**Date issued:** 24rd of May 2023

**Freedom of Information Request** 62/23

We are writing in response to your Freedom of Information request. Your request has been considered in accordance with the requirements of the Freedom of Information Act and our Data and Information Management Policy.

**You asked for the following information:**

**RESPONSE**

1. **There have been changes in the way bus pass eligibility is being decided. What are these changes?**

The scheme is unchanged from that established and run by Welsh Government and the Local Authorities.

1. **How have these changes been decided and what is the rationale behind making changes to the decisions about how bus passes are being issued?**

No changes have been made to the scheme but, since Transport for Wales started administering the scheme on behalf of the Welsh Government and Local Authorities, the DWP has changed all customers on DLA and moved them over to PIP. This is why TfW now requires PIP documents and only accepts DLA letters for minors who receive a higher mobility rate.

1. **Could you please let us know how many applications for bus passes/renewals you received each month for the last 18 months?**

**3.1 How many of these applications were rejected?**

The following data shows how many new concessionary card applications we have had each month since January 2022 and how many of those applications were rejected. The figures relate to all concessionary card applications.

|  |  |  |  |
| --- | --- | --- | --- |
|  | **Total New Applications** | **Total of Rejected Applications** | **Rejection Percentage %** |
| **January 2022** | 4070 | 1900 | 47% |
| **February 2022** | 3400 | 1090 | 32% |
| **March 2022** | 4070 | 1520 | 37% |
| **April 2022** | 3540 | 1180 | 33% |
| **May 2022** | 4350 | 1690 | 39% |
| **June 2022** | 5062 | 1891 | 37% |
| **July 2022** | 3979 | 1548 | 39% |
| **August 2022** | 5151 | 1882 | 37% |
| **September 2022** | 4268 | 1605 | 38% |
| **October 2022** | 4473 | 1674 | 37% |
| **November 2022** | 3615 | 1223 | 34% |
| **December 2022** | 3038 | 1085 | 36% |
| **January 2023** | 4382 | 1572 | 36% |
| **February 2023** | 4750 | 1851 | 39% |
| **March 2023** | 6145 | 2088 | 34% |
| **April 2023**  **(Up until w/c 24/04)** | 3044 | 1053 | 35% |

* 1. **How many of the rejected applications were granted after appeal?**

Transport for Wales operates the Concessionary Card scheme on behalf of the Welsh Government and the 22 Local Authorities in Wales.  When an applicant does not meet the criteria set out in the application guidance, their application cannot be approved by TfW. There isn’t a defined appeals process, however, customers can provide us with supporting evidence (e.g. doctor’s letter, DVLA license revoke letter) which is then passed on to their Local Authority to be assessed.

1. **How many eligibility review letters have been sent out to people more than 18 months before their passes were set to expire?**

None. Initial disability review letters are to be sent out 4 weeks prior to the review date. However, all cards continue to work throughout the disability review process which can take 8 to 10 weeks.

We currently have 3194 customers in review with TfW and 1180 reviews sat with the Local Authorities. TfW has February and March reviews open and they will be completed soon.

* 1. **How many of those requests were then denied?**

We do not hold this information.

* 1. **Of those denied, how many were granted on appeal?**

There is no appeal process.

1. **In the concessionary bus travel scheme guidance available on your website, you write that “state benefit” entitlements are one way to check for eligibility but that other form of evidence can be used. We have anecdotal evidence that people are now being denied bus passes because they do not have enough points on their PIP assessments. Other evidence is not being accepted anymore.**

It does not state on the website that we accept state benefit letters as proof of eligibility. However, we do accept state benefit letters as proof of address.

**5.1 Could you please confirm whether there has been a change in policy and if there has been, why the guidance has not been updated?**

There has been no change in policy and the guidance on the website is up to date.

* 1. **If there has not been an official change in policy, could you please explain why other evidence is not being accepted anymore?**

Other evidence can be provided by customers, as per guidance on the website.

As previously stated, Transport for Wales operates the Concessionary Card scheme on behalf of Welsh Government and the 22 Local Authorities in Wales.  When an applicant does not meet the criteria set out in the application guidance their application cannot be approved by TfW. However, their application can then be passed on to the Local Authority to be determine whether a customer’s application is to accepted or rejected.

1. **The guidance claims that the bus pass system is based on a social model of disability framework. The endorsement is line with broader Welsh government policy. Could you explain to us how relying on PIP assessments makes sense from a social model perspective? The DWP has been consistently criticised by disability groups and Equality & Human Rights Commission for violating disabled people’s human rights through unfair assessments. Could you outline rationale in relying more heavily on DWP assessments regardless?**

Transport for Wales operates the Concessionary Card scheme on behalf of Welsh Government and the 22 Local Authorities in Wales. We do not set the policy or the eligibility criteria.

1. **We are aware that several groups and individuals have raised this issue with you before. Please elaborate on what steps you have already undertaken to resolve these issues.**

Transport for Wales is committed to making the concessionary card application approvals process as easy as possible for all applicants. We have a complaints procedure in place, and we respond to all complaints in a timely manner. All customers are treated fairly and with a consistent approach, in line with government guidance. We take on board feedback from applicants and regularly update our processes and staff training to improve our service provision.

However, we do not have discretion over eligibility criteria and approvals.

We are unable to elaborate on what steps we have undertaken ‘to resolve these issues’ without knowing what issues have been raised.

**Do you have stats on disabled applications and disabled rejections, please?**

There is no way to obtain statistics on how many disabled applications or rejections we have received. This is because the data captures numbers of application reviews and does not distinguish between over 60’s and disabled applications.

**Could one application result in multiple rejections or if someone keeps submitting incomplete info does it count as an application and a rejection each time?**

An application can only be rejected once.

**Do you know how many are currently in the system for LA review? Do they go back beyond Feb/Mar?**

There are currently 1174 Disabled and 11,974 applies to Disabled Companion card applications in the system for LA review at present. These go back beyond Feb/March.

All Disabled Companion application approvals are undertaken by LAs.

The 1174 Disabled reviews for LA reviews are for applications that TfW cannot approve as they do not meet the stated eligibility criteria and therefore have to be individually assessed by the relevant LA.

We hope this information is of use to you.

Yours sincerely,

**Transport for Wales**

**Appeal Rights**

If you are unhappy with the way your request has been handled and wish to make a complaint or request a review of our decision, please write to the Head of Freedom of Information at either Transport for Wales, 3 Llys Cdwyn, Pontypridd, CF37 4TH or [freedomofinformation@tfw.wales](mailto:freedomofinformation@tfw.wales). Your request must be submitted within 40 working days of receipt of this letter. If you are not content with the outcome of the internal review, you have the right to apply directly to the Information Commissioner for a decision.

The Information Commissioner (ICO) can be contacted at Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF or you can contact the ICO through the 'Make a Complaint' section of their website on this link: <https://ico.org.uk/make-a-complaint/>

The relevant section to select will be "Official or Public Information".