a Training or Employability Organisation respondent notes that Modern Apprenticeships could involve people working or travelling during unsocial hours/outside the standard working day.
- It is important to remember that Modern Apprentices living in rural or remote areas will face particular challenges and that concessionary bus travel may bring little if any benefit. Challenges highlighted include that there may be no useable bus routes operating in their area and/or that the buses may not run at a time which allows people to travel to and from work. A number of those who highlight these issues suggest ways in which these problems could be mitigated. These issues are discussed further below.

3.20 Finally, a number of respondents make comments about whether there are better or alternative ways to provide support to help with the travel costs of Modern Apprentices. This group does not include those who refer only to employers making a contribution or to paying Modern Apprentices better. These suggestions are very diverse but the two most-frequently made are:

- Some form of discounted fare. Specific suggestions include that Modern Apprentices should pay half fare or should have access to discounted weekly travel passes. Some respondents make specific reference to the Young Scot card.
- A grant or bursary to cover or subsidise travel costs.

3.21 Other suggestions made, in each case only by a relatively small number of respondents, include supporting Modern Apprentices to use other forms of transport (such as bicycles or taxis) and reimbursing Modern Apprentice's travel costs. Supporting young people to learn to drive or access a car, including specific reference to the Wheels to Work scheme, is also suggested. This is often linked to the limited if any bus-related options available to Modern Apprentices living in rural areas.

## 4. COMPANION CARDS FOR DISABLED CHILDREN UNDER AGE 5

- 4.1 The consultation paper noted that children under 5 generally travel for free on the bus and that as a result access to a disabled bus pass starts at age 5. However, this means that the parents and carers of otherwise eligible disabled under 5s have to pay for their bus travel when, at age 5, the disabled child may qualify for a companion card or bus pass. A companion bus pass is given to someone who is not able to safely travel on their own and allows the companion also to travel for free. The Scottish Government is proposing to fix this anomaly by providing disabled under 5s with access to a companion bus pass where this is needed.

**Question 5: Are you in favour of providing a companion card for disabled under 5s where this is needed?**

- 4.2 Responses by respondent type are set out in Table 9 below.

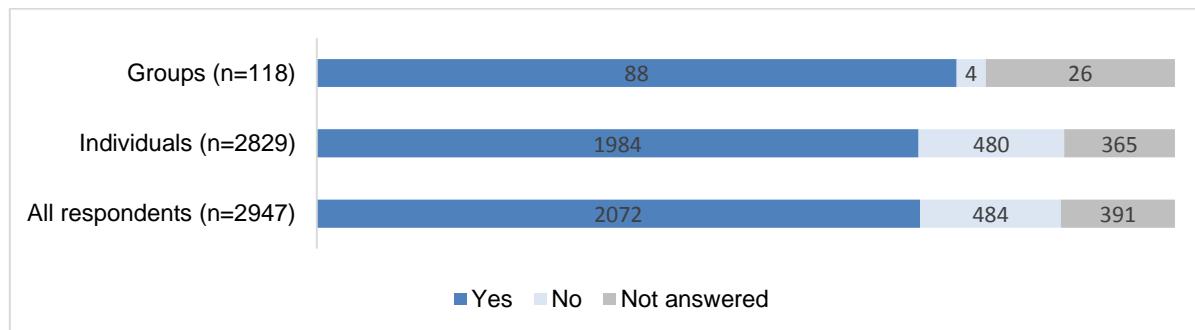
**Table 9: Question 5: Are you in favour of providing a companion card for disabled under 5s where this is needed? – Responses by respondent type**

Type of respondent	Yes	No	Not answered	Total
<b>Groups:</b>				
Bus Operator	6	1		7
Community Council or Residents' Group	10		1	11
Community Transport Group or Association	6	1		7
Local Authority	19	1	1	21
Other	5		2	7
Professional or Representative Body	5			5
Third Sector or Membership Organisation	22		13	35
Training or Employability Organisation	3		6	9
Regional Transport Partnership	8			8
Union or Political Group	4	1	3	8
<b>Total Groups</b>	<b>88</b>	<b>4</b>	<b>26</b>	<b>118</b>
<b>% of groups answering</b>	<b>96%</b>	<b>4%</b>		
<b>Individuals</b>	<b>1984</b>	<b>480</b>	<b>365</b>	<b>2829</b>
<b>% of individuals answering</b>	<b>81%</b>	<b>19%</b>		
<b>All respondents</b>	<b>2072</b>	<b>484</b>	<b>391</b>	<b>2947</b>
<b>% of all respondents</b>	<b>70%</b>	<b>16%</b>	<b>13%*</b>	
<b>% of all those answering</b>	<b>81%</b>	<b>19%</b>		

\* Figures do not sum to 100% due to rounding

- 4.3 A substantial majority of those who answered Question 5 (81%) are in favour of providing a companion card for disabled under 5s where this is needed, while 19% are not. The proportion of organisational respondents who agree is even higher at 96%.
- 4.4 Chart 8 below illustrates the difference in views between organisational respondents, individual respondents, and all respondents.

