

**WHIZZ
KIDZ**

We're here
for young
wheelchair
users



Beyond fare

Equality through
Concessionary Bus Travel



Foreword

Whizz Kidz is pleased to share this report following Freedom of Information Requests with Travel Concession Authorities (TCAs) in England. The report highlights the inequalities in bus travel across the country and the best practice being undertaken in some areas.

Bus travel offers young wheelchair users the freedom to attend school, work, health appointments and social activities. This in turn promotes improved independence and mental wellbeing. With some TCAs in England providing free travel at all times and some restricting travel to the minimum requirement of 9.30am to 11pm, there is clear discrimination against some passengers.

Whizz Kidz is calling on Government to work with TCAs to ensure free bus passes at all times for wheelchair users and other disabled travellers and we welcome the opportunity to discuss this with TCAs, Government departments and charities.

As the UK's leading charity for young wheelchair users, we believe every young person has the right to be included within society and providing appropriate public transport is a key element of this independence.

Sarah Pugh, Chief Executive



Two years ago, the Kidz Board launched our manifesto with four key focus areas including education, employment, access and travel/transport. When we discussed each area, it became apparent that across each of the regions there are different travel restrictions when using buses.

Working with the Policy team, we supported a Freedom of Information request to gather data to prove the additional costs and impact that having equality in bus travel would bring.

We are pleased to support the call that all TCAs should ensure a free bus pass, at all times, for young wheelchair users so that we can get to school and work in rush hour and stay out late with our friends like any other young person!

Ella, Kidz Board Chair



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Executive summary

The English National Concessionary Travel Scheme (ENCTS) has been in place since 2001. Since 2008, it has offered free off-peak local bus travel to eligible older and disabled people in England. Currently, the minimum mandatory requirements for the scheme state that Travel Concession Authorities (TCAs) must offer free travel between 9:30am and 11pm, Monday to Friday, and any time on Saturday, Sunday, and Bank Holidays.

Whilst some TCAs provide enhancements to the statutory minimum, such as travel for a flat fee before 9:30am or free travel for individuals with a specific disability, our research has found only 26.8% of TCAs offer free travel to all disabled bus pass holders at all times of day. Young wheelchair users have told us this has created a problem for them. It impacts their ability to access education institutions and employment opportunities, the lack of consistency of the rules creates a postcode lottery and young wheelchair users feel disadvantaged by yet another barrier.

In order to find out more about the implementation of the ENCTS, Freedom of Information requests were submitted to all 83 TCAs in England. The results from one TCA were not valid for our research. We found:

60 of 82 TCAs have time restrictions on when disabled people can use their bus pass.

For those TCAs which provided the relevant data, we found:

- Disabled pass holders made 23.2% of the total concessionary bus trips.
- Disabled pass holders accounted for 19.5% of the total spend on concessionary travel.
- 10.7% of all concessionary bus passes issued in 2022/2023 were disabled passes.

22 of 82 TCAs allow disabled people to use their bus pass at any time of day.

For those TCAs that provided the relevant data, we found:

- Disabled pass holders made 24.2% of the total concessionary bus trips.
- Disabled pass holders accounted for 24.1% of the total spend on concessionary travel.
- 14.0% of all concessionary bus passes issued in 2022/2023 were disabled bus passes.

To provide free travel to all disabled pass holders at all times of day, TCAs with time restrictions estimated this would cost, on average, £45,200 more per annum – or 1% of the average total amount spent on all concessionary travel in the financial year 2022/2023.

TCAs that currently provide free travel at all times of day said the benefits to disabled people of doing so include social inclusion, access to employment and education, better health and wellbeing, and improved access to services and independence. They also remarked on the benefits to the TCA and wider community, which included economic benefits, a more diverse and inclusive society, better environmental sustainability, and improved overall public health.

1. Introduction

The Kidz Board are a group of young wheelchair users, proud to each represent a different area of the UK. They meet several times a year, making sure their voices, and young wheelchair users more generally, are at the heart of every decision Whizz Kidz makes. The Kidz Board raised the issue of inconsistent and discriminatory rules surrounding the use disabled bus passes.

Currently in England, the minimum mandatory requirements for the National Concessionary Travel Scheme are free travel between 9:30am and 11pm, Monday to Friday, and any time on a Saturday, Sunday, or Bank Holiday. Whilst some Travel Concession Authorities (TCAs) offer discretionary enhancements to these travel times, many do not. Young wheelchair users have told us this affects their ability to access education, employment and generally travel freely when they would like to.

This report will review the issues that disabled people face when their bus passes are limited to use between 9:30am and 11pm. It will provide an analysis of the 82 Freedom of Information responses received from TCAs across England, both those that currently have time restrictions upon disabled bus pass usage and those that offer free travel at all times of day to all disabled bus pass holders. It will then discuss the benefits to disabled people, the local authority, and the wider community which can arise when free any time travel is granted to all disabled bus pass holders.

2. Background research

2.1 The English National Concessionary Travel Scheme

The English National Concessionary Travel Scheme (ENCTS) has been in place since 2001, offering mandatory bus concession for older people and disabled people. The scheme has been gradually extended over the years and since April 2008 it has provided free off-peak local bus travel to eligible older and disabled people anywhere in England¹.

Currently, the minimum mandatory requirement for TCAs to offer is free travel between 9:30am and 11pm (described as off-peak or core hours), Monday to Friday, and any time on Saturday, Sunday, and Bank Holidays. The statutory minimum for London is different to that of the rest on England – travel concession must be provided at any time during the weekend and bank holidays, and from midnight to 4:30am and the period from 9:30am to midnight on any other day. TCAs are able to offer additional discretionary enhancements to these minimum standards, such as free travel before 9:30am, discounted travel before 9:30am, or a flat fee for travel before 9:30am. There are 83 TCAs in England; at the time of completing our research, only 26.8% offer free anytime travel to all disabled bus pass holders seven days a week.

2.2 The barriers to young wheelchair users

2.2.1 Lack of consistency

There is a considerable lack of consistency on the use of disabled bus passes – a small minority of TCAs offer free travel at all times of day, some provide free travel from 9:00am, some offer discounted fares or a flat fee before 9:30am, or a handful provide free travel at all times to individuals with specific conditions (e.g. those with visual impairments). Many TCAs offer no discretionary enhancements, providing only the minimum requirements of the ENCTS. The variation in the restrictions from area to area is unnecessary and confusing, with the changing times and concessions available to different areas creating a postcode lottery for young wheelchair users with respect to their independence and freedom.

“[Free any time travel would] enable people to get to school, work, college, medical appointments and meet up with friends without the worry of sometimes being able to use it and sometimes not” – Whizz Kidz Research Panellist

2.2.2 Accessing education and employment

Many disabled people who qualify for a bus pass are either unable to drive or would have great difficulty travelling long distances without transport – for wheelchair users, this can often be further compounded by inaccessibility of some built environments. With the vast majority of education institutions and places of employment commencing their workday

¹ [Guidance for travel concession authorities on the England national concessionary travel scheme - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/travel-concession-authorities-on-the-england-national-concessionary-travel-scheme)

before 9:30am, disabled people using public buses have no choice but to pay for their commute if their local TCA does not offer discretionary enhancements on travel times. Simply going to work or study incurs yet another cost to the disabled community who, on average, face additional costs of £975 a month compared to their non-disabled counterparts². With current statistics revealing the disability employment gap in the UK stands at 29.8%³, it is imperative that needless barriers to employment and education are removed.

“If you want us to be able to integrate and contribute economically, we need the opportunity to build social capital and skills” – Whizz Kidz Research Panellist

2.2.3 Fairness under the Equality Act 2010

The Equality Act 2010 defines fairness against disabled people as unfavourable treatment because of something in consequence of their disability. When disabled people are unable to use their bus pass before 9:30am or after 11pm, it denies them their independence and freedom, as well as the right to fully participate in public life. The mandatory concession for all of England provides free travel only during off peak hours and implies disabled people do not hold a place in the world of work, education settings, or in wider social activities, and dismisses their right to equal opportunities.

