



Department for  
**Infrastructure**

An Roinn  
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Department für  
**Infrastructure**

[www.infrastructure-ni.gov.uk](http://www.infrastructure-ni.gov.uk)

# **Draft equality Impact Assessment**

## **Changes to the Northern Ireland Concessionary Fares Scheme**

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## 1. Executive Summary

- 1.1. The Northern Ireland Concessionary Fares Scheme (the Scheme) was established to promote accessible public transport for members of the community who are most at risk of social exclusion<sup>1</sup>. It aims to do so by providing free and discounted fares on public transport for some groups of people.
- 1.2. The Department for Infrastructure (the Department) recognises the importance of free and discounted travel in the everyday lives of older and disabled people. We also understand the important economic, social, and environmental benefits of the Scheme that go beyond the immediate benefits to concessionary fares passengers themselves.
- 1.3. However, like other government departments, the Department is facing significant financial pressures and needs to identify where savings could be made. We also need to make sure that the money we spend is targeted at those who have the greatest need – in terms of the Scheme, this means those who are most vulnerable, or liable, to social exclusion.
- 1.4. We have therefore looked at the Scheme to identify changes to the current eligibility criteria which could reduce the costs of the Scheme while ensuring it continues to deliver its policy aim of reducing social exclusion. At the same time, the Department also recognises there are other changes that could be made to the Scheme that could help promote greater social inclusion in the longer term. We have therefore identified 10 options (changes that could be made to the Scheme). These changes and the rationale for making them are set out in detail in the consultation document and in summary here.
- 1.5. In line with our duties under S75 of the Northern Ireland Act 1998, we have completed both an Equality Screening and draft Equality Impact Assessment (EQIA) to identify what impact

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<sup>1</sup> In Northern Ireland some factors which may contribute to social exclusion, and which can be particularly prevalent are long-term unemployment, disability, literacy problems or living in an isolated or deprived area. Some groups have additional needs, which, if not catered for, could place their most vulnerable members at risk of social exclusion. Examples of such groups might include those most affected by the Troubles, Travellers and members of other ethnic minorities, older people on low incomes, and young people with limited skills. See: [CCRU: New TSN: An agenda for targeting social need and promoting social inclusion in Northern Ireland \(ulster.ac.uk\)](http://ulster.ac.uk/ccru/newtsn)

these changes are likely to have on equality of opportunity. A summary of our findings is set out below.

- 1.6. In developing this draft EQIA, DfI have considered a range of qualitative and quantitative research, as well as issues raised at pre-consultation engagement meetings with stakeholders including Equality Commission for Northern Ireland (ECNI), Inclusive Mobility and Advisory Committee (IMTAC), the Commissioner for Older people (COPNI), the Women’s Resource and Development Agency (WRDA), Age (NI), the Law Centre, Flourish (a group working with victims of Human Trafficking) and Consumer Council (NI).

## Summary of identified equality impacts

### Option 1 – Raising age eligibility

- 1.7. The Department has put forward 3 options:
- Option A – make **no change** to the Scheme, leaving the eligibility rules as they are now; or
  - Option B – **remove the concession** from the 60-64 age group. This would mean that the age of eligibility for the SmartPass would **increase to 65** (the age of eligibility for the existing Senior 65+ SmartPass). The change would apply to existing users as well as new applicants.
  - Option C – **remove the concession** from the 60-64 age group **and raise the age of eligibility to State Pension Age**. The State Pension Age for men and women is currently 66 and will increase to 67 between 2026 and 2028. This would apply to existing users as well as new applicants. However, for practical purposes those with a 65+ SmartPass would continue to be able to use it.

<b>Potential Equality Impact</b>	<b>Yes (Adverse)</b>
<b>Equality Group:</b>	<b>Age, those with dependents</b>
<b>Reason</b>	

Raising the age of eligibility for concessionary fares has the potential to impact on some older people (those age 60-64 (in Option A) and those aged 60-65 (in Option B). This is because some people in these age groups may choose not to travel, or travel less because they will be required to pay a fare. If people reduce travel because they cannot afford to pay for public transport, it could impact on their ability to:

- travel for work, volunteering or caring;
- access services and amenities;
- travel to health or other appointments;
- meet friends and family

This could, in turn, increase their social isolation. It could also impact on the amount of money they have to spend on other things.

Additionally, the proposals could also have an impact on those with multiple identities for example older people (60-64) with a disability (who do not qualify for a disabled person’s pass).

The proposals could also impact on those with dependents (for example, those people who rely on grandparents who travel by public transport, to help with caring responsibilities).

**Option 2 – Limiting SmartPass use to off-peak travel**

1.8. This change would mean that a SmartPass would no longer permit people to travel before 09:30 on weekdays (Mondays to Fridays). A SmartPass user would have to pay a full fare if they wished to use public transport before this time. They will continue to be able to travel for free at other times, including at any time on Saturdays, Sundays, and Bank Holidays.

<b>Potential Equality Impact</b>	<b>Yes (Adverse)</b>
<b>Equality Group:</b>	<b>Age, Disability, People with Dependents</b>

**Reason:** Limiting concessionary travel to off peak only could have an adverse impact on older people and disabled people who use the pass to travel to work; volunteer; who need to travel early to attend medical and other appointments.

The proposals could also impact on those with dependents (for example, those people who rely on grandparents who travel by public transport, to help with caring responsibilities while they are at work).

**Option 3 – Limiting SmartPass use to bus travel only**

- 1.9. This change would mean that a SmartPass could no longer be used to travel by rail. It would allow SmartPass users to travel on bus only.

<b>Potential Equality Impact</b>	<b>Yes (Adverse)</b>
<b>Equality Group:</b>	<b>Age, Disability, People with Dependents</b>
<p><b>Reason:</b> Limiting concessionary travel to bus travel only could have an adverse impact on older and disabled people who mainly use rail services because it is more convenient for them.</p> <p>It also has the potential to reduce public transport accessibility for older people and people with disabilities who find some buses more difficult to use.</p>	

**Option 4 – Application, renewal, and replacement fees**

- 1.10. This change would mean that SmartPass users would pay a fee for applications, renewals, and replacement cards. An application fee would be paid when a person applies for a SmartPass for the first time. A renewal fee would be paid when the SmartPass holder applies to renew their SmartPass. A replacement fee would be paid when a person applies to have a new card issued if their card has been lost or stolen.

<b>Potential Equality Impact</b>	<b>Yes (Neutral/Minor Adverse)</b>
<b>Equality Group:</b>	<b>Age, Disability</b>
<p><b>Reason:</b> Charging a small administration fee (for example £5) when applying for, renewing, or replacing a card could have a potential adverse impact on some older and disabled people on low income. However, given the proposed fee is so low and a one off (rather than recurring charge), the potential impact is expected to be neutral or very low.</p>	

### **Option 5 - Free travel for those currently receiving a half fare concession due to a qualifying disability**

- 1.11. This change would mean that everyone who is currently eligible for a half fare concession would receive free travel. Free travel would be available on all services. This means that free travel (which is currently available on Glider) would apply to Metro, Ulsterbus, Goldline and NI railways.

<b>Potential Equality Impact</b>	<b>Yes (Positive)</b>
<b>Equality Group:</b>	<b>Disability</b>
<p><b>Reason:</b> Increasing the half fare concession to full fare for people with disabilities is likely to have a positive impact on people with disabilities. This is because help with public transport costs can deliver financial savings for disabled people, meaning they have more money to spend on other things.</p> <p>It also has the potential to increase disabled people's access to jobs and education, as well as training and volunteering opportunities. Additionally, free public transport has potential to promote disabled people's participation in local communities and enable disabled people to pay more visits to friends and family, reducing their social exclusion and promoting better health and wellbeing.</p>	

### **Option 6 - Companion passes for disabled people, unable to travel alone**

1.12. This change would mean that, if a person is disabled **and** they are unable to travel alone, they may be entitled to a companion pass. For the avoidance of doubt, companions are not themselves issued with a concessionary travel pass, nor are they able to travel for free unless accompanying a companion pass holder.

<b>Potential Equality Impact</b>	<b>Yes (Positive)</b>
<b>Equality Group:</b>	<b>Disability, Age, People with Dependents</b>
<b>Reason:</b> Providing companion travel is likely to have a positive impact on people with disabilities, older people, and those with dependents. This is because disabled people and older people (e.g., those with mobility issues or cognitive challenges) who need assistance to use public transport would be more likely to use public transport if they had a companion travelling with them, providing them with greater access to a range of opportunities and services, as well as encouraging their participation in the local community, reducing their social exclusion. It would also reduce the cost of travel for carers meaning they would have more money to spend on other things.	

### **Option 7 - Extend the qualifying criteria for a Half Fare SmartPass in line with other jurisdictions**

1.13. This change would widen the qualifying criteria for a SmartPass on the grounds of disability to align it more closely with other UK jurisdictions.

<b>Potential Equality Impact</b>	<b>Yes (Positive)</b>
<b>Equality Group:</b>	<b>Disability</b>
<b>Reason:</b> Extending the qualifying criteria for a disabled persons SmartPass to bring it in line with other jurisdictions is likely to have a positive impact on people with disabilities	



as it would increase the number of people with disabilities that could access and benefit from the Scheme.

### **Option 8 – Free transport for destitute asylum seekers and victims of human trafficking**

1.14. This change would extend the Scheme to provide free transport to asylum seekers receiving asylum support and to victims of human trafficking. Under this new arrangement, all asylum seekers (including those aged between 5-18<sup>2</sup>) receiving such support would be eligible for a SmartPass.

