



Consortium for the Regional Support for Women in Disadvantaged and Rural Areas

Response to: Consultation on free and discounted fares on public transport (concessionary fares)

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Foyle Women's
Information
Network



Women's Regional Consortium: Working to Support Women in Rural Communities and Disadvantaged Urban Areas

1. Introduction

1.1 This response has been undertaken collaboratively by the members of the Consortium for the Regional Support for Women in Disadvantaged and Rural Areas (hereafter, either the Women's Regional Consortium or simply the Consortium), which is funded by the Department for Communities and the Department of Agriculture, Environment and Rural Affairs.

1.2 The Women's Regional Consortium consists of seven established women's sector organisations that are committed to working in partnership with each other, government, statutory organisations and women's organisations, centres and groups in disadvantaged and rural areas, to ensure that organisations working for women are given the best possible support in the work they do in tackling disadvantage and social exclusion.¹ The seven groups are as follows:

- ♀ Training for Women Network (TWN) – Project lead
- ♀ Women's Resource and Development Agency (WRDA)
- ♀ Women's Support Network (WSN)
- ♀ Northern Ireland's Rural Women's Network (NIRWN)
- ♀ Women's TEC
- ♀ Women's Centre Derry
- ♀ Foyle Women's Information Network (FWIN)

¹ Sections 1.2-1.3 represent the official description of the Consortium's work, as agreed and authored by its seven partner organisation

1.3 The Consortium is the established link and strategic partner between government and statutory agencies and women in disadvantaged and rural areas, including all groups, centres and organisations delivering essential frontline services, advice and support. The Consortium ensures that there is a continuous two-way flow of information between government and the sector. It also ensures that organisations/centres and groups are made aware of consultations, government planning and policy implementation. In turn, the Consortium ascertains the views, needs and aspirations of women in disadvantaged and rural areas and takes these views forward to influence policy development and future government planning, which ultimately results in the empowerment of local women in disadvantaged and rurally isolated communities.

1.4 The Women's Regional Consortium appreciates the opportunity to respond to the Department for Infrastructure (DfI) Consultation on free and discounted fares on public transport (concessionary fares).

1.5 We understand that the proposed cuts outlined in the EQIA are due to the constrained budget that has been imposed by the Secretary of State. We are aware that civil servants are in the unenviable position of having to make these difficult decisions with no Ministers in place. Nevertheless, we would be concerned if some of the proposals outlined in this consultation document were to go ahead. We believe that these would impact on the most vulnerable including those on the lowest incomes many of whom will be women.

1.6 We wish to endorse the responses made by the Women's Policy Group (WPG) of which the Women's Regional Consortium is a member. We also wish to endorse the response made by the Community Transport Association (CTA) which raises a range of important considerations particularly in relation to rural people and gender. The Women's Regional Consortium also endorses the following statement prepared by the NI Womens Budget Group and Ulster University:

It is important to acknowledge that the current budget process is particularly abnormal, and we understand that the budget allocations delivered by the Secretary of State are not only highly restrictive but put undue pressure on officials to make decisions they should not have to make. The abnormality of this budget cycle also means that planning procedures that occur during a typical budget process have not taken place. Without the fulfilment of these procedures, the equality screening and impact assessment consultation comes too late in the process and is inadequate for full consideration of the impact of these spending decisions on women.

Gender Budgeting requires government departments to analyse the different impact of a budget on people of different genders, starting as early in the budget cycle as possible. The aim of gender budgeting is to ensure that the distribution of resources creates more gender equal outcomes. Over time, gender analysis should become embedded at all stages of the budget process. Women's intersecting identities are also included in this analysis and policy-makers are expected to promote these areas of equality as well.

There is widespread political support for gender budgeting in Northern Ireland and a growing evidence base that it can help create a more equal society. In the current budget crisis women will experience particular disadvantages due to the pre-existing socio-economic conditions. For example, there is strong evidence that women have suffered disproportionately from over a decade of Westminster austerity measures, the pandemic, and the cost-of-living crisis². We cannot afford to continue making decisions at the expense of women and risk further degradations to gender equality and additional intersecting equalities as well.

Not only is there an immediate need for gender budgeting in our current crisis, but the benefits would help to improve the budgetary process. Gender budgeting is good

² MacDonald, E.M. (2018) The gendered impact of austerity: Cuts are widening the poverty gap between women and men. British Politics and Policy at LSE. <https://blogs.lse.ac.uk/politicsandpolicy/gendered-impacts-of-austerity-cuts/>

Charlton, E. (2023) This is Why Women are Bearing the Brunt of the Cost of Living Crisis According to Research. World Economic Forum. <https://www.weforum.org/agenda/2023/01/cost-of-living-crisis-women-gender-gap/>

budgeting; it encourages greater transparency of government processes, more in-depth assessments of how policies and budgets affect constituents and closer cooperation between governmental and non-governmental stakeholders. It encourages a more targeted approach to the spending of public money, which will improve policy outcomes. Implementing gender budgeting mechanisms would provide decision-makers with the tools to recognise and mitigate gendered economic impacts and promote gender equality. Whilst political crises that affect budget processes are outside the control of departmental officials, strategically embedding gender budgeting measures will create a firewall to prevent such disproportionate disadvantages in future.