“We aren’t just disabled between the hours of 9:30am and 11pm” – Whizz Kidz Research Panellist

2.3 The Research Panel

We asked our Research Panel, made up of young wheelchair users and parents/carers of young wheelchair users, about their experiences using their disabled bus passes. Across our Research Panel, we found:

- 53% of respondents had a disabled bus pass.
- Only one respondent (14%) answered yes when asked if they can travel for free before 9:30am and after 11pm, whilst 29% answered no, and 57% were unsure.
- One respondent had experienced needing to travel prior to 9:30am but were unable to use their bus pass to do so – they were travelling to the train station for work purposes.
- One respondent had experienced needing to travel after 11pm but were unable to use their bus pass to do so – they said this had happened when coming home from parties, the university library or late-night cinema screenings.
- 100% of respondents felt it was ‘very unfair’ or ‘unfair’ that disabled bus passes cannot be used everywhere before 9:30am and after 11pm on weekdays.

² [Disability Price Tag 2023: the extra cost of disability | Disability charity Scope UK](#)

³ [Employment of disabled people 2022 - GOV.UK \(www.gov.uk\)](#)

3. Methodology

3.1 Freedom of Information requests

To gather further information about the ENCTS, Whizz Kidz submitted Freedom of Information (FOI) requests to all local authorities who are the responsible body for each TCA. Under the Freedom of Information Act 2000, the public can access information held by the public authorities, either by authorities publishing certain information or by the public requesting information. Whizz Kidz submitted FOI requests to find out more about the number of passes issued, the number of journeys made and the financial cost.

For all TCAs, we requested the following information for the financial year 2022/2023:

- How many concessionary bus passes were issued?
- How many disabled bus passes were issued?
- How much was spent on all concessionary bus pass travel?
- How much was spent on disabled bus pass travel?
- How many bus trips were made by concessionary bus pass holders?
- How many bus trips were made by disabled bus pass holders?
- How many bus trips were made by disabled bus pass holders before 9:30am?
- How many bus trips were made by disabled bus pass holders after 11pm?
- Do you offer a young person's bus pass? And if you do, what are the benefits of the young person's bus pass?
- Does the disabled bus pass include free travel for a travelling companion?

For those who do not provide free travel at all times for all disabled bus pass holders, we also asked:

- How much additional cost would there be if you lifted the time restrictions and provided free bus travel at all times for all disabled bus pass holders per financial year?
- Please can you explain how you calculated this figure.

Finally, for TCAs which did provide free bus travel at any time to all disabled bus pass holders, we asked:

- Can you tell us the benefits of providing free travel for disabled bus pass holders, for disabled people and your organisation?

The responses to these questions were then subject to analysis to understand the patterns that occur in TCAs with time restrictions and TCAs without time restrictions, allowing for comparisons to be made.

4. Data and analysis

4.1 Overview

FOI requests were dispatched to the responsible body for each TCA in England. Responsible bodies included councils (borough, city, and county), integrated transport authorities (such as Tyne and Wear ITA), combined authorities (such as West Yorkshire Combined Authority), and government bodies (such as Transport for Greater Manchester).

Responses were received from 83 TCAs. One TCA, the Isle of Scilly, was discounted from analysis on account of having no local authority bus service due to its very small population.

4.2 TCAs with time restrictions

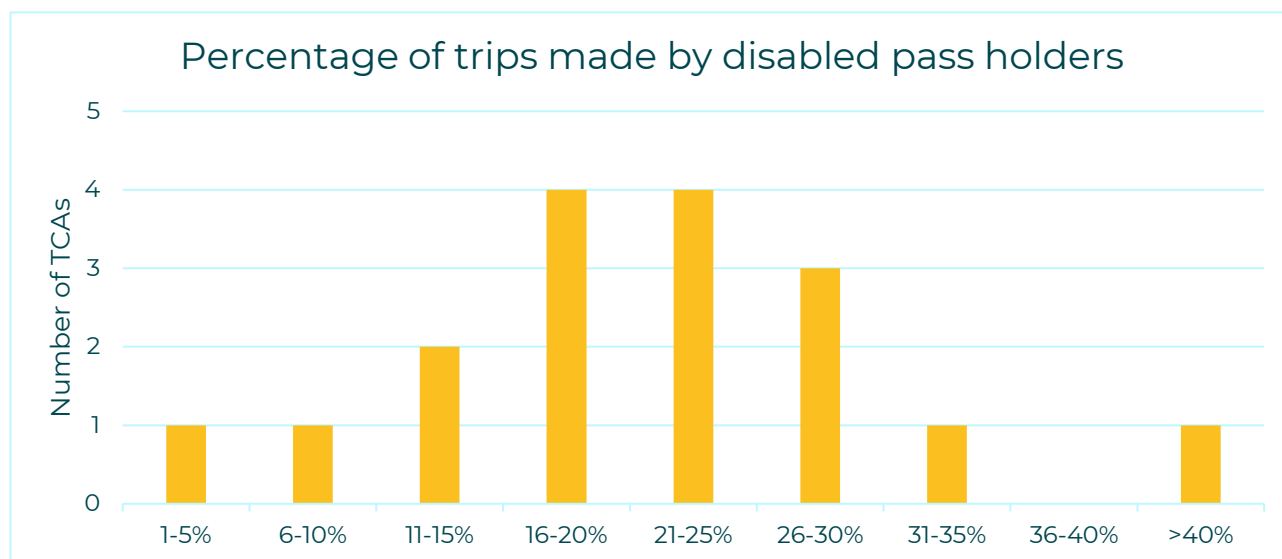
The following 60 TCAs all have time restrictions in place for when disabled bus passes can be used. Whilst some of the below may offer some enhancements to minimum 9:30am-11pm travel times – such as free travel from 9am, flat fees for travel before 9:30am, or free travel at all times of day for those with specific conditions – according to our research, none of the TCAs offer free travel at all times of day for all those who hold a disabled bus pass.

TCAs with time restrictions			
Bath and North East Somerset	Bedford	Blackburn with Darwen	Blackpool
Bournemouth, Christchurch and Poole UA	Buckinghamshire	Cambridgeshire	Cheshire East
Cheshire West and Chester	City of Bristol	County of Herefordshire	Cumberland
Derbyshire	Devon	Durham	East Riding of Yorkshire
East Sussex	Essex	Gloucestershire	Halton
Kent	Lancashire	Leicestershire	Luton
Medway	Milton Keynes	Norfolk	North East Lincolnshire
North Northamptonshire	North Somerset	North Yorkshire	Nottinghamshire
Oxfordshire	Peterborough	Plymouth	Rutland

TCAs with time restrictions			
Shropshire	Slough	Somerset	South Gloucestershire
Southampton	Southend-on-Sea	Stoke-on-Trent	Suffolk
Surrey	Swindon	Tees Valley ITA	Telford and Wrekin
Thurrock	Torbay	Tyne and Wear ITA	Warwickshire
West Berkshire	West Northamptonshire	West Midlands ITA	West Yorkshire
Wiltshire	Wokingham	Worcestershire	York