<b>Potential Equality Impact</b>	<b>Yes (Positive)</b>
<b>Equality Group:</b>	<b>Race</b>
<b>Reason:</b> Providing asylum seekers and victims of human trafficking with access to free public transport is likely to have a positive impact on this group (who are more likely to be from a minority ethnic background). This should help them access services and amenities, and to integrate more fully in the community (for example, by helping them attend GP appointments, ESOL classes to learn English, or collect their child from school). This in turn, could help reduce any social exclusion they might experience and promote their integration into the local community.	

### **Option 9 - Changes to the residence test**

1.15. This change would remove the need for applicants to be permanently resident in Northern Ireland for a period of three months and replace it with the ‘primary residence’ test. Applicants would be asked to sign a declaration that Northern Ireland is their primary residence.

<b>Potential Equality Impact</b>	<b>Yes (Positive, Minor)</b>
<b>Equality Group:</b>	<b>Race, Age, Disability</b>

<sup>2</sup> There is a disparity between who is considered a child in Immigration Rules and Translink policy. Those between the ages of 16-18, including those who have arrived with their families and therefore ‘dependants’ and unaccompanied children, are classed as children until the age of 18 for the purposes of asylum law.

**Reason:** Making changes to the residence test wouldn't change eligibility under the Scheme but it would make it easier for older and disabled asylum seekers and other groups who intend to reside in Northern Ireland to access the Scheme. This is particularly important as older and disabled asylum seekers are more likely to have mobility issues and therefore be at higher risk of social exclusion than younger people and those who do not have a disability.

### Option 10 - Proving residency

- 1.16. This change would extend the list of documentation that can be used to prove residency. The list would be reviewed to ensure that it is open to everyone on an equal basis.

Potential Equality Impact	Yes (Positive, Minor)
Equality Group:	Race, Age, Disability
<p><b>Reason:</b> Making changes to the proofs that are acceptable under the Scheme wouldn't change the rules on eligibility, but it would make it easier for some groups of people to apply such as Travellers, asylum seekers and homeless people. This is due to some groups finding it difficult to prove they are eligible for the Scheme, as the list of proofs currently accepted is quite restrictive, when compared to other jurisdictions. Increasing access to public transport for groups of people such as asylum seekers, Travellers and homeless people is particularly important because these groups can experience high levels of social exclusion.</p>	

- 1.17. Research from GB<sup>3</sup> suggests that take up of a concessionary pass is influenced by household income, car ownership, the scope of the local scheme, and the availability of local bus services. The research found that 'car owning households and those with higher incomes have lower propensities to hold a concessionary travel pass, and those who live in areas with more generous entitlements and higher frequency bus services

<sup>3</sup> See: Greener Journeys: The costs and benefits of concessionary bus travel for older and disabled people in Britain. See [5-1.pdf \(greener-vision.com\)](#) (page 4)

have higher levels of pass holding than those who live in areas with less generous entitlements and lower frequency services.<sup>4</sup>

- 1.18. Therefore, the extent of the impacts set out above are likely to depend on a range of factors including a person's level of income, whether they have a driving licence, and/or access to a car and availability of public transport. This means that the proposals will have a differential impact for different people *within* equality groups.
- 1.19. The proposals may also impact differently in both urban and rural areas. For example, according to the Census<sup>5</sup>, in 2021, urban areas had the highest percentage of households without a car or van available. While this figure relates to the general population, it may also mean that SmartPass holders in urban areas are more likely to be reliant on public transport, than those in rural areas.
- 1.20. Uptake of concessionary passes is also higher in urban areas compared with rural areas<sup>6</sup>, possibly because public transport services are more frequent and convenient in urban areas. This may mean that more people in urban areas may be affected by changes to the Concessionary Fares Scheme, because more people hold a SmartPass in those areas.
- 1.21. However, as people who rely on public transport in rural areas may have more limited travel options if they cannot use their SmartPass, the impact of the proposals may be greater for some people in rural areas, including those who use rural transport services.

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<sup>4</sup> Ibid

<sup>5</sup> In 2021, urban areas Belfast (33.9%) and Derry & Strabane (24.6%) had the highest percentage of households without a car or van available. [Census 2021 Main Statistics for Northern Ireland Phase 2 press release \(nisra.gov.uk\)](#)

<sup>6</sup> Based on DfI Management Information for 2018/2019: Translink, [NISRA CPD](#) and [2021 Mid-Year Estimates](#): there is a significant geographical split in percentage take up of Senior and 60+ SmartPasses across Local Government Districts (LGD) in Northern Ireland. DfI management information from 2018/2019 shows that predominantly eastern and urban areas of NI (including Belfast and Derry City and Strabane LGD) have higher levels of take up of concessionary passes. Central and western areas have lower levels, with Fermanagh & Omagh LGD and Mid-Ulster LGD showing the lowest take up rates.

- 1.22. Based on analysis of the NI Travel Survey 2017-2019<sup>7</sup>, by Multiple Deprivation Measure<sup>8</sup> (MDM) Quintile, there are differences in public transport use depending on where respondents live. For example, the proportion of journeys by public transport is higher for those living in the most deprived areas (MDM quintile 1) (8%) than those living in MDM quintiles 2, 3 and 4 (4%, 5% and 4% respectively). However, it is around the same compared to those living in the least deprived areas (MDM quintile 5) (6%).
- 1.23. We have also assessed that those proposals which are likely to have a positive impact on equality of opportunity for minority ethnic groups, may also have a positive impact on good relations. This is because better access to public transport may encourage greater societal mixing, which in turn, has the potential to tackle prejudice and promote understanding<sup>9</sup> between people of different religious belief, political opinion and racial (ethnic) group.

### **Mitigations**

- 1.24. As part of our Section 75 duty, we are required to identify any mitigations to reduce the potential impact of our proposals. These mitigations are set out in detail later in the document and include
- applying the new age eligibility criteria to new applicants only or introducing the new age criteria gradually.
  - continuing to allow people with disabilities to travel at peak time travel.
- 1.25. Consideration will also be given to how to best meet the needs of S75 users in communicating any changes to the Scheme, such as ensuring the application process is provided in accessible formats and advertising the changes in a range of formats and languages.

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<sup>7</sup> DFI analysis of Travel Survey for NI 2017-2019 data. Information on the Survey can be found at [Travel Survey \(TSNI\) | Department for Infrastructure \(infrastructure-ni.gov.uk\)](https://infrastructure-ni.gov.uk)

<sup>8</sup> The Northern Ireland Multiple Deprivation Measure is the official measure of spatial deprivation for Northern Ireland. Further information is available at [Deprivation | Northern Ireland Statistics and Research Agency \(nisra.gov.uk\)](https://nisra.gov.uk)

<sup>9</sup> [The key to a more integrated society: understanding the impact and limits of social mixing | British Politics and Policy at LSE](https://www.lse.ac.uk/PolicyAndPolitics/)

- 1.26. Throughout the consultation process on the draft EQIA, the Department will be engaging with stakeholders on an ongoing basis to identify any potential mitigations that can be made to lessen the negative impact of the proposals or to better promote equality of opportunity and good relations.
- 1.27. Further mitigations may also be identified as part of the consultation process and will be considered during the policy development process.

### **Tell us what you think**

- 1.28. The Department would like to hear your views on our draft EQIA. In particular, we would like you to tell us what you think about:
- the impacts we have identified, including whether you feel there are any impacts we have not identified;
  - the mitigations we have suggested to reduce the potential adverse impact of the proposals, including any new mitigations;
  - information (including any new data or research) which you think would help inform our proposals.
- 1.29. You can respond to our EQIA by completing the relevant section of our Citizenspace survey (on the DfI website) or by emailing us at: [niconcessionaryfaresconsultation@infrastructure-ni.gov.uk](mailto:niconcessionaryfaresconsultation@infrastructure-ni.gov.uk). You can also write to us at

NI Concessionary Fares Scheme Consultation  
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- 1.30. The closing date for responses is 5pm on 24<sup>th</sup> August 2023. Responses submitted after this date will not be accepted.

## **2. Section 75 of the Northern Ireland Act 1998**

2.1. Section 75 of the NI Act 1998 requires the Department of Infrastructure (hereinafter referred to as 'the Department'), in carrying out its functions, to have due regard to the need to promote equality of opportunity between:

- people with different religious beliefs;
- people from different racial groups;
- people of different ages;
- people with different marital status;
- people with different sexual orientations;
- men and women generally;
- people with or without a disability;
- people with or without dependants; and
- people with different political opinions.

2.2. In addition, but without prejudice to the duty above, the Department should also have due regard to the desirability of promoting good relations between people with different religious beliefs, different political opinions or from different racial groups.

2.3. The Disability Discrimination (NI) Order 2006, which came into effect on 1 January 2007, introduced new duties requiring all public authorities, in carrying out their functions, having due regard to the need to:

- promote positive attitudes towards disabled people; and
- encourage participation by disabled people in public life.

2.4. Equality scheme commitments require public authorities to determine if there are any impacts on equality of opportunity and if there are opportunities to better promote equality of opportunity between people within the Section 75 equality categories. Where screening would not be an adequate means of gathering the information that is needed to assess the relevant equality impacts or opportunities, the public authority should proceed to do an Equality Impact Assessment (EQIA).

2.5. In light of this, the Department determined that the proposed revisions to the Northern Ireland Concessionary Fares Scheme required an EQIA.