We recognise that the current equality screening and impact assessment duties under Section 75 provide policy infrastructure that could be used to progress gender budgeting. The EQIA process allows space to identify budget impacts on women and opportunities to promote more gender equal outcomes. However, too often the analysis included in these documents focuses only on equal treatment or stops at the point of acknowledging pre-existing inequalities. For gender budgeting to be fully implemented, the next stage must be to reformulate budgets and budgetary policy with targeted measures to improve outcomes for women and girls. Additionally, Section 75 screening and impact assessment typically takes places at the very end of the budget planning process or after the budget has been finalised. The OECD³ highlights that best practice for gender budgeting is to embed it at all levels of policy- and budget-making: planning, formulation, approval, implementation, monitoring and reformulation. It is crucial that gender equality obligations are not a ‘tick-box exercise,’ but rather that gender equality is mainstreamed in every area of the budgetary process through gender analysis of data supported by experts from civil society.

³ OECD (2023), OECD Best Practices for Gender Budgeting, *OECD Journal on Budgeting*, vol. 23/1, <https://doi.org/10.1787/9574ed6f-en>.

2.0 General Comments

We make the following general comments in relation to this consultation:

- The Women's Regional Consortium believes that some of the proposals outlined in the consultation will have significant adverse impacts for women and will hit women on the lowest incomes the hardest. We believe that it will have considerable impacts for women particularly rural women, disabled women and women with caring responsibilities.
- We are strongly opposed to any proposals that cut provision for those on the lowest incomes particularly during a Cost-of-Living Crisis where these households are struggling the most.⁴
- Research by the Women's Regional Consortium on the impact of the Cost-of-Living Crisis on women⁵ has shown the following in relation to transport costs:
 - 28% of the women reported that increases in the cost of transport had a big impact on their household budget;
 - 38% reported that they were finding it difficult to pay travel costs;
 - 49% reported that they had reduced the use of their car/public transport to try and cope with cost of living increases;
 - 53% said that cheaper public transport/help with fuel costs would help them to cope with cost of living rises better.
- The consultation's EQIA highlights a number of areas which mean that women would be more likely to be impacted by the proposals to raise the age eligibility for the SmartPass:
 - Women aged 60+ made a higher proportion of their journeys by public transport (6%) than men aged 60+ (3%) (Travel Survey for NI)

⁴ <https://www.jrf.org.uk/report/going-under-and-without-jrfs-cost-living-tracker-winter-202223>

⁵ Women's Experiences of the Cost-of-Living Crisis in Northern Ireland, Women's Regional Consortium, June 2023

<https://www.womensregionalconsortiumni.org.uk/wp-content/uploads/2023/06/Womens-Experiences-of-the-Cost-of-Living-Crisis-in-NI-2.pdf>

- Women may have less to spend on public transport 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. (Women's Economic Transition to Retirement, NI Assembly)
- Females earned 5.7% less than males in NI and 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. (NI Labour Force Survey)
- Women aged 17+ are less likely to hold a full driving licence (74%) than men aged 17+ (83%) leaving less travel options open to them. (Travel Survey for NI)
- 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. 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.
- Age NI have highlighted in their response to this consultation that research indicates that the groups most at risk of being in poverty in retirement are single women, people living alone, people who are amongst the oldest age group (85+), people who are from BAME communities, people who rent private or social housing, people with a disability, people with caring

responsibilities and those who are self-employed. Older people live on a fixed income, with no scope to source an additional or new income.

- The gendered nature of care means that women are more likely to provide care both in terms of childcare and in terms of unpaid care for family members. Statistics show that in Northern Ireland 65% of adult carers were female compared to 35% male.⁶
- Figures from the Carer Poverty Commission show that 25% of carers in Northern Ireland are living in poverty, significantly more than the non-carer population (16%) and higher than the poverty rate for carers in the rest of the UK (23%).⁷
- Access to flexible, affordable childcare has been a major issue in Northern Ireland which remains the only region without a Childcare Strategy despite being a New Decade, New Approach Agreement priority. This places huge pressure on families and results in many grandparents having to provide childcare to enable their own children to work. In many cases this falls to women who often bear the burden of school drop-offs and collections some of whom would be impacted by restricting eligibility for the SmartPass.
- Women are also more likely to be responsible for household budgets and for grocery shopping.
- We believe that rural women are likely to be adversely impacted by these proposals which is highlighted by our Consortium partner's the Northern Ireland Rural Women's Network (NIRWN): *"Women are much less likely to have access to their own private transport than men. This means that women depend much more on public transport, and are at an economic disadvantage to men. The accessibility of education, training, work and childcare provision and the cost of public transport are factors in determining women's participation, especially in rural areas. The economic disadvantages of lack of*

⁶ Family Resources Survey 2019/20, Department for Communities, November 2021
[The Family Resources Survey for Northern Ireland 2019-2020 \(communities-ni.gov.uk\)](https://communities-ni.gov.uk)

⁷ The experiences of poverty among unpaid carers in Northern Ireland, the Carer Poverty Commission NI, August 2023
[the-experiences-of-poverty-among-unpaid-carers-in-northern-ireland.pdf \(carersuk.org\)](https://carersuk.org)

access to transport are compounded by the impeded ability to access basic services and social isolation. Feedback from NIRWN members clearly indicates that transport provision varies greatly across the region depending upon where you live, and often provision is linked to the school terms, resulting in no service during holidays.”⁸