4.2.1 Trips

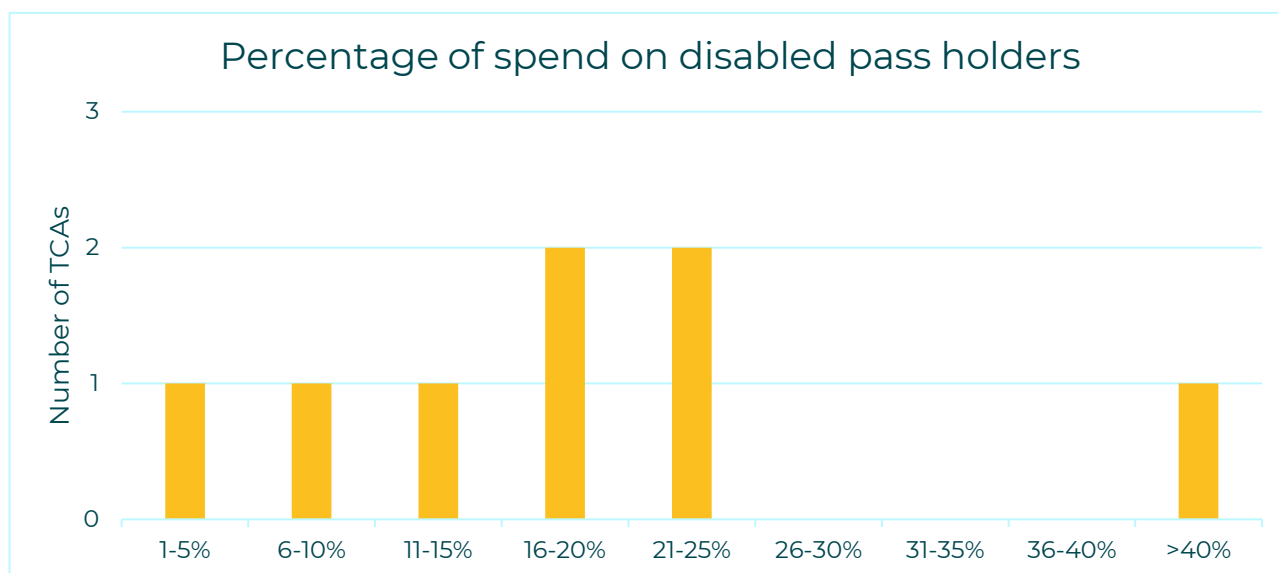
Of the 60 TCAs with time restrictions, 72% did not break down their data on trips by pass type and were therefore unable to disclose how many concessionary trips were made by disabled people and how many were made by other groups. For the 27% that held separated data, TCAs saw an average of 1,620,115 trips made by solely by disabled pass holders compared to the 6,977,320 trips made by all concessionary pass holders. Consequently, for these TCAs, disabled pass holder trips represented around 23.22% of the total concessionary trips.



Generally, the percentage of trips made by disabled pass holders accounted for 16-20% or 21-25% of the total trips. The lowest percentage was 2% for Leicestershire, and the highest was West Northamptonshire at 43%.

4.2.2 Spend

In total, 52 of the 60 TCAs (87%) did not break down their spending by pass type to know what proportion of spending could be attributed to disabled pass holders. For the 13% of TCAs which did hold separated data, the average spend on all concessionary bus travel was £9,417,265 and the average spend on disabled bus travel was £1,837,060. Therefore, spending on disabled bus pass holders accounted for 19.51% of total spend on concessionary travel.



In many cases, TCAs spent 16%-25% of their total concessionary spend on disabled bus pass holders. Once again, there is considerable spread of the data, with the lowest percentage being Blackpool at 1% and the highest West Northamptonshire at 43%.

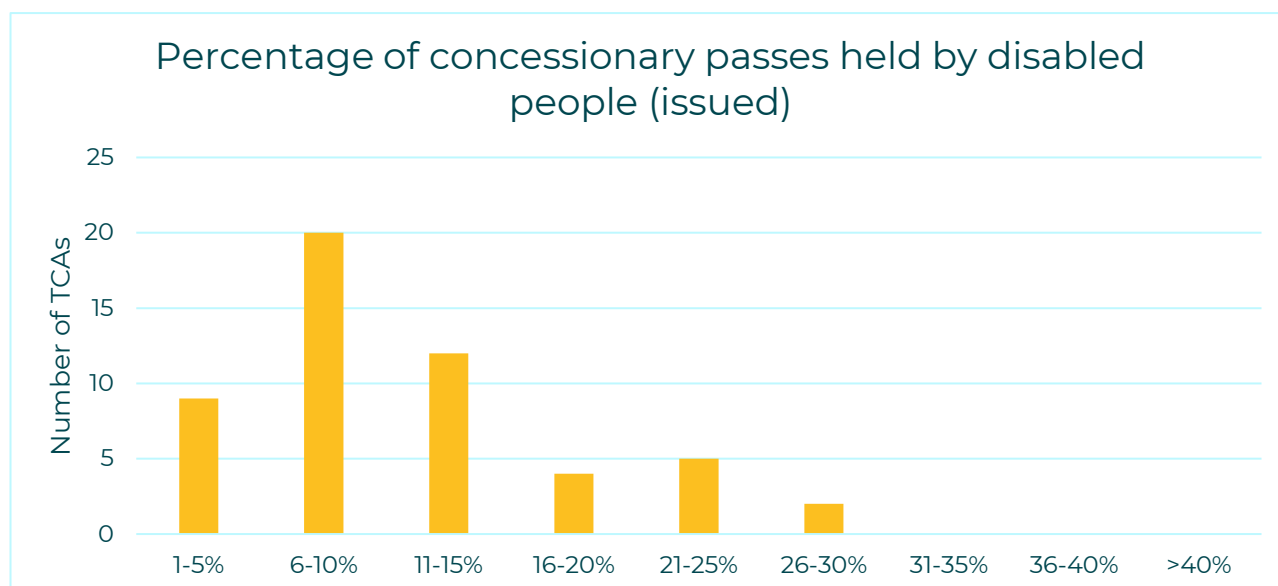
4.2.3 Passes

Although the FOIs requested that TCAs share the number of passes issued in the financial year 2022/2023, a minority of authorities instead provided the total number of passes in circulation in their locale. These two metrics have therefore been separated in the following section. Overall, all of the TCAs provided information on the number of passes, with 55 TCAs giving the number of passes issued in the financial year 2022/2023, and 5 TCAs providing the total number of passes in circulation in their area.

4.2.3.1 Passes issued

Of the 55 TCAs that provided the number of passes issued, 95% of these TCAs could share information on how many of these concessionary passes were issued to disabled people as they recorded their data by the type of pass issued.

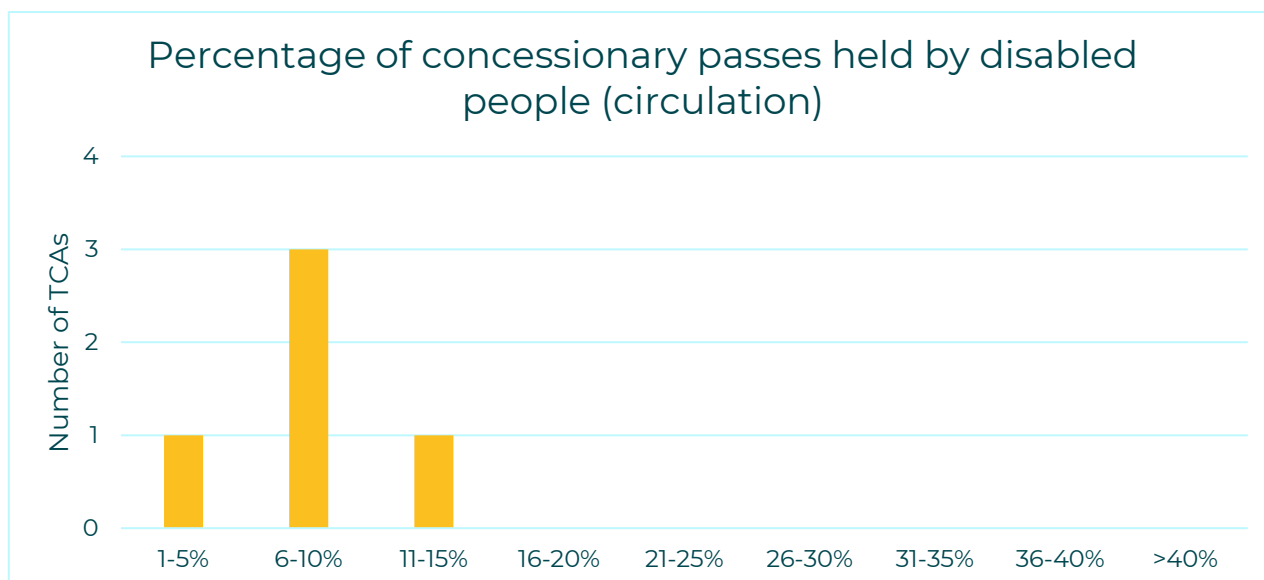
On average 3,572 disabled bus passes were issued in the financial year 2022/2023. Compared to a total pass issued average of 33,304 for these TCAs, we can therefore discern that 10.73% of the total passes issued belonged to disabled bus pass holders.