**Chart 8: Question 5: Responses by proportion of respondent type**



- 4.5 A total of 1,720 respondents commented at Question 5. Of these, 1,324 are in favour of providing a companion card, 380 are not in favour and 16 did not answer the yes/no question.
- 4.6 Many of the further comments are very brief. This is particularly the case amongst those who agree with the proposal. Around 2 in 5 of those who agree and comment make a broad statement in support of the proposal. These comments often suggest the proposal is reasonable, sensible or fair.
- 4.7 There are two other frequently-made points by respondents who are in favour of the proposal. The first of these is that families with a child with a disability may face particular challenges, and some of these may incur additional costs. Around 1 in 3 of those in favour raise this issue. An example of the type of comment made is:
 

*“Families with disabled children have significant extra costs and a lot of appointments to attend and this would help.”*
- 4.8 Associated points include that it is very important that travel costs do not restrict the social and other opportunities that are available to disabled children under 5. Respondents sometimes note that caring for a disabled child under 5 may also mean that parents or carers have limited earning potential and hence that travel costs would be a significant additional burden.
- 4.9 The other frequently-raised issue is that it is not logical to have two different arrangements for disabled children under and over 5 and that the Scottish Government is right to address this anomaly. A number of respondents note that they are surprised that companion cards are not already available for disabled under 5s and/or suggest that standardising the treatment of the under and over 5s is the logical and right thing to do.

4.10 The most-frequently raised point by those who disagree is that the proposed approach would discriminate against the parents or carers of all other children under 5. Some people also make the point that any child under 5 will always need to be accompanied on the bus and feel that it is not relevant that the child has a disability. Around 2 in 5 of those not in favour raise this issue. An example of the types of comment made is:

*"All children under five have to be accompanied by a fare paying person whether they are disabled or not. Treat them all equally with no special treatment for the disabled."*

4.11 A smaller number of respondents suggest that the families of disabled children will already be in receipt of allowances or benefits (such as Disability Living Allowance, Personal Independence Payments or Carers Allowance), and that it is reasonable to assume that these would cover travel costs.

4.12 Finally, there are three issues raised by both those in favour and not in favour of the proposal. These are that:

- The approach could be open to abuse, particularly with adults using the concessionary pass when not travelling with the disabled child.
- A concessionary pass should only be made available after an assessment of need. Respondents are most likely to refer to level of disability and/or some form of means testing.
- Parents or carers should not be eligible for a concessionary pass if the family has a Motability car or other means of subsidised transport.

## 5. OTHER ISSUES

**Question 6: Do you have any other comments about any of the issues raised in this consultation?**

- 5.1 At Question 6 respondents were invited to make other comments on the issues covered by the consultation, and 1,496 did so. Issues already addressed at earlier questions are not repeated in the analysis below, although several subjects raised at relatively low frequency at individual questions but recurring throughout the consultation are noted briefly. Several of the subjects covered in paragraphs 5.4 – 5.12 were typically raised by those representing organisations, and so by definition are made by relatively small numbers of respondents.
- 5.2 Also included here is analysis of comments respondents left in Annex C, where the consultation paper set out four alternative options for change that the Scottish Government is not minded to adopt but on which it invited comment.

### Comments on the consultation process

- 5.3 A number of respondents make points on aspects of the consultation process including:
  - Scope and design of the consultation: It is argued that the process would have been improved by consulting on all potential options and by framing some of the questions differently. In the opinion of some respondents, issues around the scope and wording of the consultation create doubt as to value of the process and contribute to their view that a decision to raise the age of eligibility has already been made.
  - Publicity: It is also suggested that the consultation was not well advertised.

### Socio-Economic Duty

- 5.4 A small number of respondents consider the key policy objectives for the Scheme, as detailed in the consultation paper, sometimes expressing a view that the wider benefits the Scheme has realised should not be jeopardised, or that insufficient attention has been paid to the potential, unintended consequences of the changes being considered.
- 5.5 Several respondents note the Scottish Government's recent consultation on its proposals to introduce a socio-economic duty requiring public sector bodies to consider how they can reduce poverty and inequality when making decisions affecting people's lives. In this context, it is suggested further consideration should be given to the potential impacts on the health and well-being of older people, particularly in deprived communities. Specifically, it is argued that a wider impact assessment for the changes proposed is needed to demonstrate that Transport Scotland has understood and taken account of socio-economic inequality issues.

### Providing opportunity for improvements to public transport

- 5.6 Local Authority respondents in particular comment on potential outcomes for the bus industry and for bus services. It is suggested that a likely drop in passenger

numbers and a reduction in payments to operators could cause services to be withdrawn and the bus network to shrink - an adverse outcome for all bus users and one that is contrary to the objective for the Scheme to improve public transport. This is thought to be a particularly serious issue for rural areas or semi-urban areas where services are less profitable, and to have the potential to put pressure on Local Authorities to provide alternative support for services. It is also argued that the effects could be most pronounced in those areas of the country where the network is particularly reliant on concessionary passengers. One Regional Transport Partnership respondent notes that on some routes in their region, over 90% of journeys are made by concessionary passengers.

### **Reimbursement for bus operators**

- 5.7 Maintaining a “no better, no worse off” position for bus operators with a standard reimbursement rate is also a key objective of the Scheme. A number of Bus Operator respondents argue that this is no longer the case and that further cuts in reimbursement, or granting of concessions to additional groups of passengers, may lead to reductions in services or higher fares.
- 5.8 Other respondents suggest that the rate of reimbursement should not be pegged to adult single fares, since this may encourage operators to set single fares at a high level while offering discounts on other ticket types. As well as increasing the cost to the Scottish Government, it is argued that high single ticket prices could deter other passengers and suppress overall bus usage. Instead a “basket approach” looking at a range of the fares offered by an operator is proposed.
- 5.9 Across the consultation as a whole, a small number of respondents propose either renationalisation or greater regulation of the bus industry.

### **Redressing the balance for rural areas**

- 5.10 The perceived greater benefits of the Scheme to urban areas over rural ones are noted by a number of respondents, sometimes suggesting that more should be done to redress this imbalance. One Community Council or Residents’ Group respondent proposes that, as an alternative to the present flat rate reimbursement for operators, higher subsidies for rural routes should be considered. Other suggestions include supporting provision of demand responsive services, or giving island residents the opportunity of more frequent free ferry travel.

