



# NI WOMEN'S BUDGET GROUP

## **NORTHERN IRELAND WOMEN'S BUDGET GROUP (NIWBG) RESPONSE TO THE CONSULTATION ON CHANGES TO THE CONCESSIONARY FARES SCHEME**

**Department for Infrastructure (DfI)**

**Prepared by Alexandra Brennan (Coordinator) of NIWBG**

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The Northern Ireland Women's Budget Group (NIWBG) is made up of organisations and individuals from the women's sector, trade union movement, academia and wider civil society in Northern Ireland, with the aim of implementing a gender equal economy. The members of the NIWBG scrutinise policy and budgetary matters with a gendered lens to bring attention to the different ways in which women and men are affected by government-level decision-making. It aims to provide policy- and budget-makers with policy analysis to secure substantive equality for women and men through the assessment of gender impact.

The NIWBG works with a range of organisations in Northern Ireland on devolved issues and with sister organisations in Wales, Scotland, England and Ireland on East-West and North-South issues.

We hope that our response to the consultation will be considered by the Department for Infrastructure.

If there are any questions or comments regarding the NIWBG's consultation response, please direct them to the Coordinator for the NIWBG, Alexandra Brennan ([info@niwbq.org](mailto:info@niwbq.org)).

## Introduction

The NIWBG welcomes the opportunity to respond and provide relevant expertise in relation to the consultation prepared by the Department. We emphasise the importance of embedding equality considerations and gender analysis at all levels of the policy-making process, so that this essential Scheme can continue to provide the support necessary to ensuring the accessibility of public transport. We need ambitious and creative decision-making to ensure that those most marginalised in society do not face a degradation of equality, but rather a promotion of equality.

We endorse the response of the Women's Policy Group, which we contributed to, and the responses of Unison NI, Disability Action NI, and the Women's Regional Consortium.

## Benefits of Free/Reduced Fares

At the beginning of the consultation, the Department outlined the numerous social, economic, environmental and public health benefits to providing free public transport to those over 60 and those with qualifying disabilities. This has a particular positive impact on gender equality in Northern Ireland. The Department noted that, "...people are more likely to take up the concessionary travel pass if they are in lower income households, have no access to cars, live in urban areas or generally live near better transport"<sup>1</sup>. While this is based off English data, we know that it is a similar situation in Northern Ireland. A particularly gendered reason for using public transport is not having access to cars, as it is common for the man to use the car freely if the household only has one car. Free public transport becomes women's ticket to participation in public life; this is particularly true for women in rural areas. Social isolation is another massive issue for women living in rural areas; free and discounted public transport is a key tool to tackling this issue. The Department also notes that the Scheme increases independence and promotes good health outcomes – for people with disabilities and older people, who are at a higher risk of exclusion from public life, this is a lifeline.

The wider community benefit such as, "*enabling older and disabled people to volunteer, stay involved in church or charity work, help with childcare, or visit friends and family*,"<sup>2</sup> is immense and again, facilitates older people and people with disabilities to participate in public life. '*Help with childcare*' is a particular gendered benefit. Northern Ireland has incredibly expensive childcare with no free provision like elsewhere in the UK, and many people rely on older relatives to provide full-time or part-time childcare. This essential support allows many women to work and/or upskill through apprenticeships and/or higher education. Increasing the Scheme's age restrictions could worsen the accessibility and availability of informal childcare. Without this option, many women would not be able to afford current childcare options and could be forced into economic inactivity as a result.

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<sup>1</sup> Department for Infrastructure (DfI). 2023. *Consultation on changes to the Concessionary Fares Scheme*. (<https://www.infrastructure-ni.gov.uk/sites/default/files/consultations/infrastructure/nicfc-2023-ni-concessionary-fares-schemer.PDF>).

<sup>2</sup> Ibid.

The indirect benefits of the Scheme are numerous, as listed by the Department in the consultation document. Another indirect benefit that was not mentioned by the Department are the environmental benefits to increased access and usage of public transportation. Northern Ireland must play its part in achieving the 17 Sustainable Development Goals (SDGs) by 2030, and accessible public transport is key to *SDG 11: Make cities and human settlements inclusive, safe, resilient and sustainable*<sup>3</sup>. Transport is also a key element to the *Climate Change Act (Northern Ireland) 2022*; maintaining free/reduced fares for people 60+, widening free/reduced fares for people with disabilities, and extending free/reduced fares to asylum-seekers and victims of human trafficking are key to encouraging usage of public transport and moving our society towards a greener future.