Once again there was some variety in the percentage of passes that were issued to disabled people – in Rutland, 3% of the passes issued were disabled bus passes, whereas in Blackpool and Milton Keynes 26% of all those issued were disabled passes. Generally, for the TCAs that provided the relevant data, around 6-10% of passes were issued were for disabled people.

4.2.3.3 Passes in circulation

For the five TCAs who instead provided the number of passes currently in circulation in their area, on average there were 92,527 concessionary passes in circulation, 6,140 (or 6.64%) of which were disabled bus passes.



Whilst for the majority of TCAs around 6-10% of all passes in circulation were disabled passes, there was some spread in the data still. In Gloucestershire, 4% of passes were disabled passes, yet in Luton, 13% of passes were disabled passes.

4.2.4 Additional costs of any time travel

TCAs who currently do not offer free any time travel were asked for an estimation of what the additional annual cost would be if they were to remove all time restrictions to all disabled pass holders.

- Five TCAs provided an estimation of the additional annual cost that would be associated with introducing free any time travel to all pass holders.
- 55 TCAs stated they did not hold this information or were unable to calculate a cost with the information they had available to them.

The table below shows the estimated costs.

TCA	Estimated additional cost	% of the spend on all concessionary travel in 2022/2023
Blackburn with Darwen	£29,243	1.58%
Blackpool	£32,211	0.95%
East Sussex	£71,052	0.96%
Norfolk	£50,000	0.41%
Wiltshire	£43,533	1.16%
Average	£45,208	1.01%

The figures provided show that, on average, a TCA should expect an estimated additional cost of £45,208 to offer free travel to all disabled bus pass holders at all times of day. This on average accounts for 1.01% of the amount these TCAs spent on all concessionary travel in the financial year 2022/2023.

4.3 TCAs without time restrictions

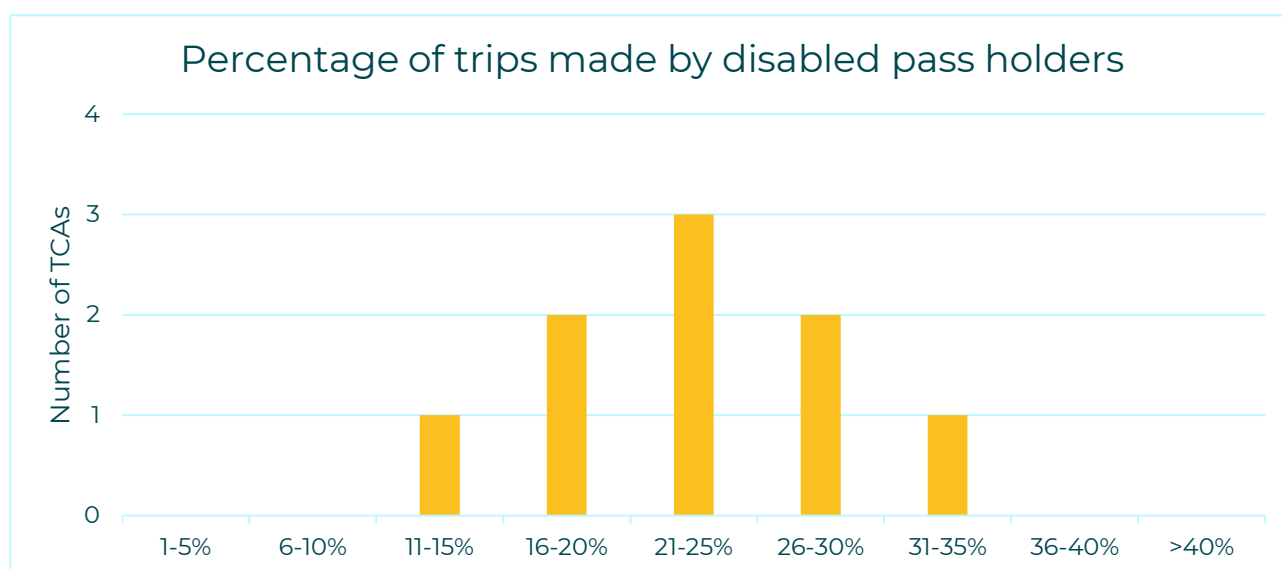
The following sections focus on the 22 TCAs with no time restrictions at all. In these TCAs, disabled bus pass holders can travel for free at any time of day, any day of the week.

TCAs without time restrictions			
Bracknell Forest	Brighton and Hove	Central Bedfordshire	City of Kingston upon Hull
Cornwall	Greater Manchester ITA	Hampshire	Hertfordshire
Isle of Wight	Leicester	Lincolnshire	Merseyside ITA
North Lincolnshire	Northumberland	Nottingham	Portsmouth
Reading	South Yorkshire	Staffordshire	Warrington

TCAs without time restrictions			
West Sussex	Windsor and Maidenhead		

4.3.1 Trips

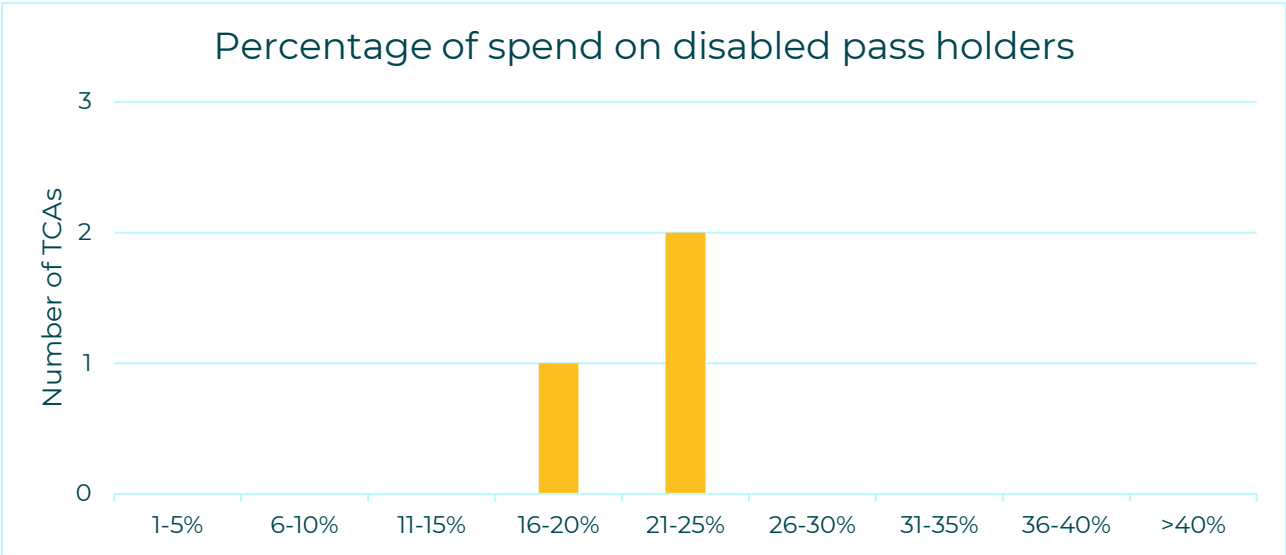
Overall, of the 22 TCAs without time restrictions, 59% did not break their data down further to separate the number of trips made by disabled bus pass holders compared to other groups, such as older people. For the 41% that did provide separated data, TCAs reported an average of 2,649,313 trips made by disabled pass holders, compared to a total 10,964,930 concessionary trips. As a result, for those that provided both data sets, disabled bus pass holders accounted for 24.16% of all concessionary bus trips in the financial year 2022/2023.