### 3. Equality Impact Assessment

- 3.1. Policy changes can, in some cases, have an unintentionally greater impact on some specific Section 75 groups than others, for example, on males, females, young or older people, etc. In revising/creating policy, the Department aims to avoid any adverse impacts and, where possible, take action to mitigate against specific adverse impacts.
- 3.2. To comply with its Section 75 obligations, the Department, following an equality screening, is carrying out an EQIA on the proposed changes to the Northern Ireland Concessionary Fares Scheme.
- 3.3. The primary function of an EQIA is to assess whether policy proposals would have a differential impact and in particular, an adverse differential impact, on the categories of persons listed in Section 75, and any subgroups within those categories.
- 3.4. When conducting an EQIA, the Department acts in accordance with the guidance published by the Equality Commission in April 2001 (revised 2005) which recommends that there should be seven steps in the EQIA process:
  - **Step 1** Defining the aims of the policy
  - **Step 2** Consideration of available data and research
  - **Step 3** Assessment of impacts
  - **Step 4** Consideration of measures which may mitigate any adverse impact and alternative policies which may better achieve the promotion of equality of opportunity
  - **Step 5** Formal consultation
  - **Step 6** Decision and publication of the EQIA results
  - **Step 7** Monitoring for adverse impact.
- 3.5. The purpose of this EQIA is to measure the impact that the Department's policy proposals may have on Section 75 groups. This paper aims firstly to set out in summary form the key policy proposals which the Department has developed; and secondly, to identify any impact that such proposals might have.

### 4. Background

- 4.1. The Northern Ireland Concessionary Fares Scheme (the Scheme) is provided for under Article 5 of the Transport (Northern Ireland) Order 1977. The policy aim of the Scheme is

‘to promote social inclusion by improving public transport accessibility through free and concessionary fares for members of the community who are most vulnerable, or liable to social exclusion’, while delivering value for money for passengers and taxpayers.

- 4.2. The Scheme currently provides full fare discounts on public transport, via use of a SmartPass, for eligible applicants over 60 years of age; those who are registered blind; and those in receipt of a war disablement pension. The Scheme also provides half fare discounts to several other groups: eligible applicants registered as partially sighted; those registered with a learning disability; those who have had a driving licence refused or revoked on medical grounds; and those receiving the Mobility Component of Disability Living Allowance (DLA) or Personal Independence Payments (PIP). Applicants must be resident in Northern Ireland for a minimum of three months to be eligible. Children aged 5-16 also get a half fare concession under the Scheme (children under five already receive free travel without reimbursement).
- 4.3. These concessions are available when the eligible person presents their concessionary SmartPass on most bus and rail services, including those operated by Translink, within Northern Ireland. SmartPasses are issued by Translink on behalf of the Department to all eligible persons who apply (except for young people, who do not require a SmartPass).
- 4.4. In addition to promoting social inclusion and promoting independent living (which also has health and well-being benefits), free and discounted transport provides access to vital services, as well as education, employment, and training opportunities.<sup>10</sup>
- 4.5. The financial benefits of concessionary fares may be of particular importance to lower income groups who may have less disposable income to use on “non-essential” travel and who are generally more reliant on public transport<sup>11</sup>. There are

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<sup>10</sup> Department for Transport (2016): [Evaluation of concessionary bus travel: the impacts of the free bus pass \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/541117/evaluation-of-concessionary-bus-travel-the-impacts-of-the-free-bus-pass.pdf). Also see: NI Concessionary Travel Scheme: Survey Analysis: See <https://www.infrastructure-ni.gov.uk/sites/default/files/publications/infrastructure/concessionary-fares-survey-report.pdf>

<sup>11</sup> Research by the Department for Transport (source above) showed that those lower income households are less likely to own a car, which is a significant factor in determining pass take up



also environmental benefits from more people using public transport instead of travelling by car, with evidence suggesting that concessionary travel creates a direct modal shift from private car journeys to public transport<sup>12</sup>, supporting the Department's efforts to reduce the carbon emissions in the transport sector.

4.6. However, the affordability of concessionary fares in recent years has come under greater pressure, creating challenges for the continued delivery of the Scheme in its current format. In line with the policy aim of the Scheme, and to ensure its ongoing financial sustainability, the Department has commenced a policy review, to examine options in relation to eligibility for the Scheme with the objective of ensuring the Scheme is more affordable and targeted at those who it is designed to support. A long list of options was developed and from that, a number of proposals are being put forward for public consultation.

4.7. This EQIA considers the potential equality impacts of making changes to the Scheme.

4.8. The Department considers that an EQIA is necessary as:

- the policy is highly relevant to the promotion of equality of opportunity;
- it affects a large number of people;
- it is a strategic policy with a significant budget attached and;
- an assessment provides a valuable opportunity to examine evidence and make a decision around the proposals to be taken forward and how these will be communicated.

## **5. Policy proposals**

5.1. The Department recognises the importance of free and discounted travel in the everyday lives of older and disabled people and the important economic, social, and environmental

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While the research did not include Northern Ireland, anecdotal evidence suggests that a similar position exists in Northern Ireland.

<sup>12</sup> Department for Transport (2016): [Evaluation of concessionary bus travel: the impacts of the free bus pass \(publishing.service.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/544442/evaluation-of-concessionary-bus-travel-the-impacts-of-the-free-bus-pass.pdf)

benefits of the Scheme that go beyond the immediate benefits to concessionary fares passengers themselves.

- 5.2. However, to protect the Scheme for the future, the Department needs to make sure it is financially sustainable and targeted at those groups of people it is intended to reach. In light of the pressure on the Concessionary Fares budget, the Department has decided to undertake a review of certain aspects of the Scheme (the Review).
- 5.3. A number of proposals have been identified during the Review to put forward for public consultation. These proposals are aimed at aligning the Scheme with the policy aim of supporting those most at risk of social exclusion and/or making the Scheme more financially sustainable so that it can continue for years to come.
- 5.4. The proposals are explained in detail below.

### **Option 1 – Raising age eligibility**

- 5.5. The Department has put forward 3 options:
  - Option A – make **no change** to the Scheme, leaving the eligibility rules as they are now; or
  - Option B – **remove the concession** from the 60-64 age group. This would mean that the age of eligibility for the SmartPass would **increase to 65** (the age of eligibility for the existing Senior 65+ SmartPass). The change would apply to existing users as well as new applicants.
  - Option C – **remove the concession** from the 60-64 age group **and raise the age of eligibility to State Pension Age**. The State Pension Age for men and women is currently 66 and will increase to 67 between 2026 and 2028. This would apply to existing users as well as new applicants. However, for practical purposes those with a 65+SmartPass would continue to be able to use it.

### **Option 2 – Limiting SmartPass use to off-peak travel**

- 5.6. This change would mean that a SmartPass would no longer permit people to travel before 09:30 on weekdays (Mondays to Fridays). A SmartPass user would have to pay a full fare if they wished to use public transport before this time. They will

continue to be able to travel for free at other times, including at any time on Saturdays, Sundays, and Bank Holidays.

### **Option 3 – Limiting SmartPass use to bus travel only**

- 5.7. This change would mean that a SmartPass would no longer permit people to travel by rail. It would allow SmartPass users to travel on bus only.

### **Option 4 – Application, renewal, and replacement fees**

- 5.8. This change would mean that SmartPass users would pay a fee for applications, renewals, and replacement cards. An application fee would be paid when a person applies for a SmartPass for the first time. A renewal fee would be paid when the SmartPass holder applies to renew their SmartPass. A replacement fee would be paid when a person applies to have a new card issued if their card has been lost or stolen.

### **Option 5 - Free travel for those currently receiving a half fare concession due to a qualifying disability**

- 5.9. This change would mean that everyone who is currently eligible for a half fare concession would receive free travel. Free travel would be available on all services. This means that free travel (which is currently available on Glider) would apply to Metro, Ulsterbus, Goldline and NI railways.

### **Option 6 - Companion passes for disabled people, unable to travel alone**

- 5.10. This change would mean that, if a person is disabled **and** they are unable to travel alone, they may be entitled to a companion pass. For the avoidance of doubt, companions are not themselves issued with a concessionary travel pass, nor are they able to travel for free unless accompanying a companion pass holder.

### **Option 7 - Extend the qualifying criteria for a Half Fare SmartPass in line with other jurisdictions**

- 5.11. This change would widen the qualifying criteria for a SmartPass on the grounds of disability to align it more closely with other UK jurisdictions.

### **Option 8 – Free transport for destitute asylum seekers and victims of human trafficking**

- 5.12. This change would extend the Scheme to provide free transport to asylum seekers receiving asylum support and victims of human trafficking. Under this new arrangement, all asylum seekers (including those aged between 5-18<sup>13</sup>) receiving such support would be eligible for a SmartPass.

### **Option 9 - Changes to the residence test**

- 5.13. This change would remove the need for applicants to be permanently resident in Northern Ireland for a period of three months and replace it with the 'primary residence' test. Applicants would be asked to sign a declaration that Northern Ireland is their primary residence.

### **Option 10 - Proving residency**

- 5.14. This change would extend the list of documentation that can be used to prove residency. The list would be reviewed to ensure that it is open to everyone on an equal basis.

## **6. Assessment of Impacts - Summary**

- 6.1. Research<sup>14</sup> on use of the concessionary travel schemes in Northern Ireland, published in 2021, has highlighted a range of benefits for users including greater access to services and opportunities, such as, shopping, education, work, and day trips, as well as visiting family and friends. The Scheme also provides an important gateway to health services: 58% of journeys taken using a SmartPass were identified as being for hospital appointments while 26% were to visit the GP.<sup>15</sup>
- 6.2. Therefore, proposals which reduce the concession available have the potential to have an adverse impact on people's economic, social, and cultural life as well as to exacerbate

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<sup>13</sup> There is a disparity between who is considered a child in Immigration Rules and Translink policy. Those between the ages of 16-18, including those who have arrived with their families and therefore 'dependants' and unaccompanied children, are classed as children until the age of 18 for the purposes of asylum law.