- Community Transport Association figures suggest that these proposals would have significant impacts on rural women – 93% of Dial-a-Lift journeys are made using a SmartPass and almost 70% of DAL journeys are taken by women.
- The consultation document acknowledges that the Concessionary Fare Scheme has additional indirect benefits: *“Free and discounted travel also benefits the wider community by enabling older and disabled people to volunteer, stay involved in church or charity work, help with childcare, or visit friends and family. Greater involvement and participation in the local community, in turn, has the potential to generate benefits for the concessionary passholder, reducing social isolation, increasing independence, and promoting good health outcomes. While these benefits are difficult to quantify, it is clear that the Scheme makes a significant contribution to people’s lives here, as well as contributing to government’s wider social, economic, environmental, and public health goals.”* By reducing eligibility to this Scheme as proposed in this consultation it would create a range of negative outcomes not only for the people impacted but for the wider community and economy. This could include increases in loneliness, poor mental health and a loss of money from local shops and businesses as older people may not be able to travel to socialise, visit family and friends and shop.
- A 2019 Survey on the Concessionary Fares Scheme by the Department⁹ found that 88% agreed that having a SmartPass increased their usage of

⁸ Northern Ireland Rural Women’s Network, Rural Women’s Manifesto, <https://www.nirwn.org/wp-content/uploads/2016/12/NIRWN-Rural-Womens-Manifesto.pdf> p.2

⁹ <https://www.infrastructure-ni.gov.uk/sites/default/files/publications/infrastructure/concessionary-fares-survey-report.pdf>

public transport, 86% said it enabled them to be more active, 86% said it allowed them to afford more as public transport is cheaper/free and 85% said it enabled them to make more social visits. Respondents used their SmartPass to travel for shopping trips (67%), social visits (67%), and to attend hospital appointments or visits (58%). This data very clear shows the need for the SmartPass and the many benefits that it brings for users in terms of health, financial wellbeing, connectedness and inclusion.

- Increasing isolation is an obvious risk arising from these proposals especially for older people who are less likely to drive. This is even more of an issue in rural areas. This is likely to increase poor health outcomes which will increase pressure on the an already overburdened health service.
- There are likely to be cumulative impacts as a result of restricting eligibility to this Scheme. Cuts to Concessionary Fares will limit opportunities for older people on low incomes to access employment, volunteering opportunities, education, social activities, services including health services and opportunities for socialising. This could impact on employment levels, increase isolation which could impact on the health service and reduce the amount of money spent in local shops and businesses which could impact on local economies especially in rural areas.
- The consultation document acknowledges that we have an ageing population which is set to increase from 22.6% to 28.8% in 2035. The consultation lists the many benefits of the scheme enabling many older people to live active, healthy, and independent lives, and participate more fully in the community, for example, through volunteering, continuing to work or providing childcare. Increased participation in society helps improve equality of opportunity and active ageing for older people. These are all important benefits of the scheme not only to the older people themselves but to wider communities and the economy and this is vitally important as the population ages.

- The restriction of eligibility and resulting reduction in SmartPass journeys will also have implications for the environment. If more people are unable to use public transport and choose to travel by car this would have a negative impact on the environment and increase congestion. This would be contrary to the Department's objective of increasing the number of people using public transport to reduce carbon emissions as is acknowledged by the consultation document (paragraph 2.24). In order to help meet our climate change obligations it is important that every action is taken to encourage people to use public transport where possible.

3.0 Specific Comments

Question 1: Do you think changes should be made to the age eligibility for the Scheme?

- ☐ Yes
- ☒ No

Question 2: If the Department was to introduce changes to the age eligibility, which is your preferred option? (Select one answer)

- ☐ Increase age eligibility to 65 and apply this change to existing 60+ SmartPass users and new applicants
- ☐ Increase age eligibility to 65 and apply this change to new applicants only
- ☐ Increase age eligibility to State Pension Age and apply this change to existing 60+ SmartPass users and new applicants
- ☐ Increase age eligibility to State Pension Age and apply this change to new applicants only

We have not selected an answer to this question as it is our view that the eligibility for the Scheme should remain as it is. We urge caution in the way these questions are posed

and analysed. If a consultee chooses a particular option but has qualifying details around why they have chosen this option, then their answer cannot be taken independently from this additional information.

In our view, the least harmful option would be to increase the age eligibility to 65 and apply this change to new applicants only. However, as the accompanying EQIA outlines the proposals *“have the potential to have an adverse impact on people’s economic, social, and cultural life as well as to exacerbate health inequalities for S75 users and impact on wider economic growth.”* It goes on to detail the Section 75 groups most likely to be impacted – age, gender, age and people with a disability, people with dependents.

We believe there would be considerable negative impacts for women if any of these proposals were introduced – please see Section 2.0 for full details on how women are likely to be more adversely affected by these proposals.

Question 3: If you already hold a 60+ SmartPass but in future were not able to use it, how would you make your journeys the majority of the time? (Select one answer)

☒ Other – please specify:

We are responding as an organisation not an individual.

Question 4: If you wish to provide comments supporting your answers, please do so below.