The TCA with the lowest percentage of trips made by disabled pass holders was Lincolnshire with 13%. Conversely, Brighton and Hove saw the highest percentage with almost a third (32%) of concessionary trips made by disabled pass holders.

4.3.2 Spend

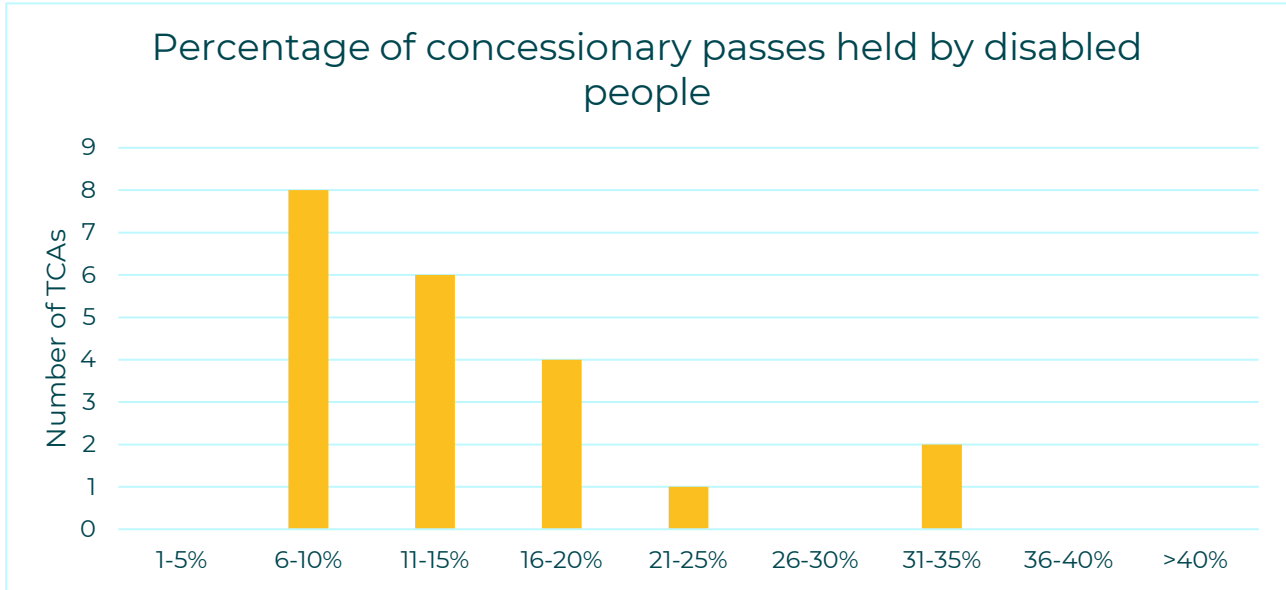
Only three of the 22 TCAs (14%) without time restrictions were able to tell us how much is spent solely on the cost of disabled bus travel – the remaining 86% of TCAs did not separate their data to know the amount spent on disabled pass holders compared to other pass holders. For these three TCAs, an average of £4,195,157 was spent on disabled pass travel compared to an average of £17,420,814. Therefore, for the TCA which provided the relevant data, spend on disabled bus travel represented 24.08% of the total expenditure on all concessionary trips.



The lowest proportion of spending on disabled pass holders was made by West Sussex, with 23% of the total concessionary travel spend funding disabled bus pass travel. On the other hand, the TCA with the greatest proportion of spending was Merseyside at 25%.

4.3.3 Passes

Only one of the 22 TCAs (5%) was unable to offer data for both the number of concessionary passes issued, as well as the number of disabled passes issued.



For the 21 TCAs that could provide both datasets, an average of 50,703 concessionary passes were issued in the financial year 2022/2023, with 7,108 of these (14.02%) issued to disabled people. The TCAs with the highest proportion of disabled bus pass holders was Portsmouth with 32%, whereas the lowest was Central Bedfordshire at 6%. The most common percentage of passes held by disabled people was 6-10%.

4.3.4 Trips outside of core hours

Seven of the TCAs who offer free travel at all times of day held details of bus trips made outside of the 9:30am-11pm core hours.

TCA	All concessionary bus trips	Disabled bus trips	Trips outside of core hours	% of disabled trips outside core hours
Brighton and Hove	5,544,651	1,789,915	184,190	10%
Cornwall	3,137,435	560,322	57,980	10%
Leicester	6,503,493	1,844,754	211,732	11%
Lincolnshire	2,630,775	344,047	65,147	19%
Merseyside	23,757,217	5,986,877	596,559	10%
South Yorkshire	23,700,000	4,200,000	566,334	13%
West Sussex	5,568,762	1,302,097	203,362	16%

For these seven TCAs, on average there were 10,120,333 trips made in the financial year 2022/2023 by all concessionary pass holders, and 2,289,716 of these trips were made by disabled pass holders. An average of 269,329 of these disabled pass holder trips occurred outside of the core hours of 9:30am-11pm.

This means around 12% of all disabled bus pass trips made in these TCAs occurred outside of the core hours. This represents 3% of all concessionary journeys occurring in these TCAs.

4.3.5 Cost of non-core travel

Of the 22 TCAs that offer free any time travel to disabled people, three provided the information needed to calculate the cost of disabled pass trips that take place outside of the 9:30-11pm core hours: total spend on concessionary travel, spend on disabled travel, total trips made by disabled pass holders, and trips made by disabled pass holders outside of core hours.

TCA	Total spend on disabled travel	Total trips by disabled pass holders	Spend per trip	Disabled pass holder trips outside of core hours	Cost of trips outside of core hours
Leicester	£1,574,556	1,844,754	£0.85	211,734	£180,729
Merseyside	£8,906,074	5,986,877	£1.49	596,559	£887,440
West Sussex	£2,104,830	1,302,097	£1.62	203,362	£328,733
				Average	£465,634

With this data, it is possible to then calculate that, on average, the cost of disabled bus trips that take place outside of core hours is £465,634, which is 12.35% of the total spend of disabled travel, and 2.82% of total spend on all concessionary travel.

4.3.6 Benefits of free travel

TCAs were requested to provide information on the benefits of offering free travel at all times to both disabled people and to the local authority.

- Ten TCAs advised that the information is not held by the council or that the request was opinion rather than data and therefore declined to comment.
- Three TCAs provided generic information on ENCTS and how this is applied within their TCA.
- Two TCAs were thought to impose time restrictions and therefore were not asked this question.
- Seven TCAs provided a full response to the question.

4.3.6.1 Benefits to disabled people

All seven TCAs who provided a full response supplied information about benefits of free any time travel to disabled people.

Theme	Number of responses
Socialisation and/or social inclusion	4
Employment	3
Health	3
Access to services	2
Independence and/or independent living	2
Education	2
Increase in disposable income	1

Theme	Number of responses
Wellbeing	1
Equal opportunities	1
Confidence	1
Accessible and convenient travel	1

The most frequently mentioned benefits to disabled people were socialisation and/or social inclusion, employment and health. Following these were access to services, independence/independent living and education.