<sup>14</sup> NI Concessionary Travel Scheme: Survey Analysis: See <https://www.infrastructure-ni.gov.uk/sites/default/files/publications/infrastructure/concessionary-fares-survey-report.pdf>

<sup>15</sup> Ibid (page 10) – <https://www.infrastructure-ni.gov.uk/sites/default/files/publications/infrastructure/concessionary-fares-survey-report.pdf>

health inequalities for S75 users and impact on wider economic growth. The S75 most likely to be impacted are:

- age (for older people in the 60-64 group) and gender (as women within this age group are less likely to hold a driving licence and may therefore be more reliant on public transport)
- age and people with disability (by restricting travel to off peak/bus only)
- people with dependents (as some people with dependents may rely on parents falling within this age range to help with caring responsibilities e.g., to look after young children).

6.3. Given that 67% of existing SmartPass holders report using their pass to visit family and friends<sup>16</sup>, there is also a potential residual impact of the plans on good relations<sup>17</sup> and the integration of new communities into Northern Ireland.

6.4. Conversely, some proposals also have the **potential to promote equality of opportunity** for –

- people with disabilities (by providing half fare travel instead of full fare travel for people with disabilities and companion travel)
- people from different racial groups (by providing free travel for asylum seekers and victims of human trafficking)
- older people and those with dependants, (by providing for companion travel for those people with disabilities who are unable to travel alone).

6.5. This is because they have the potential to increase access to services and amenities, as well as employment and training opportunities for people with disabilities and provide a financial benefit to carers who would not need to pay a fare to accompany a disabled person who was unable to travel alone.

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<sup>16</sup> Ibid - <https://www.infrastructure-ni.gov.uk/sites/default/files/publications/infrastructure/concessionary-fares-survey-report.pdf>

<sup>17</sup> For further information see, for example: [Intergroup contact is reliably associated with reduced prejudice, even in the face of group threat and discrimination. \(apa.org\)](#)

- 6.6. A more detailed assessment of the impact of the proposals on each equality group is set out below:

### **Religious belief**

- 6.7. Census data<sup>18</sup> showed that, in 2021, the main current religions in Northern Ireland were: Catholic (42.3%); Presbyterian (16.6%); Church of Ireland (11.5%); Methodist (2.4%); Other Christian denominations (6.9%); and Other religions (1.3%).
- 6.8. Data is not held on the religious belief of Concessionary Fares Scheme users and there is no evidence that there will be any differential impacts from the policy based on religious belief. Additionally, engagement with stakeholders to date has not identified any negative impacts for this S75 group.
- 6.9. It is highly unlikely that the proposals will have a differential impact based on religious belief. However, as part of the formal consultation process the Department intends to consult with a range of stakeholders and the general public to identify any potential equality impacts in relation to each of the S75 groups. This data will be considered as part of the ongoing policy development process and the EQIA will be updated with any relevant information.

### **Political opinion**

- 6.10. In Census 2021<sup>19</sup>, 814,600 people (42.8%) living here identified solely or along with other national identities as 'British'. This is down from 876,600 people (48.4%) in 2011.
- 6.11. The Census<sup>20</sup> also found, 634,600 people (33.3%) living here identified solely or along with other national identities as 'Irish'. This is up from 513,400 people (28.4%) in 2011.
- 6.12. In Census 2021<sup>21</sup>, 598,800 people (31.5%) living here identified solely or along with other national identities as 'Northern Irish'. This is up from 533,100 people (29.4%) in 2011.

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<sup>18</sup> [Census 2021 Main statistics for Northern Ireland - Statistical bulletin - Religion \(nisra.gov.uk\)](https://www.nisra.gov.uk/system/files/statistics/census-2021-main-statistics-for-northern-ireland-phase-1-statistical-bulletin-national-identity.pdf) (page 2)

<sup>19</sup> <https://www.nisra.gov.uk/system/files/statistics/census-2021-main-statistics-for-northern-ireland-phase-1-statistical-bulletin-national-identity.pdf> (page 2)

<sup>20</sup> Ibid - <https://www.nisra.gov.uk/system/files/statistics/census-2021-main-statistics-for-northern-ireland-phase-1-statistical-bulletin-national-identity.pdf> (page 2)

<sup>21</sup> Ibid - <https://www.nisra.gov.uk/system/files/statistics/census-2021-main-statistics-for-northern-ireland-phase-1-statistical-bulletin-national-identity.pdf> (page 2)

6.13. Data is not held on the political opinion of Concessionary Fares Scheme users and there is no evidence that there will be any differential impacts from the policy based on political opinion. Additionally, engagement with stakeholders to date has not flagged up any negative impacts for this S75 group.

6.14. It is highly unlikely that the proposals will have a differential impact based on political opinion. However, as part of the formal consultation process the Department intend to consult with a range of stakeholders and the general public to identify any potential equality impacts in relation to each of the S75 groups. This data will be analysed as part of the ongoing policy development process and the EQIA will be updated with any relevant information.

### **Racial Group**

- **Free transport for asylum seekers and victims of human trafficking**
- **Changes to the residence test**
- **Proving residency**

6.15. According to the Census 2021<sup>22</sup>, 3.4% (65,600) of Northern Ireland's population (1,903,179) comes from a minority ethnic background. The number of people living in Northern Ireland who were born outside the United Kingdom and Ireland has grown from 81,500 people (4.5%) in 2011 to 124,300 people (6.5%) in 2021.<sup>23</sup> Additionally, in 2021 there were 92,500 people resident in Northern Ireland (or 4.9% of our population) who held a non-UK/Ireland passport only.

6.16. Additionally, Census 2021 data on main language, passports and national identity all point to an increasingly diverse population.<sup>24</sup>

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<sup>22</sup> <https://www.nisra.gov.uk/system/files/statistics/census-2021-main-statistics-for-northern-ireland-phase-1-statistical-bulletin-ethnic-group.pdf> (page 2)

<sup>23</sup> <https://www.nisra.gov.uk/system/files/statistics/census-2021-main-statistics-for-northern-ireland-phase-1-statistical-bulletin-country-of-birth.pdf>

<sup>24</sup> For example, Census 2021 shows that in 2021 there were 92,500 people resident in Northern Ireland (or 4.9% of our population) who held a non-UK/Ireland passport only. See: Census 2021 Main statistics for Northern Ireland - Statistical bulletin - Passports held (nisra.gov.uk) [Census 2021 Main statistics for Northern Ireland - Statistical bulletin - Passports held \(nisra.gov.uk\)](https://www.nisra.gov.uk/system/files/statistics/census-2021-main-statistics-for-northern-ireland-phase-1-statistical-bulletin-passports-held.pdf)

- 6.17. Data is not currently held on concessionary fare use by ethnicity, country of birth or passport held. However, early engagement on the proposals with those working with minority ethnic groups has highlighted that asylum seekers, (who are likely to be from a minority ethnic group), are at greater risk of social exclusion within society<sup>25</sup> and therefore, may benefit from measures to improve the accessibility and affordability of public transport.
- 6.18. In relation to impacts of the proposals, a review of concessionary fare schemes in other jurisdictions has also highlighted that the range of proofs acceptable in NI to gain access to the Scheme, are more restrictive than in other nations and that a more flexible approach to providing evidence of eligibility may benefit some minority ethnic groups. Additionally, the removal of the three-month residency requirement may have a positive impact on asylum seekers and victims of human trafficking, as it may make it easier for them to access the Scheme when they first arrive in the country.
- 6.19. The introduction of free travel for asylum seekers and victims of human trafficking (who are more likely to be from a minority ethnic background) may also have a positive impact on equality of opportunity for those from a minority ethnic background. This is because it will increase access to public transport, which has the potential to reduce or remove the barriers these groups may face when accessing key services and amenities, volunteering or visiting friends.<sup>26</sup> Greater participation in the community and interaction with the local community also has important health and well-being benefits.

### **Age**

- 6.20. The population on census day, 21 March 2021, was 1,903,100 – the highest ever recorded. The table and graph below, taken from the Census 2021<sup>27</sup>, shows the NI population by age bandings.

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<sup>25</sup> See for example: Murphy, F. and Vieten, U.M. (2017): Asylum Seekers and Refugees experiences of life in Northern Ireland - [Media,784971,en.pdf \(qub.ac.uk\)](#)

<sup>26</sup> These barriers were highlighted through meetings between DfI and groups representing and working with asylum seekers.