### **Effects on other concessionary schemes**

- 5.11 Potential knock-on effects of changes to the Scheme are also noted. One Regional Transport Partnership respondent notes that, for practical reasons, their own concessionary scheme could not operate with different age eligibility from that set by Scottish Government. In consequence, changes to the national Scheme will also reduce the number of their local cardholders able to access discounts on rail, subway and ferry routes. Clarification is also sought as to the effect of proposed age eligibility changes to the Scottish Government’s commitment to provide a number of free ferry tickets each year.

5.12 Elsewhere in their consultation responses, a very small number of respondents refer to the other, non-travel-related benefits or discounts that they can access by virtue of being bus pass holders. For example:

*"Our bus pass is a gateway to other services such as concessionary theatre and cinema tickets as well as exhibitions."*

### **Alternative options that the Scottish Government is not minded to adopt**

5.13 The consultation paper explained that the Scottish Government had also considered four other ways that the Scheme might be changed to make it more sustainable, but that it was not minded to adopt any of these. They were:

- **Option 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. However, it could lengthen boarding times.
- **Option 2:** 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. However, new administrative arrangements would be needed.
- **Option 3:** 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.
- **Option 4:** 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. 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.

5.14 The Scottish Government does not favour Options 1 or 2 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 people, and is also not minded to pursue Options 3 or 4 at the moment, given potential implementation and operational issues.

5.15 A further 2,021 respondents left comments at Annex C, either giving their views on the four options set out above, suggesting alternative ways of funding the Scheme, or for making suggestions for improvements. Somewhere in their response to the consultation as a whole, many respondents made suggestions for alternative restrictions on the use of the bus pass or suggested alternative ways of funding the Scheme.

## Comments on Options 1 - 4

- 5.16 Amongst those respondents who commented at Annex C, a small number argue that the Scottish Government's rejection of these options devalues the consultation exercise as a whole, or express their frustration on finding that ideas they put forward at earlier questions have already been ruled out. However, others agree with the arguments set out within the consultation paper, including that administration costs may be high. Others suggest that any charges would be likely to go up over time.
- 5.17 Around 8 in 10 of those who commented suggest that they consider at least one of the options to be a good idea or worthy of further consideration, with a small number adding that they would prefer this to seeing the age criteria raised. Overall, respondents are equally supportive of Options 1 and 2 – with around 2 in 3 respondents who make a specific comment suggesting a willingness to consider these approaches. Options 3 and 4 are markedly less popular. It is of course the case that many respondents who express a willingness to consider one or more of the options also state a preference for leaving the existing criteria unchanged, and that many respondents who agree with the Scottish Government's position in not favouring Options 1 to 4 are also opposed to increasing the age of eligibility.

### Option 1

- 5.18 A total of 1,132 respondents made comments on Option 1. These include respondents who think the Scottish Government is right to reject all options, and those who think all options are acceptable or worthy of further consideration. Amongst this group:
- Most respondents suggest they would be prepared to pay a small sum towards the cost of their bus fare, or that some people could pay such a sum.
  - Some reject the idea.
  - A smaller number have a mixed view, seeing advantages but also problems.

- 5.19 Those who think Option 1 has merit often simply suggest that a small contribution would be acceptable, and in some cases, that they think others they know will take a similar view. For example:

*"This is anecdotal but I haven't met one single person who already has a bus pass who wouldn't be willing to pay a token amount for every journey taken (50p being the most common suggestion)."*

- 5.20 In a small number of cases, organisational respondents report on their own experience, or on findings from their own surveys or feedback, bearing out this observation.
- 5.21 Amongst respondents who give an indication of the level of fare they consider acceptable:
- Most suggest 50p.

- Many suggest 20p.
  - Some suggest £1 or more, although sometimes that this should be for longer distance travel or for a day pass.<sup>3</sup>
- 5.22 In addition to raising money to fund the Scheme, potential benefits to both health and to the timetable are identified by a small number of respondents who suggest a small charge would deter people from using buses to travel very short distances – sometimes only a single stop. It is argued that this could be beneficial to health if people are encouraged to walk short distances, and would be better for running times if buses do not need to stop as often.

5.23 Other suggestions with regard to Option 1 involve:

- Some element of means testing, or otherwise ensuring that the least well off are not adversely affected. Exemption from any charge for those under a particular income or in receipt of benefits is proposed by a small number of respondents.
- Giving individuals between 60 and SPA the opportunity to pay a concessionary fare rather than having to pay full fare until qualifying for free travel.

## Option 2

5.24 A total of 1,067 respondents made comments on Option 2. Amongst this group:

- Most respondents suggest they would be prepared to pay an annual charge for their bus pass, or that some people could pay such a sum.
- Many respondents reject the idea.
- A smaller number have a mixed view, seeing advantages but also problems.

5.25 Points made specifically against an annual fee include that even £10 might be difficult for some to afford, and that an annual charge would disadvantage both those who make relatively little use of their bus pass and also those in rural areas who may have few opportunities to use a bus pass.

5.26 Amongst respondents who give an indication of the annual fee they consider acceptable:

- Most suggest £10.
- Many suggest £20.
- A smaller number suggest more than £20, with £50 being the most frequently-made suggestion.

---

<sup>3</sup> Several respondents indicate more than one value, typically that either 20p or 50p would be acceptable.