Some of the comments received to this question are included below verbatim:

- “Some of the academic evidence suggests that pass holders use the concession to socialise, including making trips that they would not otherwise make if they had to pay a fare. Also, the ENCTS has incentivised some concessionary travellers to be more active as bus journeys are likely to involve some element of walking, and may serve as a means to further physical activity at their destinations.”
- “The literature also confirms that the abolition of fares has contributed small increases to pass holders’ disposable income. Additionally, some motorist pass holders report the concession has encouraged them to switch some car trips to the bus, and helped them avoid some motoring costs, such as parking fees.”
- “The direct benefit to the pass holder is that they do not have to pay for their public transport journey. Public transport provides them with a highly accessible, convenient, and greener form of travel.”
- “For disabled, it encourages independence, social inclusions and wellbeing; reduced cost of transport.”
- “We are supporting disabled residents to ensure they have access to health, employment and training to encourage independent living.”
- “Disabled bus pass holders are not only elderly but cover all age groups. They therefore have need to attend schools, colleges, university and employment, most of which require travel before the commencement of the statutory off-peak English National Concessionary Travel Scheme, which only provides off peak travel for free. Reading Borough Council has consistently supported the provision of free travel at all times as a way of assisting disabled people access the full range of activity that non-disabled can access in a cost effective and accessible manner.”

4.3.6.2 Benefits to the local authority

Of the seven TCAs that gave full responses, four touched on benefits that are felt by the local authority. The themes of the responses are included in the following table.

Theme	Number of responses
Inclusion and diversity	3

Theme	Number of responses
Environmental sustainability	2
Economic	2
Public health	1

The comments to this question are included below verbatim:

- “It discourages the use of the private motor vehicle and helps to reduce congestion, which is of benefit to the local economy and environment.”
- “For authority, it encourages mode shift, increases economic productivity, social inclusion, environmental sustainability and public health.”
- “It also benefits the council as we are keeping in line with our Customer Promise to “ensure our services are inclusive and responsive to your needs”.”
- “The benefits to both disabled people and Reading Borough Council are inclusivity of all sections of the population making Reading a more diverse and successful town in which to live work or visit.”

5. Discussion

5.1 Comparison of results

TCAs without time restrictions issued a greater percentage of disabled bus passes (14.02%) than TCAs who had time restrictions in place (10.73%). Additionally, the same trend was true of trips made by disabled pass holders, with a slightly higher percentage (24.16%) of trips made by disabled bus pass holders in the financial year 2022/2023 compared to TCAs with time restrictions (23.22%).

Given that TCAs without time restrictions offer free travel at all times of day, it is understandable, if not expected, that the number of trips made by disabled people is slightly higher. This may also contribute to the higher percentage of disabled bus passes being issued – if disabled people know they can use their pass at all times of day for free travel, they may be more likely to apply for a pass.

It is perhaps unsurprising then that there is a slightly higher percentage spend of 24.08% on disabled pass holders in TCAs without time restrictions in comparison to those areas that do have time restrictions (19.51%). TCAs without time restrictions are reimbursing the cost of all journeys disabled pass holders make, whereas those TCAs with time restrictions are not. It is important to recognise there are many factors that could influence the cost to providing free travel at all times of day, such as the size of the population and the number of disabled people in the TCA. Furthermore, it may be difficult to estimate how many additional journeys will occur outside of core hours should time restrictions be removed. That said, estimated or actual, the cost of providing free bus travel to disabled pass holders at all times of day remains, on average, less than 3% of the total spend on concessionary travel for the financial year 2022/2023.

	TCAs with time restrictions	TCAs without time restrictions
% of trips made by disabled people	23.22%	24.16%
% of issued passes held by disabled pass holders	10.73%	14.02%
% of spend on disabled pass holders	19.51%	24.08%
Additional cost of free anytime travel as a % of the 2022/2023 spend on all concessionary travel	1.01% (Estimated)	2.82% (Actual)

5.2 Benefits of free travel for disabled people

The 2021 Bus Back Better Strategy said that buses ‘bring people to jobs, study and local services; they liberate people who are disabled and isolated’⁴. The impact of accessible and reliable travel cannot be understated – it can facilitate social networks, promoting self-esteem and confidence; improve access to both education and employment, upskilling individuals and enabling social mobility; and strengthen wellbeing through leisure visits.⁵

In order to reap those benefits listed above, transport must be financially accessible. The Department for Transport’s *Transport and Inequality Report* found that ‘Cost is a primary obstacle to the use of transport’ and, as a result, the affordability of public transport is central to the level of impact transport can have on inequality.⁶ The cost is particularly pivotal to disabled people – nearly half of all people in poverty are either a disabled person or live with a disabled person⁷. Disabled people face a considerably higher cost of living than non-disabled people, with many funding the cost of specialist equipment or consuming higher than average amounts of energy and utilities, both of which might be essential requirements for a disabled person to function on a daily basis. The impact of the pandemic and the UK cost of living crisis has caused prices to climb further. Research carried out by Scope found that ‘on average, disabled households (with at least one disabled adult or child) need an additional £975 a month to have the same standard of living as non-disabled household’⁸ – this figure accounts for the impact of disability benefit payments, such as PIP, which are intended to address some of these costs. This cost continues to spiral for households with more than one disabled person, rising to £1,248 per month in homes where there are two disabled adults and at least two children⁹.

Bus fares, and the cost of public transport more generally, has been on the rise for some time. Since 2010, fares have risen by 1.4% a year in real terms¹⁰, and they have risen at a much faster rate than other modes of transport¹¹. These rapidly increasing costs disproportionately impact lower income households who are more likely to use buses than those with higher incomes due to the cheaper cost.

5.2.1 Education

Having an education and gaining qualifications safeguards a young person’s future. Working-age graduates continue to have higher employment rates, work in higher skilled employment, and have a medium nominal salary that is £11,500 more than working-age non-graduates¹².

⁴ [Bus back better - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/bus-back-better)

⁵ [The Inclusive Transport Strategy: achieving equal access for disabled people - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/the-inclusive-transport-strategy)

⁶ [Transport and inequality - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/transport-and-inequality)

⁷ [UK Poverty 2019/20 | Joseph Rowntree Foundation \(jrf.org.uk\)](https://www.jrf.org.uk/research/uk-poverty)

⁸ [Disability Price Tag 2023: the extra cost of disability | Disability charity Scope UK](https://www.scope.org.uk/disability-price-tag-2023)

⁹ [Ibid](#)

¹⁰ [Bus back better - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/bus-back-better)

¹¹ [Trends in transport costs - The Health Foundation](https://www.healthfoundation.org.uk/research/trends-in-transport-costs)

¹² [Graduate labour market statistics, Calendar year 2022 – Explore education statistics – GOV.UK \(explore-education-statistics.service.gov.uk\)](https://explore-education-statistics.service.gov.uk/)

However, disabled people are less likely (24.9%) to have a degree as their highest qualification than non-disabled people (42.7%)¹³. They are also more likely to have no qualifications (13.3%) compared to non-disabled people (4.6%)¹⁴. Given that nearly half of all people in poverty are either a disabled person or live with a disabled person, there is no other group in society that would benefit more from the social mobility and employment opportunities an education can offer.

Whilst Disabled Students' Allowance (DSA) should go some way to cover the cost of transport where needed, the allowance is not currently working effectively. Only 29% of students in England and Wales with a known disability were receiving DSA¹⁵, and those who have been through the application process have noted the bureaucracy, long delays, inconsistencies in the quality of support provided, as well as a general lack of communication¹⁶. Often, students will begin their courses without the support they need, and it can be several months before this comes into place, leaving them at an unfair disadvantage.

University students are particularly affected by the 9:30am time restrictions in some TCAs. Young disabled people attending university will often have two addresses – their home address with their parent/guardians and their university address during term time. Individuals are only permitted to hold only one bus pass which allows free travel within the TCA it was issued, subject to their time restrictions. Using this pass in another TCA, even one which offers free any time travel, affords its user free travel only during the statutory minimum of 9:30am-11pm. This will therefore disproportionately impact disabled students who have dual addresses.