## **Part A: Options to Reduce the Cost of the Scheme**

### **Option 1 – Raising Age Eligibility**

In the consultation document, the Department offers 4 options to help reduce the overall cost of Scheme to ensure that it continues to provide essential support. The first of these options is around raising the age eligibility, as it is currently 60+. Option 1A, which is to continue with no change to policy, is difficult as the current budget restrictions mean that its current spend will not be enough to see the Scheme through until the end of the year. However, Option 1B and 1C sees the removal of passes for 60+ SmartPass holders and the new age eligibility raised to 65 for 1B and 66-67 for 1C. This would impact a significant number of people aged 60-64. It would also disproportionately impact women, particularly rural women, aged 60-64 who rely on public transport for everyday journeys, as women are more likely to use public transport for short journeys than men and more likely to use public transport overall than men<sup>4</sup>.

One of the proposed mitigations to Options 1B and 1C was to only have the new age eligibility criteria apply to new applicants only. If the Department goes ahead with one of the options, despite the identified impacts, the suggested mitigations should be put in place as no one should have their SmartPass taken off them.

### **Option 2 – Limiting SmartPass Use to Off Peak Travel Only**

The proposal to change the times that people can travel with their SmartPass to off-peak only would have significant impacts, especially if the Department plans to expand those that can avail of free/reduced fares. The Department notes in the consultation document that, “*As those with a SmartPass would need to pay to travel before 09:30, the change may have the unintended consequences of impacting those in low-paid roles that require early morning shifts or impacting on those that have caring responsibilities (mainly women)...[or] who use their SmartPass to attend early medical appointments.*”<sup>5</sup> The Department also notes that this could worsen the gap between people with disabilities in employment and people without

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<sup>3</sup> United Nations (UN). 2021. *The 17 Goals*. ([THE 17 GOALS | Sustainable Development \(un.org\)](https://www.un.org/sustainabledevelopment/))

<sup>4</sup> Women's Policy Group (WPG). 2021. *NI Covid-19 Feminist Recovery Plan: Relaunch – One Year On* (<https://wrda.net/wp-content/uploads/2021/07/WPG-COVID-19-Feminist-Recovery-Plan-Relaunch-One-Year-On.pdf>).

<sup>5</sup> Ibid. n1

disabilities in employment. This Option would have massive repercussions, and groups like asylum-seekers and victims of human trafficking are not even included in this analysis.

### **Option 3 – Limiting SmartPass Use to Bus Travel Only**

All methods of public transport need to be made available to SmartPass holders. The impacts on accessibility for people with disabilities and older people is significant. While not all SmartPass holders have easy access to trains, taking rail travel away from those with accessibility issues who prefer rail travel could result in further isolation for those who see that as their only public transport option. As noted in the comments under **Option 2**, the Department should not restrict *when* SmartPass holders travel, so they should not restrict *how* they travel either.

### **Option 4 – Application, Renewal, and Replacement Fees**

While we are not against application, renewal, and replacement fees in the region of £5 - £10, we firmly believe that people in receipt of certain benefits such as Universal Credit, PIP, Carer's Benefits, etc. should not have to pay the fee as it still may be a deterrent to applying for/renewing/replacing a SmartPass. The cost-of-living crisis has made a fee of £5 - £10 difficult to pay; women struggling to pay for essentials like food and energy<sup>6</sup> and there are higher rates of food bank usage<sup>7</sup>. If fees are introduced, mitigations for those struggling to afford the basics should be put in place to ensure that those who need free/reduced travel the most can access it.

## **Part B: Options to Promote Social Inclusion**

### **Option 5 – Free Travel for Those Currently Receiving a Half Fare Concession Due to a Qualifying Disability**

We support the expansion of free travel to those receiving half-fare concession due to a qualifying disability. The Department has outlined the current risks of increased social inclusion and lack of accessibility for those with qualifying disabilities that do not receive free travel; the negative impacts of not implementing this change far outweighs the additional spend needed. The Department notes that expanding free travel to those with qualifying disabilities "*...has the potential to increase access to training and employment opportunities, key services, and social networks for people with disabilities.*"<sup>8</sup> Improved transport access to training and employment opportunities would be an essential factor in mitigating the employment gap between people with disabilities and people without disabilities. While we are currently faced with a budget crisis, this change should not be seen as a 'cost' but rather an investment in improving accessibility, well-being and overall equality of people with disabilities.