While we are responding as an organisation not an individual, we believe that making this change would have significant impacts for those currently holding a SmartPass, most particularly for those on the lowest incomes. The impact of the Cost-of-Living Crisis has meant many people struggling to make ends meet on low incomes through social security benefits or in low-paid work. They have seen the costs of the most essential items rise significantly without this being reflected in either wages or the level of benefits they receive. It is likely therefore that any change to the SmartPass eligibility would have a

significant impact on those on the lowest incomes and particularly for women who the consultation has identified have lower rates of employment and are less likely to hold a driving licence than men (paragraph 2.23). This would limit their ability to access training or education, work, provide care and enable possibilities for social interaction. In the long-term this could lead to increased social isolation, loneliness and poor health particularly mental health.

Question 5: Do you think SmartPass users who hold an age-related SmartPass (60+ or Senior (65+)) should be able to use their SmartPass before 09:30?

☒ Yes

☐ No

Question 6: Do you think SmartPass users who hold a disability-related SmartPass should be able to use their SmartPass before 09:30?

☒ Yes

☐ No

Question 7: If you hold a SmartPass and could not use it before 09:30 on a weekday, how would you make your journeys the majority of the time? (Select one)

☒ Other – please specify:

We are responding as an organisation not an individual.

Question 8: If you wish to provide comments supporting your answers, please do so below.

While we are responding as an organisation not an individual, we believe that restricting the times during which a SmartPass can be used will have implications for those using their pass to access work. As outlined in paragraph 2.19 of the consultation document many older people are staying in the workforce longer and many of the people who receive free public transport are still working (61.5% of males and 44% of females aged 60-64 were employed). Therefore, restricting the hours during which the SmartPass can be used will have adverse impacts for those working particularly those on the lowest incomes.

We also suggest that restricting times of use could have adverse impacts for those older people who provide childcare for grandchildren/other relatives (particularly in relation to school drop-offs). This informal childcare is vitally important enabling families to take up and stay in employment and even more so now in this Cost-of-Living Crisis where formal childcare may be unavailable or too expensive. Employers for Childcare figures show that 55% of families use grandparents to provide some or all of their childcare and it is the most popular form of childcare in Northern Ireland.¹⁰ Once again, we believe that restricting the hours during which the SmartPass can be used would have adverse impacts for those on the lowest incomes and those most likely to be providing childcare which often falls to women.

Question 9: Do you think SmartPass users who hold an age-related SmartPass (60+ or Senior (65+)) should be able to use their pass on rail?

☒ Yes

☐ No

¹⁰ Northern Ireland Childcare Survey 2021, Employers for Childcare, November 2021
<https://www.employersforchildcare.org/report/northern-ireland-childcare-survey-2021/>

Question 10: Do you think SmartPass users who hold a disability-related SmartPass should be able to use their pass on rail?

☒ Yes

☐ No

Question 11: If you hold a SmartPass and could not use it on rail, how would you make your journeys the majority of the time? (Select one answer)

☒ Other – please specify:

We are responding as an organisation not an individual.

Question 12: If you wish to provide comments supporting your answers, please do so below.

While we are responding as an organisation not an individual, we believe that removing eligibility for rail travel places unnecessary restrictions on those who are better served by train services and that this is arbitrarily unfair. Train services may also be better placed in terms of accessibility for those who hold a Disabled Person's SmartPass particularly where there are mobility aids and placing these restrictions on rail travel could therefore adversely impact the people the Scheme is intended to help.

Question 13: Do you think that the Department should introduce a fee for a SmartPass?