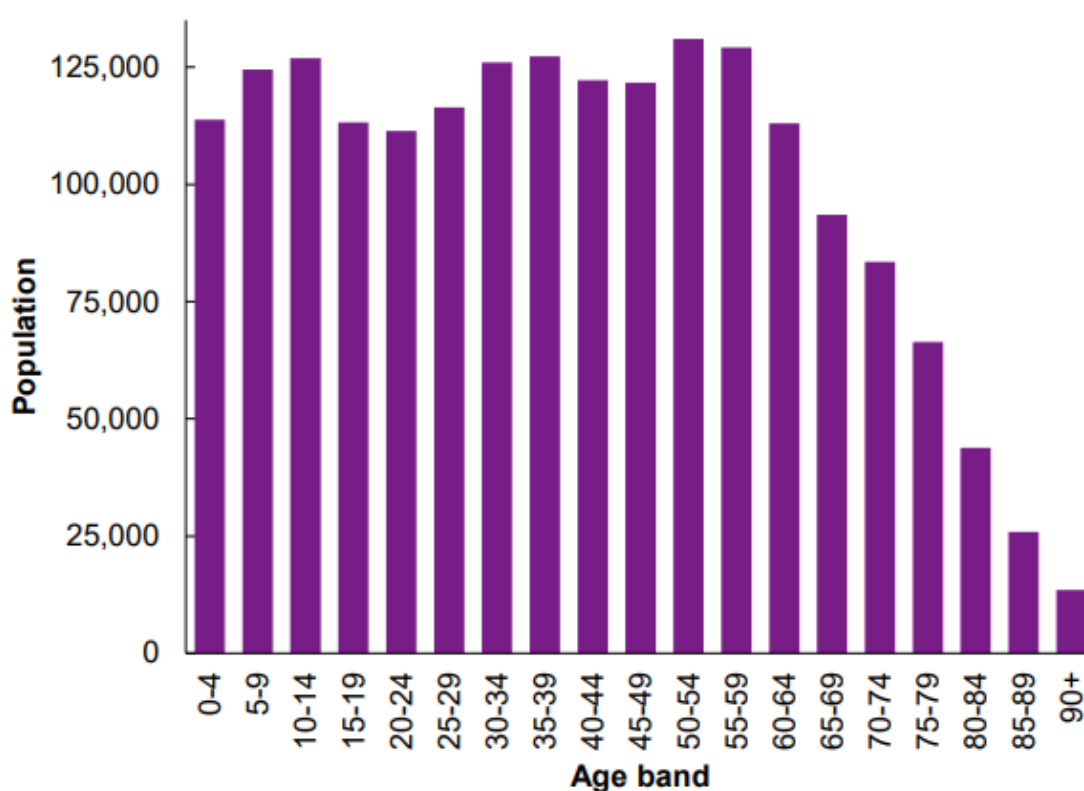
<sup>27</sup> See: [Census 2021 population and household estimates for Northern Ireland: Statistical bulletin \(nisra.gov.uk\)](#)



Age band	2021 Census population	Percentage of population
<b>0-14</b>	365,200	19%
<b>15-64</b>	1,211,400	64%
15-39	594,300	31%
40-64	617,100	32%
<b>65+</b>	326,500	17%
65-84	287,200	15%
85+	39,400	2%
<b>All Ages</b>	<b>1,903,100</b>	<b>100%</b>

Note: Figures may not sum due to rounding

Figure 1: Census 2021 population by five year age band



6.21. The corresponding graph (which provides more disaggregated analysis) shows that the age bands 50 to 54 and 55 to 59 are the most populous, each at around 130,000 people.<sup>28</sup>

6.22. Based on the 2021 Census<sup>29</sup>, since 2011, population increase was greatest in the older age groups. The number of people

<sup>28</sup> See: [Census 2021 population and household estimates for Northern Ireland: Statistical bulletin \(nisra.gov.uk\)](https://www.nisra.gov.uk/census-2021-population-and-household-estimates-for-northern-ireland-statistical-bulletin)

<sup>29</sup> Ibid: [Census 2021 population and household estimates for Northern Ireland: Statistical bulletin \(nisra.gov.uk\)](https://www.nisra.gov.uk/census-2021-population-and-household-estimates-for-northern-ireland-statistical-bulletin)

aged 65 or more rose by over 60,000, to nearly one third of a million people in Census 2021. This is a near 25 per cent increase on 2011 and demonstrates the scale of population change due to ageing.<sup>30</sup>

6.23. According to the 2021 Census, the share of the Northern Ireland population represented by people aged 65 years and over stood at 17.2 per cent in 2021.<sup>31</sup>

6.24. By 2030, NISRA population projections show that there is projected to be 125,598 people aged 60 to 64 in NI: 400,894 of the population are expected to be aged 65 and over by 2030<sup>32</sup>.

- **Raising Age eligibility**

6.25. The principal group to benefit from concessionary fares, in terms of usage of the Scheme, is senior citizens aged 65 and over, followed by those aged 60-64. Approximately 56% of the eligible older population (those aged over 60) use their SmartPass<sup>33</sup>.

6.26. Removing free travel from the 60-64 age group and/or increasing the eligibility based on age to State Pension Age could have a negative impact on some older people within 60-64 age group, particularly those on low income or those living in social isolation, who are reliant on public transport to get around.

6.27. However, those aged 60-64 may be less likely than people aged 65 and over, to face social exclusion. This is because they are more likely to be active and mobile than those in the 65 and over age group.<sup>34</sup>

6.28. Labour Force Survey (LFS) statistics also show that, as expected, the 60-64 age group are more likely to be in employment than those people in the 65 and over age group. According to the LFS Survey<sup>35</sup> in 2022, overall employment

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<sup>30</sup> [Census 2021 Main Statistics for Northern Ireland Phase 1 press release \(nisra.gov.uk\)](https://www.nisra.gov.uk/publications/2021-census-main-statistics-for-northern-ireland-phase-1)

<sup>31</sup> Ibid - [Census 2021 Main Statistics for Northern Ireland Phase 1 press release \(nisra.gov.uk\)](https://www.nisra.gov.uk/publications/2021-census-main-statistics-for-northern-ireland-phase-1)

<sup>32</sup> Based on midyear population estimates - <https://www.nisra.gov.uk/publications/2020-based-interim-population-projections-northern-ireland>

<sup>33</sup> [Northern Ireland Transport Statistics 2018-2019 \(infrastructure-ni.gov.uk\)](https://www.infrastructure-ni.gov.uk/publications/northern-ireland-transport-statistics-2018-2019)

<sup>34</sup> The prevalence of long-term conditions varies with age.- for further information see Census 2021: [Census 2021 Main statistics for Northern Ireland - Statistical bulletin - Health \(nisra.gov.uk\)](https://www.nisra.gov.uk/publications/census-2021-main-statistics-for-northern-ireland-statistical-bulletin-health)

<sup>35</sup> Analysis of Labour Force Survey data <https://www.nisra.gov.uk/system/files/statistics/TblLFS2199.XLSX>.

rates were 52.7% for 60–64-year-olds, compared with 24.9% for 65–69-year-olds and 8.5% for 70–74-year-olds.

- 6.29. Employment rates are, however, different for different equality groups with these cohorts. For example, in 2022, employment rates for females aged 60-64 were 44.1% compared to 61.5% for males of the same age.<sup>36</sup>
- 6.30. The 2022 Labour Force Survey summary report<sup>37</sup> highlighted that older women are also more likely to leave employment earlier than men, with females tending to leave between 63 to 64 and males between the ages of 65 to 66.<sup>38</sup>
- 6.31. Employment rates are also much lower for people who have a disability, compared with those who do not. Only 25.9% of people with a disability in the 60-64 age group were employed, compared to 67.7% of those without a disability.<sup>39</sup>
- 6.32. While those in the 60-64 age group are more likely to be employed than the 65 and over age group, stakeholders<sup>40</sup> representing older people have highlighted that raising the age eligibility for concessionary fares could have a negative impact on some people *within* the 60-64 group, (particularly those on low income, who do not have access to a car or other means of transport, or who are socially isolated).<sup>41</sup>
- 6.33. Stakeholders<sup>42</sup> have also highlighted that removal of the SmartPass from the 60–64-year-old age group and raising the age of eligibility for the concessionary pass could also have some unintended negative consequences on other sector 75 groups. For example, removal of the pass from carers within this age group, or from people with a disability or with mobility issues (who are not entitled to a disabled person’s SmartPass) could make it more difficult for these people to use public transport.

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<sup>36</sup> Ibid – <https://www.nisra.gov.uk/system/files/statistics/TbILFS2199.XLSX>.

<sup>37</sup> 2022 Labour Force Survey annual summary - see <https://www.nisra.gov.uk/system/files/statistics/TbILFS2199.XLSX>

<sup>38</sup> Analysis of Labour Force Survey data <https://www.nisra.gov.uk/system/files/statistics/TbILFS2199.XLSX>.

<sup>39</sup> Analysis of Labour Force Survey data <https://www.nisra.gov.uk/system/files/statistics/TbILFS2199.XLSX>.

<sup>40</sup> E.g., Age NI and COPNI (Pre-engagement consultation)

<sup>41</sup> Research in GB found that bus passes are often mainly taken up by those on low incomes, access to a car, rather than income, is found to be the critical factor in determining take-up.

<sup>42</sup> E.g., Age NI and COPNI (Pre-engagement consultation)

6.34. Alternatively, it could be argued that the proposal to increase the age of eligibility for concessionary fares helps address the increase in average cohort life expectancy projections. In this way it supports intergenerational fairness and helps make the concessionary fares scheme more sustainable for the future. This would ensure we continue to share the extra cost of rising longevity fairly between those contributing to, and those receiving, concessionary travel.

- **Limiting SmartPass use to off-peak travel only and/or Limiting SmartPass use to bus only travel**

6.35. The restriction of concessionary travel to off-peak or bus only may increase the barriers to travel for older people who need to travel at peak times.

6.36. A removal of peak travel may disadvantage older people in work, particularly those in low-income jobs, or those who travel for caring responsibilities or to early morning medical appointments.

6.37. Removal of the rail concession, in particular, may impact on older SmartPass users with mobility issues who use rail services because they are more accessible than bus.

- **Companion passes for disabled people, unable to travel alone**

6.38. Introducing free travel for companions can help address some of the issues faced by older people with a disability (e.g., those with mobility issues or cognitive challenges) and help remove barriers to using public transport.