5.27 Respondents who support the idea of an annual charge sometimes suggest that this would be a payment similar to that for the railcard or blue badge for parking. Others suggest that:

- The charge should be reduced or waived for those on the lowest incomes or in receipt of benefits.
- A notional value could be given to the pass as a taxable benefit, so those paying higher rate tax would pay more for the pass.
- Payment of any charge could be voluntary.
- The charge could be age-related and possibly graduated. The most frequent suggestion is that those between the age of 60 and pension age could pay for a pass, which would be free thereafter. For example:

*"I realise the Scottish government isn't in favour of card holders having to pay for the use of the travel pass. I totally agree with that for somebody who's already reached the legal Pension age. But how about a half-way house? The Scottish Government retaining the bus pass at 60 BUT you make an annual contribution until you reach your legal Pension age."*

5.28 A small number of respondents suggest that a combination of Options 1 and 2 – giving passengers the choice of a small contribution to each fare or to pay an annual charge could be acceptable.

### Option 3

5.29 A total of 805 respondents made comments on Option 3. Some respondents refer to limiting travel, others to imposing a charge for travel at peak time.

5.30 Amongst this group:

- Most respondents reject the idea.
- Many suggest they would approve of some restriction on peak hours travel.
- A smaller number have a mixed view.

5.31 Points made against any restrictions include: potential confusion about what constitutes “peak” travel; difficulties associated with attending doctor or hospital appointments; and that, in some rural areas, the low frequency of services and long journey times may mean that there is no alternative to travelling during peak hours. It is also argued that passengers may switch to using a car rather than changing their travel time or paying a fare, and that restricting peak travel might make little difference as most older people in any case avoid travelling at busy times unless they must.

5.32 Those who argue in favour of some restrictions on peak travel often refer to travel to work – either that limiting travel times would be desirable to curtail use of free travel by those still in work, or that commuters may currently find themselves adversely affected by the number of concessionary passengers using the same services. It is argued that any restriction might be limited to urban areas or to certain routes only. For example:

*"I strongly believe that free bus travel on specific key routes should be restricted to off peak times. For the majority of routes, there would be no need for such a restriction, but I have witnessed younger people (who have paid handsomely for their season tickets), commuting from work in Edinburgh to Fife being left at the stop as the bus is filled with people like me enjoying free travel. That's just not fair!"*

- 5.33 A specific restriction on morning peak travel is also proposed by some respondents.
- 5.34 However, others take a different view, opposing any restriction specifically because pass holders need to travel to work, sometimes also citing the increase in SPA. This point is also made with reference to disabled pass holders travelling to work and to Modern Apprentices.

#### Option 4

5.35 A total of 636 respondents made comments on Option 4. Amongst this group:

- Most respondents reject the idea.
- Some respondents suggest they would approve of some sort of cap on the value (or sometimes number) of journeys made.
- A smaller number have a mixed view.

- 5.36 The most frequently-made points concerning a cap on the value of journeys concern administrative issues, and unfairness to those in rural areas.
- 5.37 A number of respondents make points about the difficulty of administering any such a cap, and also that it would be difficult for many users to monitor their usage. Others, however, suggest that this could be an attractive option if/when reliable technology is available.
- 5.38 A frequent argument is that a cap would be unfair to people in rural areas – including the islands - where the value of relatively long journeys could mount up quickly. Other suggestions include that any cap imposed could be higher for rural areas or could be specific to a local authority area.
- 5.39 Other reasons given for opposing any cap on travel include that this could penalise those who need and use their passes the most, including for travel to regular medical appointments and that, given high levels of bus fares, £250 could be used up quite quickly even in urban areas.
- 5.40 Among points made both in favour of a cap and against it are that it might restrict the user's ability to take long distance journeys. For some respondents limiting "holiday" travel over long distances is seen as desirable. Suggestions include leaving local travel unrestricted but imposing a distance or price limit for longer journeys or imposing a charge when travelling outside the local area.
- 5.41 Issues concerning long distance travel, raised at several questions across the consultation, are discussed further below.

## Other suggestions on how the long-term sustainability of concessionary travel could be achieved

### Restrict to local travel

5.42 Although, particularly at Question 1, a number of respondents describe their appreciation of the ability to travel all over Scotland, or that they are particularly looking forward to this, across the consultation as a whole it is more often suggested that long distance travel could or should be restricted. The most frequently-made suggestion is that free travel should apply only within the local or local authority area, or that there should be a cap on the length or price of an individual journey.

5.43 Other suggestions include:

- Discounted travel should be available for long distance journeys or for travel out with the local area. Sums suggested range from £1 to 50% of the full fare.
- Only a limited number of long distance journeys should be allowed each year or excessive use of such services should otherwise be curtailed.
- Passes should be restricted for “Gold” and airport buses.
- Passes should be restricted to regular scheduled services and not allowed for use on seasonal services to popular tourist destinations, described by one respondent as the “pensioner day trip market”.

### Assess eligibility on individual circumstances other than age

5.44 Somewhere within their response to the consultation as a whole, some respondents suggest that either in addition to, or as an alternative to age, there should be some consideration of individual circumstances. This includes a straightforward assertion that a free bus pass should be means tested, but also a more general concept of not receiving the pass if “able to afford to pay”. Those suggesting means testing sometimes add that this could be between the age of 60 and SPA.

### Other funding suggestions

5.45 A number of respondents suggest alternative ways of funding the Scheme, the most frequent being to do so from taxation, primarily by increasing income tax. Smaller numbers of respondents suggest increasing council tax, reviewing the proposed cut to Air Passenger Duty, or imposing a tourist tax. Within the transport arena, small numbers of respondents suggest road tolls, emission charges, and fines collected from speed cameras could be used to provide additional funding.

5.46 Other ideas put forward by a small number of respondents include a range of individual topics or projects where it is suggested savings might be made instead of making cuts to the Concessionary Transport budget. Most frequent amongst these is to review the provision of free prescriptions.

