



Department
for Transport

Concessionary Travel Covid-19 Recovery Strategy

Consultation: call for evidence

July 2021

Department for Transport
Great Minster House
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Introduction

The English National Concessionary Travel Scheme

- 1.1 A statutory bus concession for older and disabled people has been in place since 2001. In 2008, the scheme extended the provision of free bus travel within individual local authorities to allow travel between 0930 and 2300 to older and disabled people anywhere in England. This statutory concession is referred to as the English National Concessionary Travel Scheme ('ENCTS'). Since April 2010, the eligibility age has been tied to the State Pension age for women. The pensionable age for men and women is currently 66.
- 1.2 The statutory bus concession is administered locally by Travel Concession Authorities ('TCAs'). The following authorities are TCAs: County Councils, Unitary Authorities, Passenger Transport Executives, and London Boroughs.
- 1.3 TCAs have the option to introduce 'discretionary' concessions, such as expanding the scheme eligibility to other groups, such as young people, and apprentices, or extending the time of availability. The funding for these schemes comes from the TCAs' budget and in accordance with their local priorities.
- 1.4 Provision for travel concessions in England is at present contained in five separate pieces of primary legislation: the Transport Act 1985, the Greater London Authority Act 1999, the Transport Act 2000, the Travel Concession (Eligibility) Act 2002 and the Concessionary Bus Travel Act 2007. The reimbursement of bus operators by TCAs for carrying concessionary passengers is governed by European regulation No 1370/2007 (as it has been retained in UK law) as well as other domestic legislation.
- 1.5 TCAs and Bus Operators should also note the provisions of the Travel Concession Schemes Regulations 1986 (under the Transport Act 1985) and the Mandatory Travel Concession (England) Regulations 2011 (under the Transport Act 2000). Both sets of regulations set out the framework for reimbursement arrangements and the appeal process.
- 1.6 The ENCTS for England costs around £1 billion per year. The scheme is intended to address social concerns regarding the cost of travel and accessibility amongst older and disabled people. The benefits of the scheme include consumer benefits, net effect on congestion and greenhouse gas emissions, and increased tax revenue to the Treasury. The core benefit is the value users place on free travel to enable access opportunities to socialise, use local services, providing vulnerable people with access to healthcare and other essential services, allowing them to stay active and avoid isolation.
- 1.7 Funding for the ENCTS is provided by the Ministry of Housing, Communities and Local Government ('MHCLG') as part of their Revenue Support Grant.

National Bus Strategy commitments

- 1.8 The National Bus Strategy '[Bus Back Better](#)' was published 15 March 2021, which set out a vision to deliver better bus services across England. As part of the National Bus Strategy, we committed to *'a review of the current appeals process, reimbursement guidance and, by extension, the reimbursement calculator, following the impact of Covid-19 on travel patterns.'* We also confirmed we would look to *'develop how best we can re-establish the link between concessionary journeys and concessionary fare payments.'*
- 1.9 **Therefore, as part of this consultation, we are requesting your feedback on the current challenges of the reimbursement guidance, calculator and appeals process, and what you believe needs to be done to address these challenges. A list of the questions to respond to can be found within Annex A of this document.**

Reimbursement Guidance & Calculator

- 1.10 TCAs have a statutory duty to provide people who have reached State Pension Age and those with eligible disabilities with free, off-peak concessionary travel, and are legally required to reimburse bus operators who carry concessionary passengers.
- 1.11 DfT provides [guidance](#) to TCAs on reimbursing bus operators, and is designed to provide pragmatic advice on calculating appropriate reimbursement for bus operators. It applies only to England (including London for the purposes of reimbursement of non-London Bus Network Services).
- 1.12 The underlying principle which underpins reimbursement is (ordinarily – see paragraph 1.54) to leave operators **"no better and no worse off"** as a result of the concessionary travel schemes. This implies that TCAs should reimburse operators for:
- **The revenue forgone:** this is the revenue operators would have received from those concessionary passengers who would otherwise have travelled and paid for a (full fare or discounted) ticket in the absence of the scheme. The average fare forgone needs to be calculated, accounting for the fare structure of the operator. Given that the bus user is a rational and informed economic agent seeking the cheapest fare per journey, without the concessionary travel pass, the bus user would have considered the frequency of his/her bus use when purchasing the ticket (single, daily, weekly).
 - **Net additional costs:** these are the additional costs they (operators) have incurred as a result of the scheme. For example, this could include the cost of carrying additional generated passengers (i.e. concessionary passholders that would not have travelled in the absence of the scheme) or other costs that would not have been incurred in the absence of the concession such as scheme administration costs. These also account for the marginal operating and capacity costs, the peak vehicle requirement costs.

