

## Appendix D

### Background Information - Administering Eligibility

#### 1.0 Government Guidance on Eligibility Criteria

- 1.1 The Department for Transport (DfT) provides guidance to Local Authorities / Travel Concession Authorities (TCAs) in administering the English National Concessionary Travel Scheme (ENCTS), including assessing resident's eligibility for an Access Pass as part of the managing the overall scheme. Eligibility for an access pass can be granted either through the "automatic" criteria outlined below or "non-automatic" which is subject to requiring further assessment.
- 1.2 Eligibility for a concessionary travel access pass may be considered "automatic" (not requiring further assessment) where a person is in receipt of one of the following state benefits, which link eligibility to receive the benefit to the ability to walk or, in the case of PIP, to communicate orally, provided that the person is of fare paying age and that the award of the benefit has been for at least 12 months or is expected to be for at least 12 months:
  - a. Higher Rate Mobility Component of Disability Living Allowance (HRMCDLA);
  - b. Personal Independence Payment (PIP), where the applicant has been awarded at least eight points against either the PIP "Moving around" and/or "Communicating verbally" activities;
  - c. War Pensioner's Mobility Supplement (WPMS).
- 1.3 If an applicant is 'non- automatic' and requiring further assessment there are seven categories of disabled person identified as eligible for concessionary bus travel which they can be assessed against. Under the legislation, an eligible disabled person is someone who:
  - a. Is blind or partially sighted
  - b. Is profoundly or severely deaf
  - c. Is without speech
  - d. Has a disability, or has suffered an injury, which has a substantial and long-term adverse effect on his ability to walk
  - e. Does not have arms or has long-term loss of the use of both arms
  - f. Has a learning disability, that is, a state of arrested or incomplete development of mind which includes significant impairment of intelligence and social functioning"
  - g. Would, if applied for the grant of a licence to drive a motor vehicle under Part III of the Road Traffic Act 1988, have their application refused pursuant to section 92 of the Act (physical fitness) otherwise than on the ground of persistent misuse of drugs or alcohol.
- 1.4 The DfT recommends that when a local authority issues a concessionary travel pass to an eligible disabled person, the authority keep a record of the particular category of disability under which a person qualifies (as well as details of how the assessment was carried out and by whom if applicable).

- 1.5 The Department also recommends that independent health professionals should undertake assessments in place of GPs. In the case of assessment of the inability to walk, for example, occupational therapists or physiotherapists are often best placed to assess eligibility due to their professional knowledge of mobility. It is suggested that transferring assessment to such specialists implicitly suggests the importance of making judgements based on physical mobility rather than medical conditions.

## **2.0 Reading Borough Council - Current Process**

- 2.1 The Council currently has a single application form for both Older Person's and Disabled Person's (Access) concessionary bus passes. When completing and submitting the application form, applicants are required to provide a proof of identification and residency and for the Access Pass applicants are automatically eligible if they meet one of the following criteria and provide the appropriate evidence dated within the previous 12 months:

- Are in receipt of the High Rate Mobility Component of the Disability Living Allowance and provides a current award notice letter from the DWP (Department of Works & Pensions).
- Are in receipt of a Personal Independence Payment (PIP) and scores at least 8 points under the classifications of "Moving Around" or "Communicating Verbally" and provides a current award notice letter from the DWP.
- Are in receipt of the War Pensioners Mobility Supplement (requiring evidence of an award letter from the Service Personnel and Veterans Agency).
- Have been issued with a disabled persons' parking badge by a Berkshire authority (requiring evidence of a valid Blue Badge).
- Are sight impaired, either blind or partially sighted (requiring evidence of a Certificate of Vision Impairment).
- Are profoundly or severely deaf (the applicant must be registered with the local authority social services department, or able to supply a report from an aural specialist).

- 2.2 Where the applicant does not meet any of the above criteria, eligibility may also be granted if the applicant meets any of the following criteria and this is certified by a medical professional:

- Is without speech, in any language.
- Has a disability, or has suffered an injury, which has a substantial and long term adverse effect on their ability to walk.
- Does not have arms or has long-term loss of the use of both arms.
- Has a learning disability, that is, a state of arrested or incomplete development of mind which includes significant impairment of intelligence and social functioning.
- Would be refused a license to drive a motor vehicle, on grounds other than persistent misuse of drugs or alcohol.

- 2.3 Where the applicant is unable to travel without the aid of a companion then 'Companion' entitlement may be granted and this also needs to be certified by a medical professional.

- 2.4 The Council's current application form requires applicants who are applying under the automatic criteria to supply appropriate evidence to support their application from the documentation listed. Where applicants are applying 'subject to further assessment' they are required to provide support from a qualified medical professional, usually the applicants GP. This is in the form of an official stamp along with date and signature having selected one of the options 1 to 5 above. For an applicant to also be issued the Companion entitlement the medical professional needs to also confirm by tick box that the 'Applicant requires companion Entitlement'.
- 2.5 The Council's current process does not require the use of independent health professionals such as occupational therapists or physiotherapists. This is due to the additional costs involved in using independent health professionals to assess applications either through employing additional staff directly, or contracting a Mobility Assessment company to provide these services for the Council.
- 2.6 The Council currently has approx. 22,000 Older Person's Bus Passes and 6,000 Disabled Person's Bus Passes (including those with Companion entitlement). The passes are issued with a 5 year expiry date on, in line with the legislation. The expiry dates are staggered to avoid all of the passes to be reissued at the same time, given the significant resources pressure this would put on the Council. On expiry, passes are reissued automatically by a new pass being posted to existing pass holders and any returns are removed from the system.
- 2.7 Under the terms of the ENCTS scheme, pass holders are required to inform the Council if their circumstances change and they are no longer eligible for the scheme, for instance if they move and are no longer resident of Reading borough or their circumstances change and they no longer meet the eligibility criteria for an Access Pass. In these circumstances passes are deactivated and can no longer be used by pass holders. The database is also regularly updated as the Council is informed if a pass holder has moved out of the borough or has deceased.
- 2.8 The current renewal process does not require Access Pass holders or those with the Companion entitlement to re-confirm their eligibility for the scheme as they would do for a Blue Badge, which has only a 3 year life span. For some of the eligibility criteria there is likely to be no change in the condition (e.g for severely sight impaired, profoundly deaf etc...), however for some categories the condition can change or improve or is related to a time limited state benefit such as Higher Rate Mobility Component or Personal Independence Payments.
- 2.9 It is also the case that where pass holders are required to re-apply and reconfirm their eligibility there is an element of 'self-assessment' where pass holders who may no longer consider themselves to be eligible do not re-apply.

### **3.0 Reading Borough Council - Review of Current Process**

- 3.1 An internal review of the current process for assessing the eligibility of applications for Access Passes is currently being undertaken by the Council, to ensure the process provides value for money in line with government guidance.
- 3.2 Recommendations could include, for instance, the use of GP endorsement to be retained as this is common practice among local authorities; however the application form could be strengthened to require more information from the

medical professionals to confirm and applicants eligibility. Coordination with the Blue Badge application process is also being undertaken to consider whether there are elements of this that can be combined with the Access Pass process.

- 3.3 In addition, the renewal procedure could be amended to require pass holders to renew their eligibility for the scheme at the end of the 5 year lifespan of their pass. However, such a review will be sensitive to those pass holders who have a permanent disability (for instance blind or partially sighted). Where applicants have had their pass renewed due to loss, damage or theft with a later expiry date, their eligibility is reviewed in line with the original pass' expiry date.