### **Marital status**

6.39. There were 693,000 adults who were married or in a civil partnership in Census 2021. This made up 46% of our population aged 16 and over. In contrast 577,000 adults (38%) were single (never married/civil partnered).<sup>43</sup>

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<sup>43</sup> <https://www.nisra.gov.uk/statistics/2021-census/results> or use this link: - [Census 2021 Main statistics for Northern Ireland - Statistical bulletin - Marital or civil partnership status & Household relationships \(couples\) \(nisra.gov.uk\)](#)

- 6.40. Data is not held on the marital status of Concessionary Fares Scheme users and there is no evidence that there will be any differential impacts from the policy based on marital status. Additionally, engagement with stakeholders to date has not flagged up any negative impacts for this S75 group.
- 6.41. It is highly unlikely that the proposals will have a differential impact based on marital status. However, as part of the formal consultation process the Department intend to consult with a range of stakeholders and the general public to identify any potential equality impacts in relation to each of the S75 groups. This data will be analysed as part of the ongoing policy development process and the EQIA will be updated with any relevant information.

### **Sexual Orientation**

- 6.42. According to the 2021 Census, a total of 31,600 people aged 16 and over (or 2.1%) identified as LGB+ ('lesbian, gay, bisexual or other sexual orientation'), 1.364 million people (90.0%) identified as 'straight or heterosexual' and 119,000 people (7.9%) either did not answer the question or ticked 'prefer not to say'.<sup>44</sup>
- 6.43. Data is not held on the sexual orientation of Concessionary Fares Scheme users and there is no evidence that there will be any differential impacts from the policy based on sexual orientation. Additionally, engagement with stakeholders to date has not flagged up any negative impacts for this S75 group.
- 6.44. It is highly unlikely that the proposals will have a differential impact based on sexual orientation. However, as part of the formal consultation process the Department intend to consult with a range of stakeholders and the general public to identify any potential equality impacts in relation to each of the S75 groups. This data will be analysed as part of the ongoing policy development process and the EQIA will be updated with any relevant information.

### **Men and Women**

- 6.45. According to the NI Census, 2021, there are 967,047 females in Northern Ireland, equating to 51% of the population in Northern

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<sup>44</sup> <https://www.nisra.gov.uk/system/files/statistics/census-2021-main-statistics-for-northern-ireland-phase-3-statistical-bulletin-sexual-orientation.pdf>

Ireland, with 57,706 aged between 60-64, and 47,155 aged between 65-69 years of age. There are also 287,142 females aged 24 and under.<sup>45</sup>

- 6.46. According to the Travel Survey for NI In-depth Report 2017-2019, men aged 16+ made around the same proportion of their journeys by public transport (4%) as women aged 16+ (5%). Similarly, for the 16-29 and 30-59 age groups, men and women take a similar proportion of their journeys by public transport. However, women aged 60+ made a higher proportion of their journeys by public transport (6%), than men aged 60+ (3%).<sup>46</sup>
- 6.47. Data is not currently held on SmartPass holders by gender.

- **Raising Age eligibility**

- 6.48. Increasing age eligibility for concessionary fares means that, after the change is implemented, individuals will experience a decrease in both the number of years and the proportion of adult life they can expect to receive free public transport.
- 6.49. However, removing free travel from 60-64's and increasing the eligibility based on age to State Pension Age may have a greater negative equality impact on women from this group, in comparison to men, because they may have less to spend on public transport.
- 6.50. This is because women face economic disadvantage throughout their lives, in comparison to men. They have on average, poorer career progression, higher rates of casual, part-time, and low status work, and receive lower pay. Research has highlighted that the disadvantage is mainly caused by traditional family/care roles, exacerbated by poor availability of affordable childcare (especially in NI). All of this reduces women's ability to contribute to pension schemes and National Insurance payments.<sup>47</sup>

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<sup>45</sup> [Census 2021 population and household estimates for Northern Ireland: Statistical bulletin \(nisra.gov.uk\)](https://www.nisra.gov.uk)

<sup>46</sup> For further Information see Travel Survey for NI In-depth Report 2017-2019 (page 7): <https://www.infrastructure-ni.gov.uk/system/files/publications/infrastructure/tsni-in-depth-report-2017-2019.pdf>

<sup>47</sup> [Women's Economic Transition to Retirement \(niassembly.gov.uk\)](https://www.niassembly.gov.uk)

6.51. In 2022, the LFS<sup>48</sup> highlighted that in 2021 females earned 5.7 per cent less than males in NI. The largest gender pay gap across all age groups occurred in the 50 to 59 age group, where men earned almost £2.50 more per hour than women (£15.33 compared to £12.87), and equivalent to a 16.0 per cent pay gap. Older women are also more likely to leave employment earlier than men, between the ages of 63 and 64 for women compared to between 65 and 66 for men.<sup>49</sup>

6.52. Additionally, the Travel Survey for NI In-depth Report 2017-2019<sup>50</sup> shows that, in general, women aged 17+ are less likely to hold a full driving licence (74%) than men aged 17+ (83%). In addition, urban residents aged 17+ are less likely to hold a full driving licence (73%) than rural residents aged 17+ (86%). Women in urban areas, where SmartPass uptake tends to be higher, are less likely to hold a driving licence (68%) than women in rural areas (84%).

6.53. While not having a driving licence does not necessarily mean that women are unable to travel by car (they may have a partner, spouse or friend who they can travel with), it may mean that there are less travel options available to them.

- **Limiting SmartPass use to off-peak travel only and/or Limiting SmartPass use to bus only travel**

6.54. Research shows that men and women use public transport differently. According to a report by the United Nation, women “chain” their activities by combining multiple stops and destinations within a single, longer trip as a result of their household and caretaking responsibilities.<sup>51</sup> Restricting times and mode of travel may make these trips difficult and unaffordable, for those on low income. Additionally, women may be traveling with dependents or groceries, adding complications and inconvenience, if public transport isn’t affordable to use.

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<sup>48</sup> [Northern Ireland Labour Force Survey – Women in NI | Department for the Economy \(economy-ni.gov.uk\)](https://www.nisra.gov.uk/system/files/statistics/TblLFS2199.XLSX)

<sup>49</sup> 2022 Labour Force Survey annual summary - see <https://www.nisra.gov.uk/system/files/statistics/TblLFS2199.XLSX>

<sup>50</sup> [Travel Survey for Northern Ireland In-depth Report 2017-2019 \(infrastructure-ni.gov.uk\)](https://www.infrastat.gov.uk/infrastructure-ni.gov.uk) (see page 62 of report)

<sup>51</sup> For further information see: [5-13-add-building-safe-inclusive-cities-for-women.pdf \(stopstreetharassment.org\)](https://www.stopstreetharassment.org/)

## **Disability**

- 6.55. The 2021 Northern Ireland Census reported that one in four 24.3% of the population in Northern Ireland had a limiting long-term health problem or disability.<sup>52</sup>
- 6.56. 19% of respondents to the 2017-2019 Travel Survey for NI stated they had some difficulty with travel due to a physical disability or long-standing health problem. There was no real difference between males and females except in the 70+ age group: more women aged 70+ had difficulty with travel (49%) than men aged 70+ (35%).<sup>53</sup>
- 6.57. As expected, difficulty with travel due to a physical disability or long-standing health problem increases with age: 7% of 16–29-year-olds had difficulty with travel compared to 42% of those aged 70 and over.<sup>54</sup>
- 6.58. The NI Concessionary Fares Scheme currently provides full fare concessions to those registered blind and those in receipt of a war disablement pension. Half fare discounts are available to several other groups: eligible applicants registered as partially sighted; those registered with a learning disability; those who have had a driving licence refused or revoked on medical grounds; and those receiving the Mobility Component of Disability Living Allowance (DLA) or Personal Independence Payments (PIP).
- 6.59. In 2017, 1,910 people aged 0 to 64 were registered blind in Northern Ireland (national registration statistics were last updated in 2017).<sup>55</sup>
- 6.60. There were 3,612 War Pension Scheme (WPS) Recipients (Veterans (Disablement Pensioners)) in Northern Ireland as of 31 March 2018.<sup>56</sup>

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<sup>52</sup> [Census 2021 Main statistics for Northern Ireland - Statistical bulletin - Health \(nisra.gov.uk\)](https://www.nisra.gov.uk/publications/census-2021-main-statistics-for-northern-ireland-statistical-bulletin-health)

<sup>53</sup> TSNI In-depth Report 2017-2019 (page 8). See page 77 of the report for definition. Report available at: <https://www.infrastructure-ni.gov.uk/system/files/publications/infrastructure/tsni-in-depth-report-2017-2019.pdf>

<sup>54</sup> TSNI In-depth Report 2017-2019 (page 8). See page 77 of the report for definition. Report available at: <https://www.infrastructure-ni.gov.uk/system/files/publications/infrastructure/tsni-in-depth-report-2017-2019.pdf>

<sup>55</sup> Source: [Sight Loss Data Tool, RNIB](#)

<sup>56</sup> Sources: Compensation and Pension System; War Pension Computer System



6.61. There were 10,704 SmartPass Users in the overall half-fare entitlement category during 2018/19<sup>57</sup>:

**Table 3: Half-fare Users by subcategory**

Entitlement Category	Number
Half Fare – PIP (previously DLA)	9,084
Half Fare Learning Disability	1,115
Half Fare - No Driving Licence	340
Half Fare - Partially Sighted	165
<b>Total</b>	<b>10,704</b>

6.62. Figures for the number of people who have been refused a driving licence on medical grounds are not available. However, anecdotal evidence suggests that this number is likely to be in the hundreds rather than thousands.

6.63. During 2018/19, there were 10,704 Half-fare SmartPass Users which would suggest approximately 15% of the eligible population have a Half-fare SmartPass.