DfT's recommended method of calculating reimbursement

- 1.13 The guidance recommends using the [concessionary calculator](#), which follows the above principles. TCAs and operators are not discouraged from using their own approaches, so long as these are agreed upon by the parties and follow the legal requirements and principles.
- 1.14 The guidance does not mandate operators and TCAs to use our methodology. The pros are that it gives flexibility and freedom to use the methods that best fit the local necessities. The cons are that it can cause a dispute between TCAs and operators.

Formulas

- **Total Reimbursement Due** = Revenue Forgone + Net Additional Costs
- **Revenue Forgone** = Non-generated journeys x Average fare that would have been paid
- **Net Additional costs** = Generated journeys x Marginal costs + Peak Vehicle Requirement costs + Scheme administration costs

1.15 Concessionary fare reimbursement is made up of full "revenue foregone" for those passengers who would have travelled in the absence of a concession, and "additional costs" to cover the marginal extra cost of carrying passengers who only travel because of the concession, other costs associated with implementing the concession, and costs associated with an increase in capacity demonstrated to result as a direct consequence of the concession.

1.16 One of the advantages of the calculator is that it is easily accessible and does not require a huge amount of data to calculate the total reimbursement. However, some default values and evidence might not be up to date. Additionally, the impact of Covid-19 on travel patterns may mean the current calculator may no longer be fit for purpose. For instance:

- **Reimbursement Factor:** The reimbursement calculator uses demand data from 2005/06, which may no longer be appropriate, for several reasons:
 - Bus fares have increased since 2005/06, which would have caused a drop in bus passengers in the absence of the scheme. As concessionary pass holders do not face this increase, they still use the bus, meaning an increase in generated journeys.
 - However, Covid-19 has driven concessionary patronage down, and may continue to affect patronage immediately post-Covid-19. It is expected that generated passengers with other means of transport would have been the first to fall away, resulting in an increase in non-generated journeys.
- Both these situations would have an impact on the split between generated and non-generated journeys.
- **Average Fare:** The observed concessionary passholders journey frequencies evidence used to derive the discount factor in the fare method may be out of date. Newer technologies, such as the smart ticketing, have tended to alter the manner of executing processes, and cost indices used to adjust them may no longer reflect the

balance of the current situation. Ticketing methods have changed in that time, with an impact on management costs, and this evidence could be updated. Covid-19 has also changed journey patterns, and these may not stabilise for some time. This would have an impact on the split between generated and non-generated journeys and the average fare forgone.