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<sup>6</sup> Women's Regional Consortium. June 2023. *Women's Experiences of the Cost-of-Living Crisis in Northern Ireland*. (<https://www.womensregionalconsortiumni.org.uk/research/>)

<sup>7</sup> Trussell Trust. 2023. *Emergency food parcel distribution in Northern Ireland: April 2022 – March 2023*. (<https://www.trusselltrust.org/wp-content/uploads/sites/2/2023/04/EYS-Northern-Ireland-Factsheet-2022-23.pdf>)

<sup>8</sup> Ibid. n1

## **Option 6 – Companion Passes for Disabled People Unable to Travel Alone**

We support the development of a companion pass for those with qualifying disabilities that does not allow for them to travel alone. This is a positive step in increasing the accessibility and affordability for those with disabilities that previously limited use of public transport.

Our only concern with the companion pass is that people with qualifying disabilities that cannot travel alone will be exploited for free travel. Further conversations with colleagues in countries/regions where this policy is in place (Scotland, Wales, and the Republic of Ireland) may shed light on mitigations in place to prevent this from happening.

## **Option 7 – Extend the Qualifying Criteria for a Half Fare SmartPass in Line with Other Jurisdictions**

We support the extension of the qualifying criteria for a Half Fare SmartPass to help combat social exclusion amongst people with disabilities that do not currently receive any concessionary fares. Not only would this bring us in line with other jurisdictions, as mentioned in the consultation document, it would be another tool in tackling widespread inequalities faced by people with disabilities.

## **Option 8 – Free Transport for Those Receiving Asylum Support and Victims of Human Trafficking**

Providing free transport to asylum-seekers and victims of human trafficking would have significant, direct, positive impacts on asylum-seekers and victims of human trafficking, as well as indirect, positive impacts on society as it allows for increased social inclusion and participation in public life for some of the most marginalised people in our society. Again, this policy change should be viewed as a long-term investment in integrating asylum-seekers and victims of human trafficking into public life, as opposed to a short-term cost to the Department. We specifically direct the Department to the response of the Women's Policy Group, as an in-depth response is provided demonstrating the specific positive impacts this policy change would have and outlining how this policy change should look.

One concern we do have is the incorrect yet possible connection people might make between the raising of the SmartPass age eligibility and the introduction of free transport for asylum-seekers and victims of human trafficking. We are worried that people engaging with this consultation may use asylum-seekers and victims of human-trafficking as a scapegoat for the possible changes to the age requirement for SmartPasses. This is incredibly harmful to a vulnerable group of people who already face social exclusion. We urge the Department to clarify that these changes to policy are not 'one or the other' to dispel these harmful connections.

## **Option 9 – Changes to the Residence Test**

We support the suggested changes to ensure that those who want to avail of the Scheme can, despite recent residency in Northern Ireland. We also note the importance of the Department adopting the 'ordinary' reading of 'residence' to be inclusive of asylum-seekers, who are not technically 'residents' under law.

We are concerned about permanent residents of Northern Ireland that do not have a permanent address. We urge the Department to apply any mitigations necessary to ensure that unhoused persons can benefit from this Scheme.

### **Option 10 – Proving Residency**

We support the proposed change to proving residency, particularly as it is more accessible for asylum-seekers and unhoused persons over 60 and/or with a disability. Alongside using letters from GPs as proof of permanent residency, we suggest that the Department consider using letters from the Housing Executive or homeless charities to ensure that those without a permanent home will not be excluded from this Scheme.

### ***The Budgetary Process and Gender Budgeting***

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 the 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 crisis<sup>9</sup>. 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 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

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<sup>9</sup> 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/>

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 place at the very end of the budget planning process or after the budget has been finalised. The OECD<sup>10</sup> 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.

Please see [Annex 1](#) for more on gender budgeting.

## ***Equality Obligations***

Including equality considerations in the budgets and policy-making process requires gender disaggregated data, departmental-specific and high-level equality objectives and monitoring structures. The lack of gender-disaggregated data hinders our ability to effectively advocate on behalf of women and leaves decision-makers with data that presents a false narrative – one where the diversity of experiences between women and men is unaccounted for and therefore absent in crucial policy and budgetary decisions.