Free bus travel at all times of day would open the door to disabled people accessing an education – removing both the disadvantage they face with the delays to DSA, and the financial barrier of paying for travel during peak hours.

5.2.2 Employment

Disabled people currently remain an untapped asset to the workforce. Currently, the disability employment gap stands at 29.8% in the UK¹⁷. From July to September 2022, only around half (52.6%) of working age disabled people were in employment, compared to around eight in ten (82.5%) for non-disabled people¹⁸. Although employment rates are lower for disabled people, this is not due to a lack of interest in being employed; 22% of economically inactive disabled people wanted a job in 2021/22 in comparison to 15.7% of economically inactive non-disabled people¹⁹.

¹³ [Outcomes for disabled people in the UK - Office for National Statistics \(ons.gov.uk\)](https://ons.gov.uk/people-and-population/disability-and-health/disabledpeople/articles/outcomesfordisabledpeopleintheuk/2019-01-01)

¹⁴ Ibid

¹⁵ [Report into the Disabled Students Allowance \(lordchrisolmes.com\)](https://lordchrisolmes.com/reports/report-into-the-disabled-students-allowance/)

¹⁶ Ibid

¹⁷ [Employment of disabled people 2022 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/statistics/employment-of-disabled-people-2022)

¹⁸ Ibid

¹⁹ Ibid

Inclusive and reliable transport is vital in connecting disabled people to employment opportunities – this is particularly true of bus travel as 44% of all bus journeys are for the purpose of work or education²⁰. Disabled people are more likely than others to be reliant upon public transport; 33% have no car in the household compared to 13% of the general population²¹. Due to their condition, some disabled people may be unable to drive or hold a driving license, or they may find it very difficult to travel long distances. The impact of poor transport on disabled people's job prospects is tangible. A survey among disabled people found that 23% of respondents who were actively seeking work had to turn down a job offer, and a further 23% a job interview, because of inaccessible transport. Furthermore, 48% said their choice of jobs was restricted due to inaccessible transport, with this figure rising to 62% of wheelchair users²².

The vast majority of workplaces begin their work day before 9:30am and, for many people in employment, their commutes to their place of work will begin earlier still. When TCAs offer free travel to disabled people at all times of day, rather than the statutory minimum of after 9:30am, a key barrier to accessing employment is removed. Supporting more disabled people into work will not only benefit the disabled community – just by halving the disability employment gap there would be a £17 billion increase to the economy every year²³.

5.2.3 Social inclusion

Socialisation and social inclusion are equally important reasons for disabled people to have access to free bus travel as both education and employment, and were cited by most TCAs as one of the benefits of free travel to disabled people.

As well as assuring the right to employment and education, the United Nations Convention on the Rights of Disabled Persons (UNCPRD), to which the UK is a signatory, affirms disabled people's right to living independently and being included in the community (article 19) and participation in cultural life, recreation, leisure and sport (article 30)²⁴. Despite this, it has been found that 'disability and poor health are associated with an increased risk of loneliness'²⁵. This is corroborated by the ONS's *Outcomes for disabled people in the UK: 2021* which found that, 'in the year ending March 2021, disabled people were more likely to report feelings of loneliness "often or always" (15.1%) than non-disabled people (3.6%), a percentage point difference of 11.5'²⁶. They also had poorer scores for the following areas: for life satisfaction, for feeling that the things done in life are worthwhile, for happiness yesterday, and for anxiety yesterday²⁷.

²⁰ [Bus back better - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

²¹ [Disability, accessibility and blue badge statistics, England, 2022 to 2023 - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

²² [The Case For The Urban Bus \(urbantransportgroup.org\)](https://urbantransportgroup.org)

²³ [An Equal Future | Disability charity Scope UK](https://www.equalfuture.org.uk)

²⁴ [Convention on the Rights of Persons with Disabilities – Articles | United Nations Enable](https://www.un.org/en/conventions/treaty/crpd/articles)

²⁵ [The Inclusive Transport Strategy: achieving equal access for disabled people - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

²⁶ [Outcomes for disabled people in the UK - Office for National Statistics \(ons.gov.uk\)](https://ons.gov.uk)

²⁷ Ibid

The links between transport, inclusion and wellbeing are well established. Transport facilitates people's ability to participate in social and leisure activities and be an active member of their community – particularly amongst disabled people who are more likely to rely on public transport systems. The report entitled *Transport and Equality: An evidence review for the Department for Transport* found there to be a considerable overlap between social inclusion and physical and mental wellbeing. Transport is said therefore to play 'a central role in enabling people to come together and connect'²⁸. Free bus travel at all times of day could greatly improve the wellbeing of disabled people across England.

5.2.4 Health

Several TCAs said that providing free travel to disabled bus pass holders at all times of day benefitted the health and wellbeing of disabled people, and the public health of their local authority.

In the most direct sense, offering free bus travel at all times of day enables disabled people to journey to and from any medical appointment or treatment independently. This can mitigate expenses associated with medical appointments, such as the cost of a taxi, or the cost of fuel and parking charges. This could have considerable cost savings for disabled people who have frequent medical appointments. Free bus travel can also promote good health in the broader sense of personal health and wellbeing. As already established, disabled people face a greater risk of loneliness. Improved access to bus services will enable individuals to be more mobile, get out of their home, visit friends and family, and participate in leisure opportunities and their local communities more easily and without any added expense.

Bus travel and public transport can also influence health indirectly through the Social Determinants of Health (SDH). The World Health Organisation (WHO) describes the SDH as 'non-medical factors that influence health outcomes', and state that they have important influences over health inequalities, defined as 'the unfair and avoidable differences in health status'²⁹. In all nations across the world, irrespective of their income, health and illness, and socioeconomic income follow the same trend; the lower a person's socioeconomic standing the worse their health³⁰.

The WHO lists the following as just some of the common SDH: income and social protections; education; employment and job security; social inclusion and non-discrimination. Research shows that SDH have key influences over health, with many studies finding their impact to account for 30-55% of health outcomes, more than that of health care or lifestyle choices³¹.

²⁸ [Transport and inequality \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

²⁹ [Social determinants of health \(who.int\)](https://www.who.int)

³⁰ Ibid

³¹ Ibid

It has been established in this discussion that public transport that is financially accessible can contribute to employment and education opportunities, social inclusion and income for disabled people. This is reported amongst TCAs who provide free any time travel in their listed benefits to disabled people. Therefore, not only can free bus travel promote health in the traditional sense of accessing appointments and improving personal wellbeing, but it can also work to tackle some of the major SDH.

5.3 Case studies

Two TCAs have recently made changes to their application of the ENCTS within their areas of authority, going beyond the statutory minimum requirements and removing the time restrictions on disabled bus pass use. In Norfolk, the change has already come into effect as of 1 February 2024, whilst in Warwickshire, the County Council currently are running a one-year trial due to conclude on 31 July 2024.

In both cases, the reasons for making such a change support those listed in the discussion – improving wellbeing and health, supporting education and employment, and ensuring social inclusion. For Norfolk, the estimated cost of doing so is only £50,000 per year, whilst Warwickshire do not believe the trial will have any impact on their current costs.

5.3.1 Norfolk County Council

At the time of sending FOIs, the county of Norfolk offered some discretionary enhancements to the statutory minimum. These enhancements included free travel at any time for blind and partially sighted individuals, and some rural services would accept concessionary passes before 9:30am due to the infrequency of buses along these routes. Whilst these enhancements went beyond the mandatory 9:30am-11pm window, they did not offer free travel at any time of day for all disabled bus pass holders.