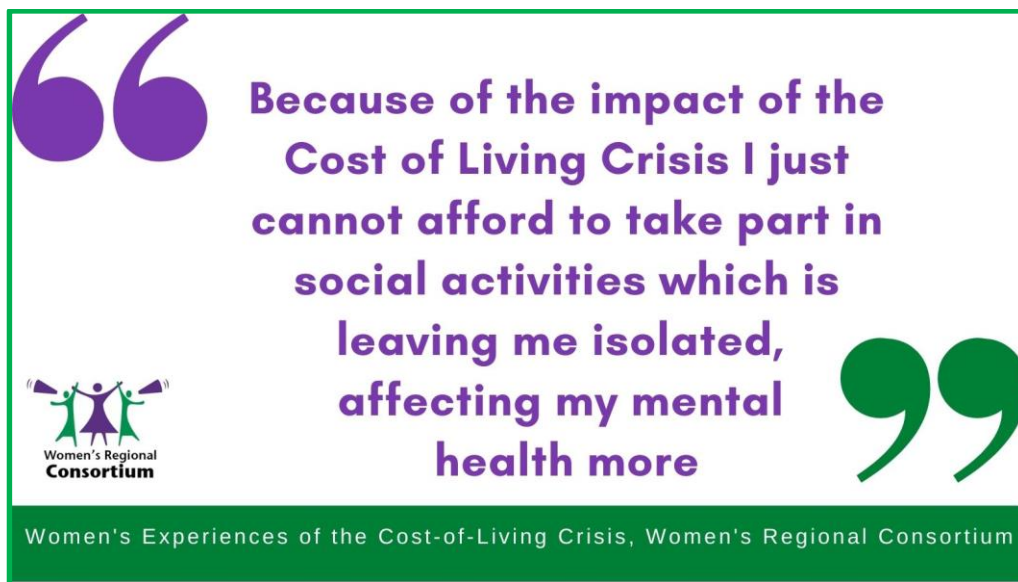
☒ Yes **(but with exceptions)**

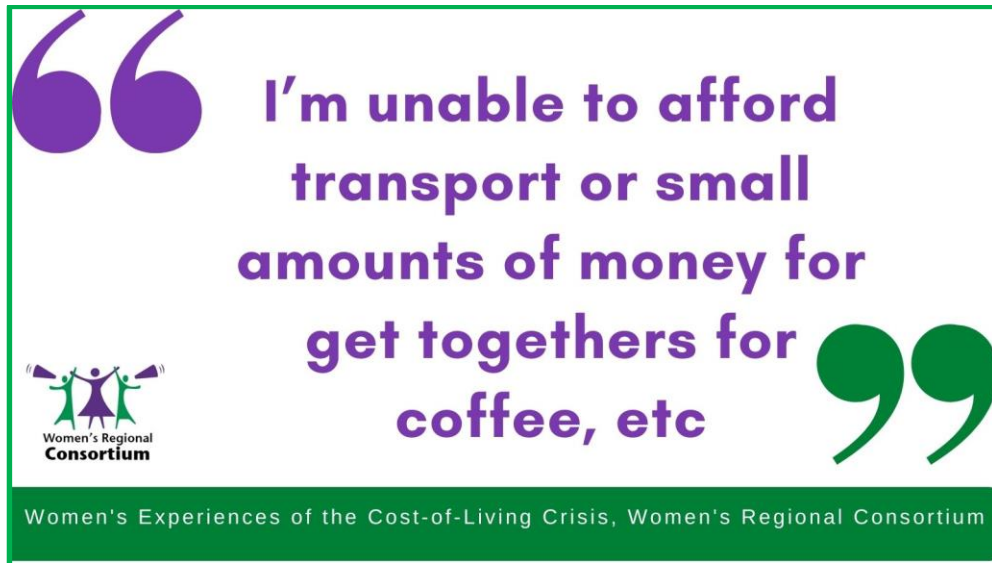
☐ No

Question 14: If you wish to provide comments supporting your answer, please do so below.

The consultation suggests a fee on a cost recovery basis likely in the region of £5-£10 for each card issued. In general, we are not opposed to the introduction of a fee as many of those who apply for a SmartPass will be able to afford this fee. However, for those on the lowest incomes we would like to see an exemption for those in receipt of certain social security benefits including Universal Credit, Carer's Allowance and PIP.

The Cost-of-Living Crisis has put increasing pressure on the household budgets of those on the lowest incomes resulting in a struggle to meet even the most basic household expenditure. Adding further costs to these households is likely to increase financial hardship and poverty as well as increasing social isolation and poor health outcomes.





Question 15: Do you think the half fare concession should be extended to free transport for people with a qualifying disability?

☒ Yes

☐ No

Question 16: If you wish to provide comments supporting your answer, please do so below.

Question 17: Do you think that disabled people who have difficulties using public transport should be entitled to have someone travel with them on their SmartPass?

☒ Yes

☐ No

Question 18: If you wish to provide comments supporting your answer, including opinions on how this proposal could work in Northern Ireland and potential eligibility criteria, please do so below.

Question 19: Do you think that the qualifying criteria for a SmartPass on the grounds of disability should be widened in line with other UK jurisdictions?

☒ Yes

☐ No

Question 20: If you wish to provide comments supporting your answer, including opinions on any changes that should be made to the current eligibility criteria for a Half Fare SmartPass, please do so below.

Question 21: Do you think the Concessionary Fares Scheme should be extended to include free transport for asylum seekers receiving asylum support and victims of human trafficking?

☒ Yes

☐ No

Question 22: If you wish to provide comments supporting your answer, including opinions on how you think this proposal could work in Northern Ireland, please do so below.

Asylum seekers have no right to work and this restrictive policy limits their ability to earn money, integrate into new communities and the opportunity to utilise their skills and participate fully in society. The current rate (£45 per week) for Asylum Support has been widely criticised and in 2022, the High Court ruled that it was too little to fulfil the legal obligation to *'meet the essential living needs of asylum seekers.'*¹¹ In the midst of the Cost-of-Living Crisis, it is incongruous that the Government argues that this rate is sufficient to cover *'average essential living needs'* for Asylum Seekers.¹²

¹¹ <https://www.lawcentres.org.uk/policy/news/news/home-secretary-acting-unlawfully-on-asylum-support-proves-law-centre-legal-challenge>

¹² Report on review of weekly allowances paid to asylum seekers and failed asylum seekers: 2021, Home Office, April 2022

Research carried out by the Women's Regional Consortium on the impact of the Cost-of-Living Crisis on women in Northern Ireland¹³ highlighted that the impact of the Crisis was even more acute for asylum seekers. While the asylum support payment saw a small uplift to account for cost of living increases, living on such low levels of income caused these women to really struggle with increasing prices for the most basic items. The women reported that travel costs were a significant issue for them. This included travel to their local Women's Centre and other education providers where they could access language skills, training and education and travel to bring children to school, to shop and to access appointments as well as social and cultural activities. Travel costs were a major barrier to their ability to do any of these things and they are unable to take any action to address these financial pressures as they are unable to work/access benefits or any Government help with cost of living increases.

We strongly believe that extending eligibility to include free transport for asylum seekers receiving asylum support and victims of human trafficking would provide significant benefits to many of these women and their children. It would enable them to better integrate with local communities, ensure that Northern Ireland is a more welcoming place for some of the most vulnerable communities and help to make them better able to build new lives here.