## Suggestions for improvements to the scheme

### Extend to other groups

5.47 Across the consultation, a small number of respondents suggest that they would like to see the Scheme extended to include other groups of people, in addition to those covered at Questions 4 and 5. This includes suggestions that age eligibility should generally be reduced rather than raised, or that all public transport should be free. More specific cases are made for:

- Those who are unemployed and required to travel to Job Centres, particularly in rural areas, northern Scotland and the Islands.
- Those on low incomes or in receipt of certain state benefits.
- Those who are infirm or have long-term illnesses, who may not qualify for Personal Independence Payments or who may receive lower rate payments. People suffering from specific conditions such as Hepatitis C or cancer who might otherwise struggle to afford travel to attend regular medical appointments are highlighted.
- Carers. It is suggested carers should be allowed to travel for free when alone - for example when going to collect the pass holder.
- Foster carers.
- Young people, under 18s, under 16s, children or children going to school.
- Students, including those studying at Further Education level.
- People in recovery from alcohol and/or drug addiction.
- Destitute asylum seekers and people with insecure immigration status. Respondents perceive support provided to asylum seekers and those with insecure immigration status as being at a low level.
- Young asylum seekers and refugees.

### Review companion cards

5.48 It is suggested that criteria for allocation of companion cards should be reviewed. Reasons given by respondents include because they think that:

- The assessment for Personal Independence Payments does not allocate points to someone needing a helper to push a wheelchair or carry shopping, potentially leaving a disabled person in a wheelchair without a companion card and unable to access public transport.
- Companion passes are open to misuse. A number of respondents report their personal observations to support this view.

### Extend to other forms of transport

5.49 Respondents sometimes suggest the Scheme could be improved by extending it to other forms of transport, most frequently to include trains, although Edinburgh trams, the Glasgow subway, and ferry travel are also suggested. It is also noted that travel on late night buses is not currently included. Respondents

also raise issues regarding the Taxicard scheme for those unable to use public transport, and demand responsive services, such as Dial-a Bus.

5.50 Several respondents remark on current levels of variation between regions. At present some Local Authorities fund discounted rail travel for bus pass holders while others do not, and it is suggested that this is unfair. Likewise, it is noted that Taxicard schemes are administered by Local Authorities and so can vary in terms of the benefits provided. Development of a national Taxicard for disabled travellers, as an alternative to the bus pass, is suggested.

5.51 The Scottish Government is also encouraged to use savings made from changes to the existing Scheme to support demand responsive services. Extending the Scheme to include Community Transport services, or to find a sustainable funding solution for Community Transport, is proposed by several respondents who comment on its importance in rural areas where the risk of social isolation can be particularly high. Respondents note that most community transport services are not eligible for inclusion in the concessionary scheme at present as they do not run registered routes.

5.52 A small number of respondents raise issues specific to life on islands and ferry travel. Respondent feel that island residents have, in general, much less opportunity to benefit from the Scheme than those living on the mainland. Suggestions for improvements include:

- The number of free ferry journeys available to the residents of some island communities could be increased from the current allocation of two return journeys a year, or that two return rail vouchers could also be provided.
- Island residents should receive an improved discount on ferry crossings to make them more comparable to bus travel.

#### Administration of disabled passes

5.53 A small number of respondents make points concerning the current requirement that those qualifying for a pass under disability criteria are required to reapply on an annual basis. They feel that this can be particularly challenging for some people.

5.54 It is also suggested that:

- The application process for the National Entitlement card could be simplified and forms made readily available online.
- The list of those authorised to sign applications should be amended, and the process for approval of applications should be standardised across the country.
- The card could be issued automatically when a disability benefit has been awarded, thereby removing the separate application process altogether.

5.55 Finally, on a broader administrative point, it is also suggested that it would be appropriate for Transport Scotland to manage the train and ferry elements of the National Blind Travel Scheme.

## 6. ASSESSING IMPACT

- 6.1 The final section of the consultation asked four questions about the possible impact of the various proposals.

### Equality

- 6.2 Question 7 asked about the impact on particular groups of people with reference to the protected characteristics groups set out in the Equality Act 2010. The 'protected characteristics' are:

- Age.
- Disability.
- Gender reassignment.
- Marriage and civil partnership.
- Pregnancy and maternity.
- Race.
- Religion and belief.
- Sex and sexual orientation.

**Question 7: 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?**

- 6.3 A total of 1,742 respondents commented at Question 7. Of these, 105 respondents say they do not know or do not feel they have enough information or knowledge to comment.
- 6.4 The most frequently-made point among the more substantive comments is that respondents do not think there would be any likely impacts resulting from the proposals. Around 1 in 3 of those commenting take this view.
- 6.5 In terms of the remaining comments, some of these reiterated points made at earlier questions and are already covered in the analysis presented above. Of the comments that apply particularly to the protected characteristics set out above, the most frequently-made is that the proposals would have an age-related impact, with respondents highlighting the impact on older people. An example of the type of comment made is:

*"Any increase in age of eligibility must constitute age discrimination."*

- 6.6 However, while some suggest that the proposals would discriminate based on age (and older age in particular), others suggest that measures which result in older men and older women being treated equally would be fair. A small number of respondents suggest the proposals will have a gender-related impact, with the majority of comments highlighting the particular impact on women. An example of the type of comment made is:

*"There is a group of women born in the 1950s who have been disproportionately affected by the rise in state pension age from 60 to 66. Changing the eligible age for a bus pass would be a double whammy and this group should not be further adversely affected."*

- 6.7 Other age-related comments focus on the impact on younger people. These tend to focus on the travel-related needs of children and younger people and are sometimes connected to the proposals on Modern Apprentices or disabled children under 5. A small number of respondents suggest that the proposals will discriminate against other children or young people who are not entitled to concessionary travel. However, overall, the comments simply note that the proposals will affect children and young people in general terms.