However, from 1 February 2024, Norfolk County Council announced all residents who hold a disabled concessionary pass would be eligible for free bus travel 24 hours a day, seven days a week, when travelling within the county. This will benefit the 14,500 people across Norfolk who hold a disabled bus pass, as well as their eligible companions³².

The decision to increase the level of enhancement to offer all disabled pass holders the ability to access free travel at all times stemmed from an updated equality impact assessment of the scheme. The previous enhancements only benefitted those with a disabled pass who were blind or partially sighted, and it was deemed unfair to offer this to only one select group of disabled people. A recommendation was therefore made to extend this offer to all disabled pass holders. Graham Plant, Cabinet Member for Highways, Infrastructure and Transport, noted the benefits this will have for disabled people; 'it ensures they have access to work, education and leisure, and helps to combat the risks of social isolation which can be associated with having a disability'³³. Additionally, he

³² [24/7 free travel to all disabled bus pass holders in Norfolk - Norfolk County Council](#)

³³ Ibid

expressed that benefits will also be felt by the council, particularly with reference to encouraging greater use of public transport and meeting the council's net-zero targets.

Norfolk County Council estimates that the annual cost of providing this enhancement to be £50,000 which will be funded by their ring-fenced public transport budget provided by the Department for Transport³⁴. Given that in the financial year 2022/2023, Norfolk County Council spend a total of £12,191,863 on all concessionary travel, the £50,000 estimate will account for a mere 0.41% of the total spend that financial year.

5.3.2 Warwickshire County Council

Warwickshire County Council is among those TCAs which did not offer any time travel for all disabled pass holders. However, the council is currently trialling this within the TCA.

Whilst the TCA did offer free travel from 9am onwards for those with a disabled bus pass as a discretionary enhancement, from 1 August 2023 until 31 July 2024, disabled bus passes will be eligible for use 24 hours a day, seven days a week. On their website, the council state that this change will 'enable passholders to get to work, school and college using their bus passes, which has previously not been possible as they were only valid from 9am'³⁵.

The trial follows the findings of a 2022 survey circulated to a representative sample of passholders in the county. With over 12,000 responses, making this the largest survey response Warwickshire County Council has ever received, the survey found that 54% of respondents who hold a disabled person's pass rely on their bus pass and do not have access to a car³⁶. Consequently, 54% of disabled person's passholders also favoured free all-day travel for disabled person's passholders in the survey responses³⁷.

In the Cabinet Free Bus Travel Scheme Review, it is noted only 4.4% of passholders hold disabled person's passes and not all these will want or need to travel prior to 9am³⁸. This would allow passholders the opportunity to access education, training and employment before 9am and remove any potential barriers that they currently face, especially if they do not have access to a car. The expansion of the timings for which disabled passes will be eligible are expected to have no impact on expenditure in 2023-2024 according to the council, on account of operators already being paid at 100% of pre-covid levels when current patronage is much less than this³⁹.

Warwickshire Councillor, Jan Matecki, who is Portfolio Holder for Transport and Planning, said of the trial: "The national concessionary travel scheme is a vital service for many of our disabled residents in Warwickshire, and we are committed to ensuring that it provides

³⁴ Ibid

³⁵ [Disabled bus passes get more flexible in Warwickshire – Warwickshire County Council](#)

³⁶ [Free Bus Travel Concessionary Travel Scheme Review.pdf \(warwickshire.gov.uk\)](#)

³⁷ Ibid

³⁸ Ibid

³⁹ Ibid

additional benefits such as increased flexibility and improved access to essential services for our own residents. We are confident that these changes to the scheme will achieve these goals for a larger number of residents than ever before”⁴⁰.

5.4 Scotland and Wales

Both Scotland and Wales currently provide free bus travel 24 hours a day, seven days a week to all disabled bus pass holders. Therefore, should it be made mandatory for TCAs to offer free any time bus travel to all disabled pass holders, this would bring England into line with Scotland and Wales.

Scotland has offered free travel to all disabled pass holders at all times of day since it introduced its concessionary travel scheme in 2004⁴¹. Following a review of the scheme in 2010, research was commissioned to gather the feedback and views of both older and disabled people. This research took place over two years and found the following^{42 43}:

- 39% of respondents said the most important aspect of the scheme was financial savings, whilst 20% said individual independence or freedom, and 14% said allowing them to get out of the house.
- Young disabled people felt they had increased confidence and independence as a key benefit of the scheme.
- 12% of respondents under 65 said they used their pass for work purposes.
- 77% of those with a disabled or visual impaired pass said the scheme helped them improve or maintain their sense of wellbeing.
- Those with disabled or visually impaired pass were more likely to use their card for medical appointments (16%), accessing support services (4%) or education (3%).

These findings only further support the benefits that free all-day bus travel can have for disabled people, aligning closely with those mentioned by TCAs which do already provide unrestricted travel.

⁴⁰ [Disabled bus passes get more flexible in Warwickshire – Warwickshire County Council](#)

⁴¹ [Eligibility and Conditions for the 60+ or Disabled Traveller \(transport.gov.scot\)](#)

⁴² [Concessionary Travel: Customer Feedback Research - Year One Report | Transport Scotland](#)

⁴³ [Concessionary Travel: Customer Feedback Research - Year Two Report | Transport Scotland](#)

6. Conclusions

Young wheelchair users told us they find the time restrictions that dictate the use of their disabled bus passes to be unjust, creating an additional and unnecessary barrier to disabled people. The rules surrounding timings are inconsistent across England and the changing times and concessions available to different locations has produced a postcode lottery, with some young people benefitting from free travel at all times and others restricted to only 9:30am-11pm free travel. This has impacted on their ability to access education and employment opportunities, as well as impeded on their freedom to travel independently as and when they need and engage in social and leisure activities.

The current mandatory concession for England which sees free travel offered during only off-peak hours sets a poor precedent and a worrying implication that disabled people do not hold an equitable place in society, be this in work, in education or in social and leisure settings. Young wheelchair users and their families have told us they feel like their independence and their ability to economically contribute and build social capital is being limited. They feel like they're being penalised for simply being disabled when they just want the same opportunities as any other person.

The FOI analysis of TCAs revealed that only 26.8% of TCAs in England offer free travel at all times of day to all disabled bus pass holders. These TCAs saw, on average, 3.35% more passes issued to disabled people, 0.94% more trips made by disabled pass holders, and spent 4.57% more on travel on disabled pass holders. For these TCAs, bus trips that are made by disabled pass holders outside of the 9:30am-11pm core hours account for only 3% of all concessionary trips and cost on average only 2.82% of the total spend on concessionary travel in 2022/2023. Whilst there are inevitable increases in cost associated with providing all day travel to all disabled pass holders, this increase is a very small fraction of the total spending – for TCAs who currently have time restrictions, their estimation of the additional cost is even lower at £45,500 per annum or 1.01% of their 2022/2023 total concessionary spending.

The cost of this, whether 1.01% or 2.82%, is entirely outweighed by the benefits to disabled people. By resolving the issue of travel, disabled people will have improved access to employment and education opportunities, facilitating social mobility, as well as enabling disabled people the autonomy and freedom to participate in social activities and engage and participate within their communities. In turn, this can lead to improved wellbeing and overall health. There will be wider benefits to society, such as those listed in section 4.3.6.2: improved public health, environmental sustainability, economic benefits, and more inclusive and diverse communities.

For these reasons, Whizz Kidz and the Kidz Board are calling for the introduction of mandatory free bus travel at all times of day for those in England with a disabled bus pass, bringing England into line with both Scotland and Wales.



**We're here
for young
wheelchair
users**

**You can find the Beyond Fare report
on our website:**

wkidz.org/policy

If you want to get in touch with Kidz Board or Whizz Kidz about this guide or any other way you feel we can support young wheelchair users, please contact us.

Kidz Board

kidzboard@whizz-kidz.org.uk

Whizz Kidz Policy Team

policy@whizz-kidz.org.uk



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