The figures for asylum seekers (around 3,000) and victims of human trafficking (547 people) outlined in the consultation document are small and therefore the cost implications are low to extend this eligibility. We believe that relatively low levels of expenditure to extend this Scheme to these groups would provide huge benefits to these individuals and their families and help to prevent social exclusion.

In terms of acceptable proof, anything which makes it easier for groups such as asylum seekers and victims of human trafficking to avail of the Scheme would be welcome. Introducing complex or difficult proof requirements will deter people from accessing the

<https://www.gov.uk/government/publications/report-on-review-of-cash-allowance-paid-to-asylum-seekers/report-on-review-of-weekly-allowances-paid-to-asylum-seekers-and-failed-asylum-seekers-2021>

¹³ Women's Experiences of the Cost-of-Living Crisis in Northern Ireland, Women's Regional Consortium, June 2023


<https://www.womensregionalconsortiumni.org.uk/wp-content/uploads/2023/06/Womens-Experiences-of-the-Cost-of-Living-Crisis-in-NI-2.pdf>

Scheme and defeat the purpose of the proposals. We agree with the suggestions outlined in the consultation document at paragraphs 9.13 and 9.14. However, we suggest that the Department should engage with colleagues in Migrant Centre NI/Law Centre NI who are better placed to advise on how to prove eligibility for these groups.

We also have some concerns about how this might be framed particularly if access is extended to asylum seekers and victims of human trafficking (which we would welcome) but taken away from some older people. There is already considerable tension in some quarters around the meagre provision that asylum seekers receive and there is concern that this might place their needs in competition with those of older people and cause them to face further unwarranted criticism.




**“ We have to pay for
all our travel out of
our weekly money ”**



Women's Regional Consortium

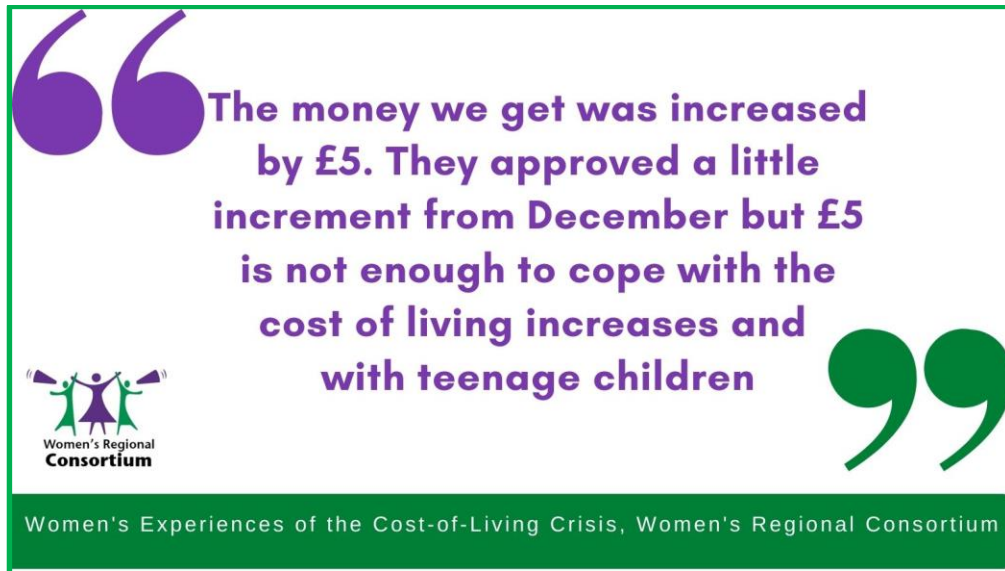
Women's Experiences of the Cost-of-Living Crisis, Women's Regional Consortium

**“ The Cost-of-Living Crisis has
caused me to experience
sleeplessness because I keep
thinking how to manage the
support we get and this makes
me panic a lot at any
small thing that happens ”**



Women's Regional Consortium

Women's Experiences of the Cost-of-Living Crisis, Women's Regional Consortium



Question 23: Do you think the current residency test for a SmartPass (3 months permanent residence) should be replaced by a different test (e.g., primary residence) to make it more accessible to all Northern Ireland residents?

☒ Yes

☐ No

Question 24: If you wish to provide comments supporting your answer, please do so below.

We believe that the current residency test should be replaced by a different test which does not require that a resident is here permanently for a period of three months. As highlighted in the consultation document Northern Ireland is the only region where this is the case and this seems unfair. Changing the current residency test for a SmartPass would bring Northern Ireland into line with neighbouring regions thereby simplifying the understanding of the Scheme overall.

Question 25: Do you think the list of proofs should be widened to make the Scheme more accessible to those older and disabled people who are already entitled to apply?

☒ Yes

☐ No

Question 26: If you wish to provide comments supporting your answer, please do so below.

The consultation document states 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.”*

The consultation document also states that it would be *“simpler and more cost effective if the existing list of proofs were widened and accepted on a permanent basis.”* We support these outcomes and would therefore like to see the list of proofs widened in order to make the Scheme more accessible especially to those who may have difficulty providing the current proofs and who are likely to be the most marginalised including those who are homeless with a disability.

Question 27: What is your name?

Siobhán Harding.

Question 28: What is your e-mail address?

policy@wsn.org.uk

Question 29: Are you responding as an individual or organisation?

Organisation.

Question 30: If responding on behalf of an organisation, please enter the organisation's name here

Women's Regional Consortium.