### Safety of Children and Young People

**Question 8: Do you think the proposals contained within this Consultation may have any additional implications on the safety of children and young people?**

- 6.8 A total of 1,687 respondents commented at Question 8. Of these, 115 respondents say they are unsure or do not feel they have enough information or knowledge to comment.
- 6.9 Otherwise, the large majority of respondents suggest they do not expect the proposals to have any additional impact on the safety of children and young people. A total of 1,173 respondents are of this view.
- 6.10 Only 399 additional comments were made, and some of these focus on general issues associated with the safety of public transport and bus travel in particular. Other comments refer to concessionary travel being available for all children and young people with a focus on the potential safety benefits of more children or young people travelling by bus rather than walking or cycling on busy roads.
- 6.11 Amongst comments which refer specifically to the proposals within this consultation, three issues are raised frequently. The first of these is that the proposals for companion cards for disabled children under 5 will have a positive impact. Around 1 in 5 of those who made an additional comment highlight this issue. An example of the type of comment made is:

*"Especially if parents cannot afford to take young disabled children to appointments. If they cannot work due to caring duties, travel funds for appointments may mean food or heating cannot be purchased."*

- 6.12 Another frequently-raised issue is any measures which mean that fewer people are driving could help keep children and young people safe. This is sometimes connected with reduced pollution having positive implications for children's health. Some refer to discouraging young people from acquiring cars or motorcycles as a means of protecting their safety. Others suggest that having fewer older drivers on the road could be positive as this group of drivers may be more likely to have accidents.

6.13 Finally, a number of respondents suggest that children's safety could be affected if their grandparents or other older family members are not able to accompany them due to changes in the concessionary travel arrangements for older people. An example of the type of comment made is:

*"Public transport plays a part in keeping families connected. Young people who are vulnerable in some way may well rely on support from older family members such as a grandparent (below the retirement age). By reducing the use of free bus travel, the frequency and quality of such contact may be reduced and this in turn may have a detrimental effect on the safety of the child or young person."*

## Business and Regulation

6.14 The consultation paper noted that 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.

### **Question 9: Do you think the proposals contained in this Consultation are likely to increase or reduce the costs and burdens placed on any sector?**

6.15 A total of 1,678 respondents made a comment at Question 9. As at some earlier questions, comments tend to be brief and do not always address the specific question directly and it is difficult to draw clear conclusions under these circumstances. Other respondents comment that they are unsure or do not have enough knowledge or information to make a judgment.

6.16 Some respondents note that costs will depend on whichever combination of the proposals set out is taken forward. Others refer to specific proposals or their own suggestions, for example:

*"If a small charge is brought in, or the annual charge, then this may ease the burden of cost" or "If you extend the scheme to new groups without limiting use by current users there will be increased cost".*

6.17 Overall, around the same number that think costs will reduce, also think they will increase. However, a number of those who suggest costs will increase note that they do not see this as being a bad thing; these respondents refer to the direct costs associated with providing concessionary bus travel and think that any additional costs represent a worthwhile use of public funds. This point is sometimes associated with various cost savings for public services or wider economic benefits.

6.18 Some respondents identify sectors or types of organisation that they think will be affected. Comments made suggest that raising the age at which people become eligible for an older person's bus pass will increase cost burdens. The four most frequently-identified sectors are set out in turn below.

#### The voluntary or third sector

6.19 Comments include that the ‘younger retired’ population may be particularly likely to volunteer but that this may no longer be possible if they, or the organisation for which they are volunteering, need to cover travel costs. Other comments suggest that the activities organised by third sector organisations could suffer, either because people cannot afford the travel costs to attend a group or event or because activities which involve bus travel are no longer affordable. One respondent comments:

*“Volunteers and community organisers rely heavily on concessionary travel and the community at large would suffer if folk could not take part in activities because they could not afford to get there.”*

6.20 It is also suggested that demand for the services provided by third sector organisations could increase if people are not able to access subsidised bus travel. Examples given include increased need for hospital care schemes and a general increase in the type of home-based visiting services that aim to tackle social isolation.

#### Public services, particularly the NHS or social care services

6.21 This issue is often associated with older people retaining their health and independence for longer and therefore not needing to make extensive use of key public services, and the NHS in particular. Respondents comment on the benefits around helping to reduce social isolation and/or maintain or increase wellbeing that being able to access subsidised travel can offer. For example, one respondent comments that:

*“The issue of isolation... is one area where a bus pass has value added and can keep people out of hospital and less invisible in society”.*

#### Businesses, and local businesses in smaller or rural communities in particular

6.22 Those raising this issue generally suggest that people who can access concessionary travel will be more willing or able to visit and spend money at businesses, with the most frequent examples given being shops (including high street shops) and cafes.

6.23 A number of respondents make particular reference to the possible impact that changes to the Scheme could have on more remote and rural towns and their businesses. Comments include that the distance travelled and relatively high fares in rural areas could act as a particular deterrent to people making any but the most necessary trips and that local businesses could suffer as a result

6.24 From the ‘customer’ perspective, it is suggested that not being able to access free bus travel could mean that those on limited incomes are not able to travel to and take advantage of the most cost-effective shopping options.

#### Impact on bus operators and the wider transport system

6.25 It is also suggested that any changes would be likely to impact on bus operators. For example, an Other respondent suggests that although the proposals will not directly impact on operators’ costs, they will have an effect on their overall revenues. An associated concern for some respondents is that if

fewer trips are being made, some routes may become unprofitable and services could be reduced or cut altogether. There are concerns that the proposals to change age eligibility will lead to 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."* (Three Regional Transport Partnerships, one Professional or Representative Body respondent, and one Local Authority.)