We recommend that where gender-disaggregated data is available, it must be used to inform the decision-making process. Where there is no gender-disaggregated data, the Department needs to request that it is recorded. Having this information is key to completing the equality analysis required by Section 75. Without it, equality assessments do not capture the realities of existing inequalities and they lack the robust evidence needed to influence policy and budgets.

This assessment is required at the earliest opportunity in the policy-making process and as further decisions are made in finalising the policy, not only to inform Level 5 decision-makers about their policy's effects on equality, but to ensure the policy is both clear and transparent regarding the assessment of predicted impacts. It is essential that sufficient consideration of

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<sup>10</sup> OECD (2023), OECD Best Practices for Gender Budgeting, OECD Journal on Budgeting, vol. 23/1, <https://doi.org/10.1787/9574ed6f-en>.

gender inequality, paired with robust evidence, is reflected in this document to secure equality outcomes.

## ***Conclusion***

We reiterate the importance of gender budgeting tools like gender analysis and gender-disaggregated data collection in transforming the way in which decisions are made to promote gender equality, especially in the face of a budget crisis. We recommend that gender budgeting and gender analysis be incorporated into the Department's equality assessment process and that the Department builds capacity for gender and equality mainstreaming in the policy-making process. This would help provide the necessary analysis to demonstrate the full impact of the Department's proposed decisions, and highlight ways to mitigate these impacts. We would be pleased to meet with the Department to further discuss gender budgeting as a tool to address budgetary constraints and fulfil the Department's Section 75 requirements.



## ANNEX 1



### BRIEF ON GENDER BUDGETING

Budgetary processes and spend are far from 'neutral' – policies emanating from the Programme for Government and budgetary decisions have gendered consequences, whether they be intended or not. By taking a 'gender neutral' stance, decision-makers are oblivious to the complexities between the experiences of women and men and reinforce systemic disadvantages faced by women and other groups.

#### What is Gender Budgeting?

Gender budgeting is the tool that can help recognise systemic disadvantages and lead to budgets and policies that promote greater gender equality. If implemented, policy makers would consider the gendered impacts of spending and revenue raising decisions and how to use these mechanisms to bring about gender equality. Women's intersecting identities are also included in this analysis and policy makers are expected to promote these areas of equality as well.

In [Gender budgeting: Working paper 1](#), our partners Dr. Joan Ballantine, Dr. Michelle Rouse and Professor Ann Marie Gray highlight that, "*Northern Ireland lags significantly behind other devolved UK administrations and other OECD countries,*" where gender budgeting has "*made a significant contribution to addressing gender inequalities, the elimination of unequal outcomes and to increasing women's participation in civic and political life.*"<sup>11</sup>

It is important to note that gender budgeting is not about allocating more funds to women but about making sure the available resources have maximum impact. The [European Women's Lobby](#) breaks down the realities and misconceptions about gender budgeting as follows<sup>12</sup>:

#### **Gender budgeting is about:**

- *Including a gender perspective into budget planning and analysing budgets taking into account their impact on women and men, girls and boys.*
- *Introducing a gender perspective into the entire budget, including seemingly "gender-neutral" budget lines.*
- *Reprioritising and refocusing of spending and restructuring of taxation with a view to promote equality.*

