

24 August 2023

NIC-ICTU response to DfI consultation on changes to the Northern Ireland Concessionary Fares Scheme

The ICTU is the largest civil society organisation on the island of Ireland, representing and campaigning on behalf of some 800,000 working people, 200,000 of whom live and work in Northern Ireland. There are currently 44 unions affiliated to Congress, north and south of the border.

Congress seeks to achieve a just society - one which recognises the rights of all workers and citizens to enjoy the prosperity and fulfilment which leads to a good quality of life. Quality of life embraces not just material well-being, but freedom of choice to engage in the arts, culture and all aspects of civic life. Congress strives to achieve economic development, social cohesion and justice by upholding the values of solidarity, fairness and equality.

Please accept this document as reflecting the views of the trade union movement in Northern Ireland, notwithstanding responses from affiliates and allies, whose views and submissions have shaped this response.

Respectfully, we are declining to utilise the online survey on the DfI website, as our points are succinct and will be expressed more effectively in the format of a short prose submission.

In summary, NIC-ICTU opposes the four options proposed to 'reduce the cost of the scheme'.

We believe these options are a false economy as the 'savings' will be small in the context of NI Executive spending. Imposing such a cut could have a greater impact on public expenditure in the medium and long term due to the corrosive social and health impacts of increasing social isolation for already marginalised people. There is also the very obvious, but usually understated or ignored public health bonus of an active lifestyle for elderly and people with disabilities and other disadvantaged people.

For those reasons, we support some of the options to promote social inclusion, such as extending free travel to people with disabilities and to asylum seekers and victims of human trafficking.

ICTU as a general point of principle supports universal public services funded through progressive taxation. Part of the rationale for this is that services which are universally available to all, not means-tested, tend to be better quality services than a two-tier system. The famous example of the trams of Zurich being both cheap, dependable and efficient enough to be the first choice for both senior banker and office cleaner makes that point.

It is also a useful rule of thumb that universal services are far cheaper to administer than those qualified by means-testing or some of the bureaucratic proposals suggested such as application and renewal fees or residency tests. The present administration costs of the scheme amount to 1.2% of the overall budget.

The reasons for the increased costs of the scheme over two decades are simple: inflation and increased life expectancy. The former is for reasons beyond the budgeting of the Dept for Infrastructure, and the latter is widely viewed as a positive effect of increased public health, and as mentioned this social positive is down to public investment in our NHS and official encouragement for people to have healthier lifestyles, such as getting out of their homes and participating in society, family life, leisure and consumption. However, it is also worth noting that demographic trends are now showing a stalling, or even reversal of overall life expectancy. We cannot assume that the additional cost of people living longer may not increase as it has in recent decades.

ICTU policy since 2019 has been to extend free public transport to everyone (now a trend across many cities in Europe). The motion from the PCS trade union and voted by conference overwhelmingly in favour stated:

“Fully funded, free public transport, provided by the public sector would remove the significant barriers to social and economic inclusion of the Island’s citizens from the elderly to the young, those in rural areas to cities. It will provide secure employment. It will connect communities. It will help create a greener environment and tackle climate change.”

All of those positives are still true. In addition, the affordability of free public transport for all was analysed and outlined by the Nevin Economic Research Institute:

“The government should consider expanded public transport that is free at the point of use as a move to reduce car use and alleviate transport costs.”

As mentioned, this response has been informed by civil society organisations as well as ICTU’s affiliates, trades unions and trades councils. In particular, we are grateful for the input of retired members sections and committees across our movement, who are retired from everyday employment but are still active citizens within the trade unions and also in a range of campaigning organisations such as Age NI, the National Pensioners Convention, the Pensioners’ Parliament and the NI Assembly all-party group on ageing.

We commend and support their submissions to this consultation response and would respectfully suggest that when ‘weighing’ responses, the Dept for Infrastructure bear in mind the thousands of working people who are members of our affiliates and for whom submissions like this one and those referred to are suitable reflected upon.

In their submission, Unison makes the valuable point that like all trade unions in NI, they remain *“fundamentally opposed to the major cuts being proposed across public services, including those outlined in this consultation. These are cuts that will detrimentally impact on our members, their families and their communities.”*

As mentioned above, many of the ‘cost-saving’ proposals are a false economy, in terms of long-term public health, and other unpaid services which support the economy such as providing childcare for family members so (mostly) women can participate in the labour market. As a union with many members working in the NHS, Unison is aware that:

“53% of the NI population aged between 55-64 live with a longstanding illness. Removing the concession from 60-64/65 year olds will inevitably lead to an exacerbation of existing health problems for those who cannot afford to travel without their SmartPass.”

Fewer visits to friends and family leads to social isolation and a deterioration in mental health and wellbeing. Existing research clearly demonstrates that inadequate and inaccessible public transport is a barrier to social participation – especially for older adults living in rural communities and those with mobility issues. Researchers and experts on loneliness and transport recommend interventions such as bus passes to support people in phases of life when driving is not an option, including older people.”