- 6.26 Respondents raise particular concerns about the viability of rural services, reflecting the view that they are seen as offering some older or disabled people a lifeline. It is also suggested that those who do not have a bus pass but use these services would suffer if bus services become unviable and certain routes no longer operate. The potential to have a negative impact on the rural working age population and economy is particularly noted.
- 6.27 A small number of respondents, primarily organisations, highlight the particular impact that unviable services and/or the loss of services could have on Local Authorities and/or Transport Authorities. Local Authorities and Regional Transport Partnership respondents are among those raising this issue with their main concern being that if services are de-registered by the commercial operator there will be pressure on the Local or Transport Authority to fund their replacement. There is an associated concern that a reduction in journeys made could increase the level of Local Authority support required for subsidised services, particularly in rural areas.
- 6.28 In addition to the four most frequently-raised issues, a number of other points are made by smaller numbers of respondents. These include:
- Environmental impact or cost: If changes to the arrangements result in fewer trips being made by bus, and an increase in the number of trips made by car, this will have an environmental impact. It is also suggested that increased traffic congestion could have a negative impact on Scottish businesses. On an associated point, it is suggested that increased numbers of journeys by car will also increase the costs associated with maintaining the road network.
  - Loss of childcare: The focus here is on grandparents no longer being able to provide informal childcare, including after school care. It is suggested that this could have a cost to families and employers if parents are not able to be in paid employment as a result.
  - Impact on Modern Apprenticeships: Although many of the comments made focus on bus travel for older and disabled people, some respondents comment on the impact of the Modern Apprentices proposals. Most frequently, they suggest that costs to employers will be reduced, with some suggesting this could then have a positive effect on the number of Modern Apprenticeships being made available. A specific comment (made by an Other respondent), is that the sectors most likely to benefit would be:

Construction; Engineering; Automotive; Electrical Installation; and Hospitality.

6.29 Finally, a small number of respondents comment on the resources, and associated costs, required to administer a concessionary bus scheme. The general view is that an approach which is complicated and/or costly to implement and run should be avoided.

### Privacy

6.30 The final question asked respondents about whether the proposals could impact on people's privacy.

**Question 10: Are there any likely impacts the proposals contained in this Consultation may have upon the privacy of individuals?**

6.31 A total of 1,453 respondents made a comment at Question 10. A substantial majority of these respondents (around 7 in 10) said they do not think the proposals will have an impact on the privacy of individuals. Other respondents said they are not sure or feel they are not in a position to make a judgement.

6.32 Amongst the remaining respondents who commented (around 250 respondents), not all made a comment that addressed privacy issues associated with the proposals. For example, some respondents interpreted the question to be referring to the handling of their response to this consultation.

6.33 The most frequently-raised issues by those who commented on any likely privacy impacts of the proposals are that:

- There could be privacy implications for any approach which involved means testing or receipt of a bus pass being dependent on entitlement to other benefits.
- Recording the use of a bus pass, including individual journeys or patterns of travel, could breach the privacy of the pass-holder.
- It will be important to ensure that any information which is gathered and held is protected and only used for the purposes of managing the Scheme. Some respondents reference the Data Protection Act.

## ANNEX 1: GROUP RESPONDENTS

<b>Group Respondent</b>	<b>Group type</b>
A&M Scotland (Achieve More Scotland)	Third Sector or Membership Organisation
Aberdeen City Council	Local Authority
Aberdeen City Council (2 <sup>nd</sup> response)	Local Authority
Aberdeen City Health and Social Care Partnership	Other
Aberdeenshire Council	Local Authority
Age Scotland	Third Sector or Membership Organisation
Angus Council (Officer Response)	Local Authority
ANGUSalive	Third Sector or Membership Organisation
Argyll and Bute Council	Local Authority
Association of Transport Co-ordinating Officers (ATCO) Scotland	Professional or Representative Body
Badenoch & Strathspey Community Transport Company	Community Transport Group or Association
Bo'ness and Area Community Bus association	Community Transport Group or Association
British Red Cross	Third Sector or Membership Organisation
Bus Users Scotland	Third Sector or Membership Organisation
Cairellot Nursery	Training or Employability Organisation
Caithness Transport Forum	Other
Campbeltown Community Council	Community Council or Residents' Group
CELCIS	Other
Celebrate Age Network Forum	Third Sector or Membership Organisation
Chartered Institution of Highways & Transportation, Scottish Policy Forum	Professional or Representative body
Child Poverty Action Group in Scotland	Third Sector or Membership Organisation
Citizens Advice Scotland	Third Sector or Membership Organisation
City and Royal Burgh of Elgin Community Council	Community Council or Residents' Group
City of Edinburgh Council	Local Authority
Civil Engineering Contractors Association Scotland	Training or Employability Organisation
Clackmannanshire Council	Local Authority
Clydesdale Housing	Other
Colleges Scotland	Training or Employability Organisation

<b>Group Respondent</b>	<b>Group type</b>
Comhairle Nan Eilean Siar (Western Isles Council)	Local Authority
Community Transport Association	Community Transport Group or Association
Confederation of Passenger Transport (CPT) Scotland	Professional or Representative body
Construction Industry Training Board (CITB)	Training or Employability Organisation
Craig of Campbeltown Ltd, trading as West Coast Motors and Borders Buses	Bus Operator
Cults, Bieldside and Milltimber Community Council - Aberdeen City	Community Council or Residents' Group
Dalintober & Millknowe Tenants & Residents Association	Community Council or Residents' Group
Dumfries and Galloway Council	Local Authority
Dundee City Council	Local Authority
Dundee Community Transport SCIO	Community Transport Group or Association
Dundee Pensioners' Forum	Third Sector or Membership Organisation
Dundee Voluntary Action	Third Sector or Membership Organisation
E & M Horsburgh	Bus Operator
East Ayrshire Council	Local Authority
Enable Scotland	Third Sector or Membership Organisation
Family Fund	Third Sector or Membership Organisation
Fife Council	Local Authority
Garelochhead Minibuses & Coaches Ltd.	Bus Operator
Get Glasgow Moving	Third Sector or Membership Organisation
Glasgow Branch of the Communist Party	Union or Political Group
Glenburn Community Tenants and Residents Association	Community Council or Residents' Group
Grey Matters (Helensburgh and Lomond)	Third Sector or Membership Organisation
Hepatitis Scotland	Third Sector or Membership Organisation
Heriot-Watt University Student Union	Union or Political Group
Highlands and Islands Regional Transport Partnership (HITRANS)	Regional Transport Partnership
Inclusion Scotland	Third Sector or Membership Organisation
ITCA LIMITES	Training or Employability Organisation
Kelvindale Community Council, Glasgow	Community Council or Residents' Group
Killearnan Community Council	Community Council or Residents' Group