#### **Gender budgeting is not about:**

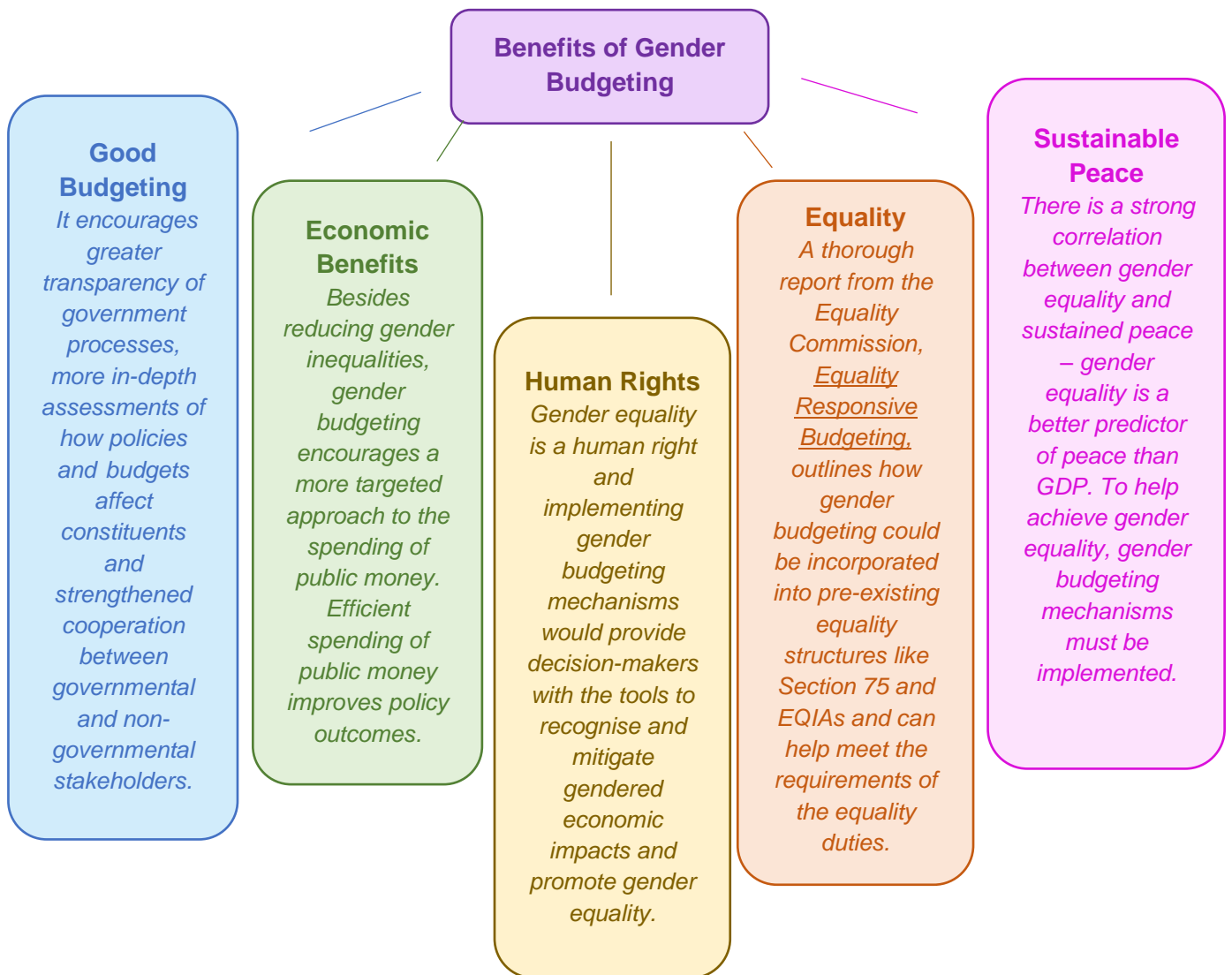
- *Creating separate budgets for women.*
- *Only looking at the parts of the budget which have a social content or that are explicitly gender-related.*
- *Demanding more spending.*

#### Why implement Gender Budgeting?

<sup>11</sup> Ballantine, J., Rouse, M. and Gray, A.M. (2021). *Gender Budgeting: Working Paper 1: What does the literature tell us? Lessons for Northern Ireland (NI)*. ([Gender Budgeting-1.pdf](#))

<sup>12</sup> European Women's Lobby. *What is Gender Budgeting?* ([What Is Gender Budgeting.pdf](#))

Gender budgeting is transformative, enhances transparency and accountability, and is of value in delivering economic benefits<sup>13</sup>, rights and equality<sup>14</sup>, and securing sustainable peace<sup>15</sup>.



<sup>13</sup> Himmelweit, S. (2002). 'Making visible the hidden economy: the case for gender-impact analysis of economic policy,' *Feminist Economics*. 8 (1), 49-70.

<sup>14</sup> Quinn, S. (2013). *Equality responsive budgeting*. ([Equality Responsive Budgeting \(equalityni.org\)](http://equalityni.org))

<sup>15</sup> Fernanda Espinosa, M. (2020). *Peace Is Synonymous With Women's Rights*. (<https://www.un.org/en/un-chronicle/peace-synonymous-women%E2%80%99s-rights>)