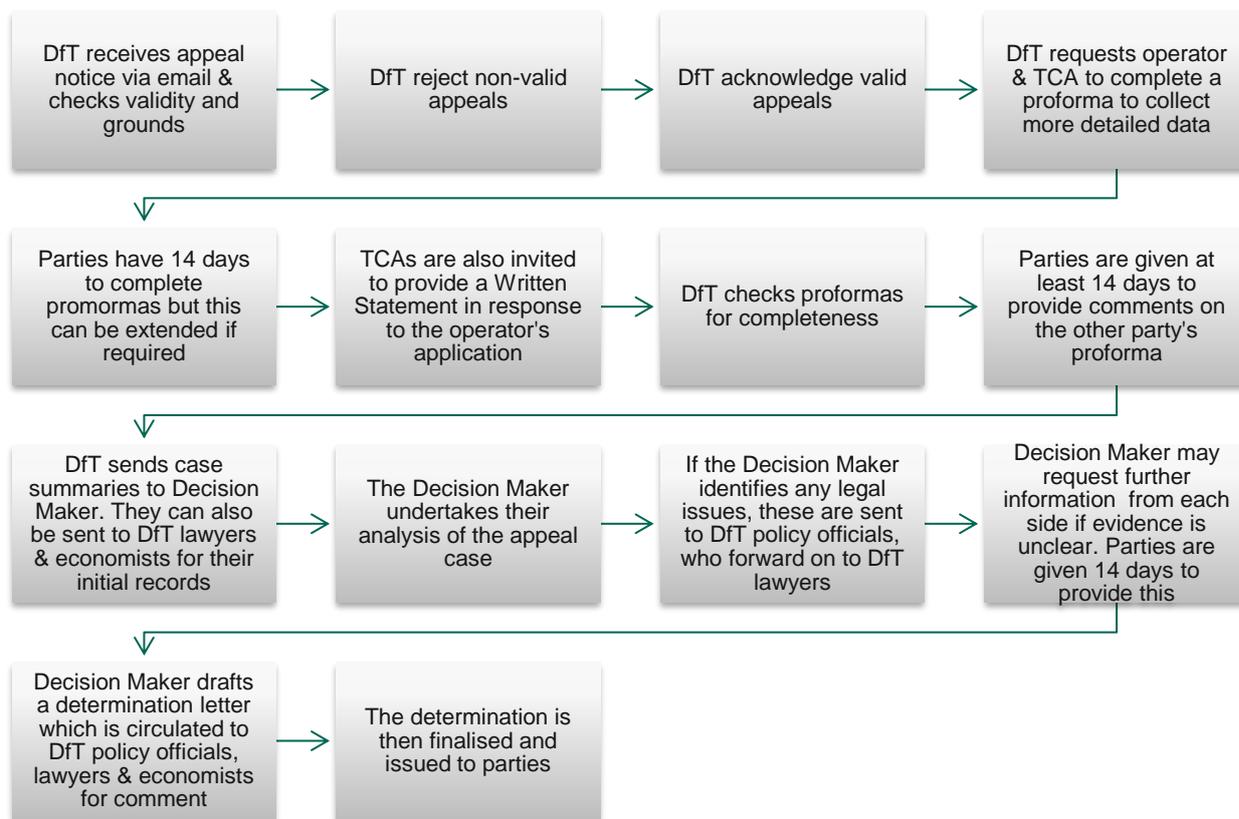
- **Marginal Costs:** The default values for marginal costs might have suffered changes after 16 years and new evidence could be used. Additionally, the impact of Covid-19 could result in additional marginal costs claims that were not apparent pre-pandemic. These would have an impact on the marginal values that the calculator uses to reimburse the generated journeys.

1.17 We welcome views on the challenges arising from the current reimbursement guidance and calculator, and what needs to be done to address these challenges. Please refer to Annex A in order to provide feedback on the same.

Applications to the Secretary of State- ‘appeals process’

- 1.18 The objective of reimbursement is (ordinarily – see paragraph 1.54) that the operator should be left “*no better or worse off*” as a result of providing the concession. This ensures that operators are fully compensated for the service they provide but do not receive any hidden subsidy. Any such subsidy could breach subsidy control rules.
- 1.19 Each year bus operators and TCAs negotiate the terms of paying concessionary reimbursement for the financial year ahead, and if they fail to agree they can lodge a statutory appeal to the Secretary of State.
- 1.20 In determining appeals by bus operators, the Secretary of State (or decision makers appointed on his behalf) will apply the law relating to the compensation of operators. The Secretary of State will be guided by the DfT reimbursement guidance but will also consider any additional evidence brought forward by parties when determining appeals.
- 1.21 The right of appeal is enshrined in primary legislation. Operators lodging appeals about discretionary concessions base their application on the Travel Concession Schemes Regulations 1986 and those lodging appeals about the mandatory concession base their application on The Mandatory Travel Concession (England) Regulations 2011. They may combine both elements in one Notice of Appeal as long as the grounds of appeal are clear.
- 1.22 They must lodge their application within deadlines set out by the Regulations, in accordance with DfT [guidance](#). For the mandatory concession this is 56 days from the date the arrangements came into effect. Schemes usually take effect from 1 April each year so the application deadline is 27 May.