Question 31: The Department for Infrastructure would like your permission to publish your consultation response. Please indicate your publishing preference (Required)

We give permission to publish this response.

Question 32: We may wish to contact you again regarding your response, but we require your permission to do so. Are you content for the Department for Infrastructure to contact you again in relation to this consultation exercise?

Yes.

Question 43: If you wish to provide comments on the draft EQIA, please do so below.

We commend the Department for attempting a thorough EQIA and for identifying the impacts of the proposals given the data they have access to. We would however stress that access to disaggregated data is vitally important to the EQIA process allowing for the robust identification of impacts as well as mitigations to address inequalities.

It is absolutely essential to have access to disaggregated data across the full range of Section 75 groups in order to make a proper assessment of how these groups may be adversely impacted by these proposals. However, the EQIA states that “*data is not currently held*” in a number of areas including gender, ethnicity, people with dependents, etc. which are some of the groups which the EQIA goes on to highlight would be adversely impacted by the proposals (paragraph 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 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)."*

We are generally concerned about a lack of gender disaggregated data an issue that has been raised in the Gender Equality Strategy Expert Panel Report which stated: "*the lack of robust, disaggregated data is a major challenge.*"¹⁴ This lack of data in relation to gender makes it difficult to fully assess and address objective need. Without access to data disaggregated by gender and across all the Section 75 groups analysis of impact and intersectionality issues is made more difficult. It is also vital in determining where actions should be directed to effectively address inequalities. We note that data in relation to gender for SmartPass usage is not collected and we recommend that the Department request that this data is collected and publish this information.

We believe that the Department has made some positive suggestions around mitigations particularly for the most marginalised groups. However, despite identifying adverse impacts for older women as a result of raising the age eligibility no mitigations have been offered for this group.

The EQIA states that "*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 contributions.*" The EQIA goes on to highlight in paragraphs 6.51 and 6.52 that females earned 5.7% less than men, older women are more likely to leave employment earlier than men (between the ages of 63 and 64). It also details figures from the Travel Survey for NI which shows that women are less likely to hold a full driving licence than men restricting their

¹⁴ Gender Equality Strategy Expert Advisory Panel Report, December 2020
<https://www.communities-ni.gov.uk/system/files/publications/communities/dfc-social-inclusion-strategy-gender-expert-advisory-panel-report.pdf>

travel options and that women aged 60+ made a higher proportion of their journeys by public transport (6%) than men aged 60+ (3%).

Despite gaps in the available data particularly around SmartPass usage by gender, the available data strongly suggests that women will be more impacted by the age eligibility restrictions proposed. Yet no mitigations have been suggested for this group and we believe any anticipated savings cannot be justified given the unequal impact on women and the loss of many of the indirect benefits of the Scheme as outlined in paragraphs 1.11 and 1.12 of the consultation document.

We are also disappointed that the Department did not conduct and publish a Rural Needs Assessment. Access to transport is a significant issue in rural areas and the costs of travel are becoming increasingly difficult as a result of the Cost-of-Living Crisis. Research by NIRWN shows that rural women are under increasing pressure from the economic climate leaving them experiencing more poverty and social isolation than ever before.¹⁵ Rural women are particularly vulnerable to access poverty meaning that they are unable to address their financial poverty if they lack access to affordable childcare and transport to allow them to access better paid, better quality jobs.

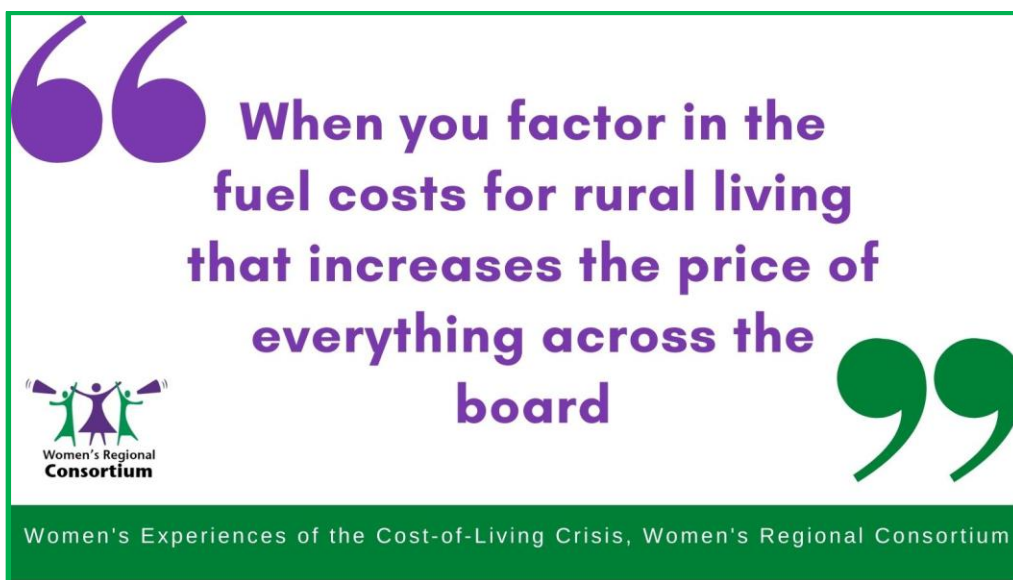
Women's Regional Consortium research¹⁶ showed that 38% of the women who took part in the research reported that they were finding it most difficult to pay travel costs. Rural women were particularly exercised about the increasing costs of travel and how this impacted on their lives.