6.64. People with disabilities can face a range of barriers to accessing public transport. In 2023, the consumer group Transport for All noted that, with the cost-of-living crisis, many disabled people are finding the limited transport options available to them, are too expensive to use. This includes the public transport.<sup>58</sup>

6.65. Additionally, in Northern Ireland, some factors which may contribute to social exclusion, and which can be particularly prevalent are long-term unemployment and disability.

6.66. Statistics from the LFS in 2022, show there is a large difference in employment rates between people with a disability and

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<sup>57</sup> Based on DfI Management Information

<sup>58</sup> For further information see: [The cycle of transport poverty: how the cost-of-living crisis is locking disabled people indoors » Transport for All](#)

people without.<sup>59</sup> For example, in the 60-64 age group 67.7% of those without a disability were in employment, compared with 25.9% of those with a disability.

6.67. Women with a disability generally have a higher employment rate than disabled males across all age bands (the opposite to people without a disability), with the exception of 60-64 where the male rate is higher.

6.68. There also seems to be a difference around when employment rates start to drop off: for people with disabilities, the drop off is spread between the 50-54, 55-59, 60-64, and 65-69 age bands. Whereas for people without a disability, the drop off is larger between the 55-59, 60-64, and 65-69 age bands. The implication is that those who are disabled are retiring / leaving the workforce at an earlier age than those who are not disabled.<sup>60</sup>

- **Free travel for those currently receiving a half fare concession due to a qualifying disability**

6.69. Increasing the half-fare concession to full fare concessions for people with disabilities may remove barriers, such as financial costs, that prevent disabled people using public transport services to access social, employment and leisure opportunities.

6.70. Lower employment rates for disabled people remain a significant problem with transport constituting an important barrier to employment.<sup>61</sup>

6.71. Additionally, on average, disabled people have lower levels of private pension provision and are less likely to be in work in the period immediately preceding State Pension age than those without a disability<sup>62</sup>. Compared to the non-disabled population,

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<sup>59</sup> Based on analysis of Labour Force Survey Data (2022):

<https://www.nisra.gov.uk/system/files/statistics/TbLFS2199.XLSX>.

<sup>60</sup> Ibid: <https://www.nisra.gov.uk/system/files/statistics/TbLFS2199.XLSX>.

<sup>61</sup> In 2020 the employment rate for people with disabilities was 38.1%, the employment rate for people without disabilities was 80.3%. The employment rate of people with disabilities in NI is the lowest of the 4 countries within the UK and the disability employment gap is the largest. For the majority of the 2014 to 2020 period, NI had the lowest employment rates (people with and without disabilities) but the largest disability employment gap. See [Disability Employment Gap in Northern Ireland 2020 \(nisra.gov.uk\)](#)

<sup>62</sup> People with disabilities face huge barriers to pension saving resulting in a private pension pot of 36% of the UK average (£47980 compared to £130,928). See [underpensioned\\_index\\_2022\\_report.pdf \(nowpensions.com\)](#)

disabled people are also more likely to be in low-paid employment and have interrupted work records; they are also more likely to leave the labour market early<sup>63</sup>.

6.72. Therefore, increasing the level of concession from half fare to full fare has the potential to help people with disabilities access and stay in work, promoting good employment outcomes and independent living.

6.73. Under the current Scheme, there is also currently a distinction between those who are partially sighted (who receive a half-fare concession) and those who are registered blind (who receive a full fare concession). The majority of visually impaired people are unable to drive however both receive different discounts under the Scheme, which on the face of it, would appear to be unfair.

- **Companion passes for disabled people, unable to travel alone**

6.74. Introducing free travel for companions can help address some of the issues faced by eligible disabled people (those who are unable to travel alone) and help remove barriers to using public transport that they face.

6.75. This could include helping them access health and other appointments, services, amenities and educational or training opportunities; or enable them to make more regular visits to family and friends, promoting their overall health and well-being.

- **Extend the qualifying criteria for a Half Fare SmartPass in line with other UK jurisdictions**

6.76. Extending the Scheme to include a broader category of people with disabilities could have a positive quality impact on some disabled people who are currently not eligible to apply for the Scheme, such as those who are profoundly or severely deaf, those without speech, or those who are in receipt of the higher or medium rate care component of Disability Living Allowance (DLA)/PIP.

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<sup>63</sup> The NISRA Labour Force Survey 2022 estimates showed that by age 60-64, only 25.9% of people with disabilities were in employment compared to 67.7% of people without disabilities. By age 65-69, this number fell to 9.4% and 35.5% respectively. See [Coronavirus and its impact on the Labour Force Survey - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk/coronavirus-and-its-impact-on-the-labour-force-survey)

- **Limiting SmartPass use to off-peak travel only and/or Limiting SmartPass use to bus only travel**

6.77. A removal of peak travel may disadvantage disabled people in work, impacting on their employment opportunities and economic participation. This is particularly important given that research by ECNI has highlighted that people with disabilities already face lower levels of employment and lower average earnings than their non-disabled counterparts.<sup>64</sup>

6.78. Removal of the rail concession, in particular, may impact on concessionary fare users with disabilities who use rail services because they are more accessible than bus e.g., those with large wheelchairs and scooters or whose disability makes accessing certain services (e.g., Goldline) more difficult.

- **Raising Age Eligibility**

6.79. Additionally, although some disabled people may qualify for the Scheme, not all disabled people are eligible. This means that raising the age eligibility may negatively impact on some older disabled people who do not qualify for the Scheme on disability grounds.

6.80. Disabled people have lower levels of private pension provision and are less likely to be economically active than non-disabled people therefore, this change may, in particular, impact on older disabled people as on average, their income is lower than people without a disability.

### **Dependents**

6.81. Young people up to the age of 16 receive half fare concession under the Scheme (children under five already receive free travel without reimbursement). In addition, Translink offer a yLink card which provides 50% off the cost of travel for young people between 16 and 23.

6.82. Although data specific to people with dependents (and those without) is not held in relation to Scheme, anecdotal evidence from those representing people with disabilities, has highlighted

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<sup>64</sup> For further information see: [ECNI - Key Inequalities in Employment in Northern Ireland - Research and statement \(equalityni.org\)](https://www.equalityni.org/ECNI-Key-Inequalities-in-Employment-in-Northern-Ireland-Research-and-statement)

that those with disabled dependents (who cannot travel alone) are likely to benefit from companion travel if introduced.

- 6.83. It is expected that providing free companion travel changes will have a positive impact on parents or carers. This is because money that may have been used on public transport, can be used elsewhere.

### **Multiple Identity**

- 6.84. With regards to the proposed policy changes, it is highly likely that some impacted people will fall into multiple Section 75 categories.
- 6.85. For example, the removal of rail travel may negatively impact on disabled older people. However, easier access to the Scheme for minority ethnic communities could mean that some disabled minority ethnic people could access the Scheme quicker and easier under a number of proposals.
- 6.86. The impact of the policy proposals on people with multiple identities has been explored and is discussed in more detail in the sections above regarding particular Section 75 Groups.

## **7. Impact on Good relations**

### **Religious Belief**

- 7.1. A number of the proposed changes promote free travel for a number of sector 75 groups which may allow for greater mixing between individuals and communities. As a high number of existing SmartPass holders report using their pass to visit family and friends<sup>65</sup>, there is also a potential residual impact of the plans on good relations. Further opportunities to better promote good relations may be identified as part of the public consultation exercise.

### **Political Opinion**

- 7.2. A number of the proposed changes promote free travel for a number of sector 75 groups which may allow for greater mixing between individuals and communities. As a high number of

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<sup>65</sup> NI Concessionary Travel Scheme: Survey Analysis: See <https://www.infrastructure-ni.gov.uk/sites/default/files/publications/infrastructure/concessionary-fares-survey-report.pdf>

existing SmartPass holders report using their pass to visit family and friends, there is also a potential residual impact of the plans on good relations. Further opportunities to better promote good relations may be identified as part of the public consultation exercise.

### **Racial Group**

- 7.3. Some changes do promote free travel for a number of sector 75 groups which may allow for greater mixing between individuals and communities. The introduction of free public transport for asylum seekers can provide asylum seekers with an opportunity to integrate into society and may, therefore, positively impact on good relations between people of different racial groups.

## **8. Consideration of Mitigations/Alternatives**

- 8.1. The EQIA process requires that, if it is decided that the policy may have an adverse impact on people in one or more of the Section 75 groups, then the authority must consider alternative policies and measures which might mitigate the adverse impact.
- 8.2. While the Department recognises that raising the age eligibility for concessionary fares may have an adverse impact for those who are directly affected (particularly people aged 60-64 on low incomes and those who are geographically isolated), it also considers that the increase is justified. This is because the Scheme is not financially sustainable in its current format.
- 8.3. Nevertheless, a number of mitigations in relation to the eligibility proposals on age have already been identified. These include applying the new age eligibility criteria to new applicants only or introducing the new age criteria gradually.
- 8.4. A mitigation has also been identified in relation to the proposal regarding peak time travel (i.e., that this should not apply to people with disabilities).
- 8.5. Consideration will also be given to how to best meet the needs of S75 users in communicating any changes to the Scheme, such as ensuring the application process is provided in accessible formats and advertising the changes in a range of formats and languages.

- 8.6. Throughout the consultation process on the draft EQIA, the Department will be engaging with stakeholders on an ongoing basis to identify any potential mitigations that can be made to lessen the negative impact of the proposals or to better promote equality of opportunity and good relations.
- 8.7. Further mitigations may also be identified as part of the consultation process and will be considered during the policy development process.