Appeal Process



1.23 The current appeals system represents a low risk, low cost, with a high potential of return for operators in securing additional funding from TCAs, however the process may cause high administrative burdens to both parties. The decision maker can decide in favour of either party – so either party may be made to pay money, despite appealing that it is owed money. Appeals can sometimes damage relationships with TCAs, which could be problematic in the context of Bus Service Improvement Partnerships for developing sustainable post-pandemic networks.

1.24 Some operators may ask for the case to be on hold ('stay of appeal') as they are still negotiating with the TCA – it is possible that some of these cases will be withdrawn. In the past, DfT has taken a pragmatic approach by granting extensions as requested and avoiding setting deadlines. This increases the length of the appeals process and can create uncertainty between parties. However, there is a risk that if a firmer position is taken, there may be fewer negotiated appeal outcomes.

1.25 In circumstances where the guidance is clear and effective, practice is well established, and appeals are unnecessary. However, where guidance is unclear, for instance the current approach in determining the reimbursement factor, it can give rise to appeals and lead to conflict between TCAs and operators.

Appeals throughout Covid-19

1.26 DfT is aware that it is considered normal practice for various operators to appeal. Although legislation allows operators to appeal, DfT continues to encourage operators to take a pragmatic approach to such appeals, whilst TCAs continue to provide funding at pre-Covid levels.

- 1.27 **We welcome views on the challenges arising from the current appeals process, and what needs to be done to address these issues. Please refer to Annex A to provide feedback on the same.**

Covid-19 response

- 1.28 Since March 2020, DfT asked TCAs to pay out concessionary fare funding at pre-COVID levels. Following the expiration of PPN04/20, on 20 November 2020, DfT provided TCAs with supplementary concessionary guidance, which reinforced DfT's request for concessionary reimbursement payments to continue to be paid by TCAs to bus operators at pre-Covid levels.
- 1.29 DfT remains grateful to those authorities that have continued to maintain concessionary reimbursement payments at pre-COVID levels to bus operators. Combined with funding from DfT, this support has worked together to ensure the continued operation of local bus services across the country.

Approach to calculating "pre-Covid levels"

- 1.30 In line with feedback from TCAs, DfT has not prescribed an approach for TCAs to calculate pre-Covid level reimbursement payments to operators. DfT instead confirmed that the term 'pre-COVID levels' should be agreed between TCAs and bus operators. By TCAs and operators agreeing funding, routes and service levels between themselves, they are also essentially defining what pre-Covid levels mean locally. DfT have applied this logic for the duration of the provision of funding pursuant to the Covid-19 Bus Services Support Grant ('CBSSG'), and this will continue throughout the recovery period.
- 1.31 DfT recognises that concessionary reimbursement payments are an essential part of bus funding, whilst also being a significant share of wider local authority funding. This is why, within the supplementary concessionary guidance, DfT suggested TCAs to determine pre-Covid concessionary fare reimbursement payments by reference to the **level of service** (as opposed to concessionary patronage levels) that operators are providing them with, should an operator's service levels drop below those provided at pre-Covid levels. For instance, if an operator was providing 70% of service levels, TCAs could reduce concessionary fare payments to 70%.