¹⁵ Rural Women's Manifesto, NIRWN, September 2015

<https://www.nirwn.org/wp-content/uploads/2016/12/NIRWN-Rural-Womens-Manifesto.pdf>

¹⁶ Women's Experiences of the Cost-of-Living Crisis in Northern Ireland, Women's Regional Consortium, June 2023

<https://www.womensregionalconsortiumni.org.uk/wp-content/uploads/2023/06/Womens-Experiences-of-the-Cost-of-Living-Crisis-in-NI-2.pdf>

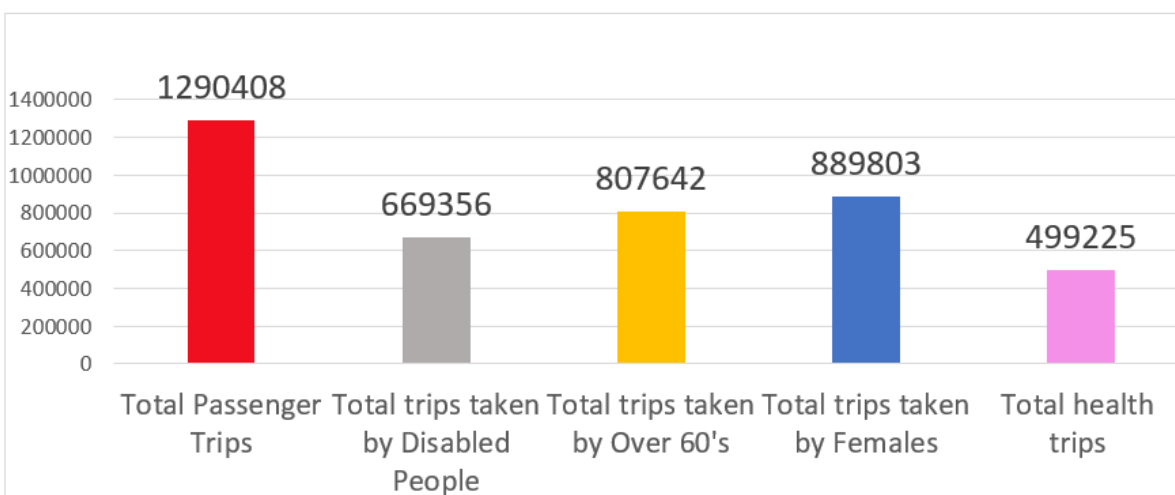


We would also ask the Department to consider the data available from the Community Transport Association. The proposals outlined in this consultation have direct implications for Community Transport and its members who use their SmartPasses to access Dial-a-Lift (DAL) services. In the financial year 2021/22 there were 150,094 trips provided under DAL and 93% of all trips used a SmartPass. The following graph included in the CTA’s response to this consultation shows that the proposals outlined in

this consultation will disproportionately impact on rural women as 70% of DAL journeys are taken by women. We agree with CTA that *“given the high level of SmartPass usage on dial-a-lift journeys, and that these trips are taken by older, disabled people and women, it is evident that these groups would be disproportionately impacted if there was a change to the SmartPass scheme.”* In addition, restricting access to this Scheme will have impacts on the local economy especially when considering that DAL journeys are made to rural towns and villages.

We are also in agreement with CTA’s assertion that the EQIA should consider the impact of these proposals on those who use their SmartPass on DAL journeys. The Department should consider the impacts on those who use their SmartPass for community transport before any decision would be applied in this area.

Rural Community Transport Partnerships Overall Figures 2017-2023



Cuts to Community Transport which have been proposed in the Department’s 2023-24 Budget EQIA were identified as having an adverse impact on older people, disabled people and women. These Concessionary Fares proposals will further impact on the adverse impacts for these groups.

We note that the EQIA recognises (paragraph 4.5) the environmental benefits of the Scheme with more people using public transport instead of travelling by car. This supports the Department's efforts to reduce carbon emissions in the transport sector. Therefore, restricting access to this Scheme would seem to contradict this resulting in harmful impacts for the environment and congestion levels if more people are forced into using a car as a result of these proposals.

It is also important to note that Northern Ireland is bound by the international human rights obligations of the UK including the Convention on the Elimination of All Forms of Discrimination against Women (CEDAW). CEDAW's most recent Concluding Observations for the UK¹⁷ expressed concerns that protections for women are falling behind those of women elsewhere in the UK and recommends that *"the State party incorporate all the provisions of the Convention into its legislation without further delay to ensure that the rights of women are guaranteed systematically and on an equal footing throughout all territories under its jurisdiction, including Northern Ireland."*

In relation to rural women the Committee is concerned about the obstacles faced by women and girls in rural areas in gaining access to education, employment and healthcare and support services due to, among other things, limited resources and access to transportation and the Internet. The Committee recommends that the State party adopts *"inclusive and accessible measures to facilitate women and girls access to education, employment, healthcare services and support services in rural areas, including by ensuring their access to transportation and Internet..."*

¹⁷ Concluding observations on the eighth periodic report of the United Kingdom of Great Britain and Northern Ireland, March 2019
tbinternet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolno=CEDAW%2fC%2fGBR%2fCO%2f8&Lang=en