## **9. Formal Consultation**

- 9.1. This Draft EQIA is being consulted on as part of the consultation on the Northern Ireland Concessionary Fares Scheme. The full consultation document can be found on the Department's website.
- 9.2. The Department for Infrastructure is keen to hear feedback from as many people as possible on both the consultation document and the Draft EQIA. This particularly applies to those who will be affected by the changes, including older or disabled people, as well as those identifying with specific Section 75 groups.
- 9.3. The Department will use your feedback to enhance the effectiveness of policy development by gathering your views on impacts and mitigation measures.
- 9.4. The Department also intends to build on the extensive engagement already carried out to date on the review of the NI Concessionary Fares Scheme. We will be engaging with stakeholders throughout the consultation process on the draft EQIA on an ongoing basis, to identify any potential mitigations that can be made to lessen the negative impact of the proposals or to better promote equality of opportunity and good relations.
- 9.5. The best way to respond to this draft EQIA is using our online Citizenspace survey on the Department's website. However, you can also tell us your views by e-mailing your response to: [NIConcessionaryfaresconsultation@infrastructure-ni.gov.uk](mailto:NIConcessionaryfaresconsultation@infrastructure-ni.gov.uk)
- 9.6. In particular, we would like you to tell us what you think about:

- the impacts we have identified, including whether you feel there are any impacts we have not identified;
- the mitigations we have suggested to reduce the potential adverse impact of the proposals including any new mitigations;
- information (including any new data or research) which you think would help inform our proposals.

9.7. You can also write to us at:

NI Concessionary Fares Scheme Consultation  
Public Transport Policy Division  
Room G23  
Clarence Court  
10-18 Adelaide Street  
Belfast  
BT2 8GB

**Phone: 02890542977**

- 9.8. Consultation responses should be submitted no later than **5pm on 24 August 2023**.
- 9.9. If you require an alternative version of this draft EQIA, please contact us to discuss your requirements.

## **10. Decision and publication of the EQIA results**

- 10.1. Following consultation on the draft EQIA and review of the NI Concessionary Fares Scheme, the Department of Infrastructure will consider the evidence and information provided, as well as any proposed mitigations, and revise and finalise this documentation where appropriate.
- 10.2. This will enable the EQIA to be updated considering evidence presented during the consultation as to its impact and ability to promote equality of opportunity.
- 10.3. The Department will publish the final EQIA alongside the final decision on the proposals on its website. The issues raised during consultation on the draft EQIA, and review of the NI



Concessionary Fares Scheme will also be reflected in a summary of consultation responses document.

## **11. Next steps**

- 11.1. Following the closing date, all responses to the draft EQIA and consultation document will be analysed and considered along with other available evidence to inform recommendations from our ongoing review of the Scheme.
- 11.2. It will then be up to the Minister (or should there continue to be an absence of Ministers in the NI Executive, the relevant decision maker<sup>66</sup>) to consider the outcome of the Review. They will then decide how many of the proposals to act on, how to do this, and the timing of any changes. In deciding what changes to introduce and when, the decision maker will consider the impact of any changes on the financial sustainability of the Scheme.
- 11.3. If any of the changes are implemented, it is likely that we would do this in stages.

## **12. Monitoring for adverse impacts**

- 12.1. In keeping with this Department's commitments under its Equality Scheme, any adverse differential impact on equality of opportunity or good relations that may be identified through this consultation process will be considered in informing the Department's final decisions. Any such findings will be used to inform further development of mitigations and/or policy decisions.
- 12.2. Once the policy has been implemented, it will remain under review. Impacts will be monitored, and consideration will be given to the policies effect on Section 75 groups.

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<sup>66</sup> Taking into account the decision-making framework set out in the Northern Ireland (Executive Formation etc.) Act 2022 or relevant legislation in place at the time

## 13. Annex A - Data and Research

13.1. This EQIA uses a mixture of qualitative and quantitative data from a number of sources, including:

### Quantitative:

- [2021 Census | Northern Ireland Statistics and Research Agency \(nisra.gov.uk\)](https://www.nisra.gov.uk)
- [Translink \(https://www.translink.co.uk/\)](https://www.translink.co.uk/)
- [NISRA 2020-based interim population projections and mid-year 2020 population estimates](#)
- [Northern Ireland transport statistics | Department for Infrastructure \(infrastructure-ni.gov.uk\)](https://www.infrastructure-ni.gov.uk)
- [Northern Ireland Concessionary Fares Scheme - 2019 Survey Analysis \(infrastructure-ni.gov.uk\)](https://www.infrastructure-ni.gov.uk)
- [Travel Survey for Northern Ireland | Northern Ireland Statistics and Research Agency \(nisra.gov.uk\)](https://www.nisra.gov.uk)
- [Annual Survey of Hours and Earnings | Northern Ireland Statistics and Research Agency \(nisra.gov.uk\)](https://www.nisra.gov.uk)
- [DfI Driver, Vehicle, Operator, and Enforcement Statistics - 2022-23 - Quarter Two | Department for Infrastructure \(infrastructure-ni.gov.uk\)](https://www.infrastructure-ni.gov.uk)
- 2022 Labour Force Survey annual summary <https://www.nisra.gov.uk/system/files/statistics/TbILFS2199.XLSX>
- [Voluntary Org/Department for Infrastructure focus groups](#)
- [Concessionary Fare data obtained from Translink](#)
- [The Joseph Rowntree Foundation UK Poverty 2018 | JRF](#)
- [Sight Loss Data Tool, RNIB](#)
- [Data shared by the NI Executive Office](#)
- [Data shared by Mears Housing](#)
- [Concessionary Fare data obtained from Translink](#)

### Qualitative:

- [Children's Law Centre and South Tyrone Empowerment Programme \(2022\): Joint Submission to FCNM Advisory Committee Rights - Rights of Asylum Seeker Children Living in Contingency Accommodation \(Hotel Buildings\) in NI, run by Mears Group PLC Joint Submission - Asylum Seeker Children in Contingency Accommodation - April 2022 \(1\).pdf](#)

- [The Experiences of Minority Ethnic and Migrant People in Northern Ireland - Northern Ireland Affairs Committee \(parliament.uk\)](#)
- [Joint Committee on Human Rights \(2008\): The Treatment of Asylum Seekers Microsoft Word - AS Report Vol. 1 CRC nw.doc \(parliament.uk\)](#)
- [Asylum seekers' and refugee's experiences of Life in Northern Ireland: Report of the first study on the situation of asylum seekers and refugees in NI - 2016 — Queen's University Belfast \(qub.ac.uk\)](#)
- [Mears/Department for Infrastructure focus groups](#)
- [Voluntary Org/Department for Infrastructure focus groups](#)
- [Social Inclusion | Poverty Eradication \(un.org\)](#)
- [Social Inclusion: Origins, concepts, and key themes \(researchgate.net\)](#)
- [The Benefits of a policy of free bus travel for older people \(researchgate.net\)](#)
- [Public transport policy, social engagement, and mental health in older age: a quasi-experimental evaluation of free bus passes in England - PubMed \(nih.gov\)](#)
- [The Impact of a Free Older Persons' Bus Pass on Active Travel and Regular Walking in England - PMC \(nih.gov\)](#)
- [The relationship between transport and loneliness - Sustrans.org.uk](#)
- [British Library EThOS: Just the ticket? : exploring the contribution of free bus fares policy to quality of later life \(bl.uk\)](#)
- [The Costs and Benefits of Concessionary Bus Travel for Older and Disabled People in Britain Concessionary travel costs and benefits](#)
- [Evaluation of concessionary bus travel: the impacts of the free bus pass \(publishing.service.gov.uk\)](#)
- [AGE NI Lived Experience 2021   
 https://www.ageuk.org.uk/globalassets/age-ni/media/lived-experience-2021.pdf](#)
- [Fair bus fares for young people \(sustrans.org.uk\)](#)
- [Young Persons' Free Bus Travel Scheme – Baseline Data Report \(transport.gov.scot\)](#)
- [Transport and Poverty: a review \(ucl.ac.uk\)](#)
- [The case for the Urban Bus, Abrantes et al 2010](#)
- [Northern Ireland Labour Force Survey – Women in NI | Department for the Economy \(economy-ni.gov.uk\)](#)

- The UK Womens Budget Group 2018 [transport-October-2018-w-cover.pdf \(wbg.org.uk\)](#)
- [UK Disability Survey research report, June 2021 - GOV.UK \(www.gov.uk\)](#)
- [\(PDF\) Social exclusion, accessibility, and lone parents \(researchgate.net\)](#)
- [Social Inclusion | Poverty Eradication \(un.org\)](#)
- [\(PDF\) Social Inclusion: Origins, concepts, and key themes \(researchgate.net\)](#)
- [Transport and social exclusion: investigating the possibility of promoting inclusion through virtual mobility - ScienceDirect](#)
- [Scope's 2017 to 2019 impact report | Disability charity Scope UK](#)
- The Costs and Benefits of Concessionary Bus Travel for Older and Disabled People in Britain [Microsoft Word - 4. Concessionary travel costs and benefits\\_170404\\_v3\\_GW.docx \(cpt-uk.org\)](#)
- [Evaluation of concessionary bus travel: the impacts of the free bus pass \(publishing.service.gov.uk\)](#)
- Voluntary Org/Department for Infrastructure focus groups
- IMTAC/Department for Infrastructure focus groups
- Equality Commission/Department for Infrastructure focus groups
- [\(PDF\) Social exclusion, accessibility, and lone parents \(researchgate.net\)](#)
- [Tess Ridge \(2002\), Childhood Poverty and Social Exclusion, Bristol: Policy Press, | Journal of Social Policy | Cambridge Core](#)
- The Law Centre NI: Response to Home Office Review: Asylum Support rates [2018Response\\_AsylumSupportRates\\_Aug.pdf \(lawcentreni.org\)](#)