Unison also make an important point about the consultation’s proposals on social inclusion (Part B), and raise the concern *“that the framing of this consultation has the unintended effect of pitting marginalised groups against one another.”*

We are sure this is an untended perception, and would hope that public support for these sensible and decent suggestions above for transport policy will encourage their inclusion in a future Programme for Government by a restored NI Executive.

These proposals have the backing of the trade unions responding. We also support Unison’s observations on the EQIA, and in particular the need for a Rural Needs Assessment.

In their joint consultation response, SIPTU and GMB make salient points against the options to reduce the cost of the scheme which reflect unanimous views across the trade unions. For example, limiting SmartPass use to off-peak travel amounts to *“the introduction of a curfew on older people’s right to free association in the interests of budgetary requirements.”*

Unite the Union in their submission make significant points about the DfI budget, and in particular *“the funding package determined unilaterally by the Secretary of State... provided only £523.4m to the Department – a shortfall of 24% on the resource budget required.”*

Unite (who like SIPTU, GMB and TSSA represent many transport workers in NI) *“question the logic of proposals which run contrary to longstanding commitments by the NI Executive to effect modal transformation – moving people from cars onto public transport. The consequential reduction in service provision and uptake of public utilisation runs contrary to the very significant investment in public transport infrastructure which has been made in recent years, e.g. NW transport hub, York St exchange, track renewals and resignalling.”*

Unite also highlight *“there is no analysis in the consultation documentation of the likely scale of reduction of journeys taken that would result from this policy. There is no consideration of the likely impact on specific bus and rail routes of the policies if they were adopted and there is no consideration of the budgetary impact that this policy would have on Translink. In order to bring forward this policy and fully consider its impact on the travelling public – and indeed to provide a genuine consultative process – a detailed analysis identifying all specific routes and services that would be affected would need to be published. This has not occurred.*

“What is more, the cumulative impact of the chronic underfunding of public transport services in Northern Ireland needs to be included in any impact assessment. Since 2008, we have witnessed a large number of rural routes – in particular – being lost, merged together or reduced. This proposal threatens to further exacerbate the rural isolation of large swathes of Northern Ireland.”

Another negative highlighted is to NI’s carbon targets: *“Under the priority of ‘Active and Sustainable Transport’ the Executive agreed the goal of ‘Promotion of and access to safe, active and sustainable transport to encourage people to make environmentally responsible choices about transport’. It is*

immediate from the above consideration that all cost-saving proposals would directly contradict this objective.”

Similar observations are made by the National Pensioners Convention, who observe that “the DfI Strategic Framework states that ‘infrastructure investment can help mitigate the effects of climate change. It helps encourage sustainable forms of transport to help reduce emissions’ Therefore it is not strange that a proposal under consideration is to reduce or withdraw a measure which encourages the use of public transport?”

The NPC, like Disability Action Ballymena, Antrim & District Trades Council and other trade unions query the EQIA: *“It is Disability Action’s position that DfI have failed to comply with Statutory Disability Duties under Section 49A and 49B of the Disability Discrimination Act 1995. Specifically, the DDA Disability Duties require Council, in carrying out its functions, to have due regard to the need to:*

- *Promote positive attitudes towards disabled people, and*
- *Encourage participation by disabled people in public life*

As the proposals disproportionately impact upon disabled people and older people it is clear the proposed reductions in concessionary fares do not meet statutory provisions as outlined within Section 75 and 28E and Section 49A and 49B of the Disability Discrimination Act 1995.”

Ballymena, Antrim and District Trades Council have welcomed the “outcry of opposition which has greeted the publication of this ill thought out “Consultation” and calls on all political parties to get behind this opposition. Our older people have certainly earned the right to have free public transport travel, and it will impact on all of us one day. Indeed, we should be looking at providing free public transport for all, as is the case in a growing number of countries across the European Union.

For the Department of Infrastructure to even think of attacking this scheme in the middle of a Cost-of-Living crisis is nothing less than shameful, let us all remember there are over half a million pensioners already living below the poverty line. The Ballymena, Antrim and District Trades Council believe that any changes to the ‘Smartpass’ will ultimately cost Northern Ireland society much more in the long term.

Finally, NIC-ICTU endorses the view of the Commissioner for Older People NI, who responded: *“COPNI readily accepts that the Department faces serious financial pressures, must plan accordingly, and must make ‘tough choices’. However, lost in the accompanying language of ‘unavoidable’ austerity is that ‘the options’ outlined in the Consultation are in fact, choices, which a government department has identified. The proposals contained in the DfI Consultation document to reduce eligibility for the SmartPass amount to a government choice against older people.”*

In conclusion, the views of experts and users, of those who work in the transport system and those who see the social and health benefits of a universal service which is popular and appreciated, are clear. We do not need less access to free and subsidised public transport, but much more.

Fraternally



Gerry Murphy