<b>Group Respondent</b>	<b>Group type</b>
Leith North East Edinburgh Care Action Group (NEECAG)	Third Sector or Membership Organisation
Livingston Village Community Council	Community Council or Residents' Group
Lochaber Transport Forum	Third Sector or Membership Organisation
Lothian Buses Limited	Bus Operator
Mobility and Access Committee for Scotland (MACS)	Other
Moray Council	Local Authority
National Federation of the Blind of the UK	Third Sector or Membership Organisation
Nestrans	Regional Transport Partnership
Newtonhill, Muchalls & Cammachmore Community Council	Community Council or Residents' Group
North Ayrshire Council	Local Authority
North Lanarkshire Council	Local Authority
North West Community Bus Association	Community Transport Group or Association
Not for Profit Planning	Other
NUS Scotland	Union or Political Group
Orkney Islands Council	Local Authority
Outside the Box	Third Sector or Membership Organisation
Paths for All	Third Sector or Membership Organisation
Perdixknowe Residents Association	Community Council or Residents' Group
Perth & Kinross Local Authority Unison Retired Members	Union or Political Group
Perth and Kinross Council	Local Authority
Portobello North East Care Action Group (NEECAG)	Third Sector or Membership Organisation
Regional Network - Region 1	Community Council or Residents' Group
Royal College of General Practitioners (Scotland)	Professional or Representative Body
Scottish Accessible Transport Alliance	Third Sector or Membership Organisation
Scottish Association for Mental Health (SAMH)	Third Sector or Membership Organisation
Scottish Association for Public Transport	Third Sector or Membership Organisation
Scottish Borders Council	Local Authority
Scottish Independent Advocacy Alliance	Third Sector or Membership Organisation
Scottish Labour	Union or Political Group

<b>Group Respondent</b>	<b>Group type</b>
Scottish Older People's Assembly	Third Sector or Membership Organisation
Scottish Pensioners Forum	Third Sector or Membership Organisation
Scottish Rural Action	Third Sector or Membership Organisation
SEStran (South East Scotland Transport Partnership)	Regional Transport Partnership
Snow-Camp Youth Charity	Third Sector or Membership Organisation
Society of Chief Officers of Transportation in Scotland (SCOTS)	Professional or Representative Body
South Ayrshire Community Transport	Community Transport Group or Association
South Ayrshire Council	Local Authority
South West of Scotland Transport Partnership (SWestrans)	Regional Transport Partnership
Spoht Training	Training or Employability Organisation
SSVQ LTD	Training or Employability Organisation
Stagecoach Group	Bus Operator
Stirling Council	Local Authority
Strathclyde Concessionary Travel Scheme Joint Committee	Regional Transport Partnership
Strathclyde Partnership for Transport	Regional Transport Partnership
SWI	Third Sector or Membership Organisation
Tactran	Regional Transport Partnership
Tagsa Uibhist	Community Transport Group or Association
Tea and Talk group	Third Sector or Membership Organisation
The Equality and Human Rights Commission	Other
The five Scottish bus operating subsidiaries of FirstGroup plc's UK Bus Division	Bus Operator
Thermal Insulation Contractors Association	Training or Employability Organisation
Training Initiatives Ltd	Training or Employability Organisation
Transform Scotland	Third Sector or Membership Organisation
Unite Glasgow Retired Members Branch	Union or Political Group
Unite the union Scotland	Union or Political Group
West Lothian Council	Local Authority
Women For Independence	Union or Political Group
Xplore Dundee	Bus Operator
Young Scot	Third Sector or Membership Organisation

<b>Group Respondent</b>	<b>Group type</b>
YouthLink Scotland	Third Sector or Membership Organisation
ZetTrans	Regional Transport Partnership



**TRANSPORT**  
**SCOTLAND**  
CÒMHDHAIL ALBA

**Transport Policy**

Buchanan House,  
58 Port Dundas Road,  
Glasgow, G4 0HF  
0141 272 7100  
info@transport.gov.scot

ISBN: 978-1-911582-38-0

© Crown copyright 2018

You may re-use this information (excluding logos and images) free of charge in any format or medium, under the terms of the Open Government Licence. To view this licence, visit <http://www.nationalarchives.gov.uk/doc/open-government-licence> or e-mail: psi@nationalarchives.gsi.gov.uk

Where we have identified any third party copyright information you will need to obtain permission from the copyright holders concerned.

Further copies of this document are available, on request, in audio and visual formats and in community languages. Any enquiries regarding this document / publication should be sent to us at [info@transport.gov.scot](mailto:info@transport.gov.scot)

This document is available on the Transport Scotland website: [www.transport.gov.scot](http://www.transport.gov.scot)  
Published by Transport Scotland, August 2018

Follow us:



@transcotland



@transcotland

**transport.gov.scot**



Scottish Government  
Riaghaltas na h-Alba