Funding breakdown

- 1.32 Throughout Covid-19, DfT has maintained the Bus Service Operator Grant ('BSOG') payments to bus operators and TCAs at pre-Covid levels. The BSOG and concessionary fare reimbursement payments that operators receive, have created the first tranche of funding for operators during Covid-19. The budgets for the CBSSG Restart scheme and Recovery funding, including the Local Transport Authority (LTA) component, have been calculated on the basis that these concessionary reimbursement payments at pre-Covid levels continue to be made, and is therefore dependant on these payments continuing at these levels.
- 1.33 Any reduction TCAs make in their payment of concessionary fare payments will increase the burden on CBSSG Restart, and the Recovery funding package.

Understandably, TCAs are unwilling to bear this cost indefinitely and require a clear plan to transition from reimbursing operators at pre-Covid levels back down to paying them in line with actual patronage levels.

- 1.34 DfT has recently announced CBSSG Restart funding will cease, with the eight-week notice period ending on 31 August 2021. Recovery funding period will then begin on 1 September 2021, while BSOG will return to being paid out at actual levels.
- 1.35 As with CBSSG Restart, Recovery funding will top up BSOG and concessionary fare payments to make up the package of funding from the public sector. Should any of these payments from the public sector reduce, there is a risk that bus services will reduce if the recovery funding budget is insufficient to meet the losses made by operators.

Maintaining concessionary payments at pre-Covid levels until the end of the financial year

- 1.36 DfT will continue to ask TCAs to pay out concessionary fare payments to bus operators at pre-Covid levels until the end of the financial year (5 April 2022). This will allow those TCAs who have already budgeted to pay out concessionary payments at pre-Covid levels for the rest of the financial year to do so.
- 1.37 By implementing a concessionary recovery strategy at the start of the next financial year, DfT will be able to provide TCAs with sufficient time to respond to this consultation fully, providing increased quality of information and feedback. DfT are conscious that Local Transport Authorities (LTAs) may have limited resource to engage in a short consultation, (which would be required should concessionary recovery begin at the same time as the wider Recovery funding), due to their current engagements on additional National Bus Strategy requests. DfT therefore want to avoid putting TCAs under unnecessary pressure to respond to and implement a recovery strategy mid-way through the financial year.
- 1.38 Although it is unlikely that patronage will return to pre-Covid levels in the very near term, there is an indication that patronage levels will have increased by the end of this financial year, thereby reducing the amount of time the phased recovery period will take.

Concessionary fares funding recovery

- 1.39 DfT proposes to introduce a phased approach or a 'sliding scale' for the transition back down to actual concessionary patronage levels.
- 1.40 Each month DfT would set the percentage of pre-Covid concessionary payments we ask TCAs to pay out to operators. Simultaneously, we anticipate actual patronage levels to increase, resulting in the sliding scale and patronage levels eventually meeting.
- 1.41 This approach would have the advantage of being able to both reduce the percentage of pre-Covid payments and move further down to actual concessionary patronage levels, whilst, if needed, slide back up the scale and increase the percentage of pre-Covid payments levels required, should the situation require it.

1.42 This sliding scale would create flexibility for DfT to slow the pace of change to meet circumstances. For instance, should another lockdown occur, and patronage or service levels drop, we can 'slide back up the scale' to increase the percentage of pre-Covid levels that we expect TCAs to pay out to operators. Additionally, there would also be an opportunity to speed up the slide down the scale, if required.

Phased recovery approach

- 1.43 Our approach begins by assuming that some TCAs still continue to pay out concessionary reimbursement payments at 100% of pre-Covid levels. At the start of the financial year, we propose allowing TCAs to begin concessionary travel recovery by reducing their reimbursement payments down to 90% of pre-Covid levels, which would be the 'baseline'.
- 1.44 Each month, dependant on circumstances previously mentioned, we would aim to permit TCAs to reduce this baseline by 5%, to allow for a slow transition down to actual levels. At the same time, we anticipate that actual patronage levels would increase over the months, largely due to the continued roll out of the Government's vaccination programme. This would mean that the sliding scale and actual levels should eventually meet somewhere in the middle.
- 1.45 At the beginning of the recovery period, when we reduce the pre-Covid reimbursement baseline to 90%, should a TCA have already reduced their pre-Covid levels (to, for example, 70% as a consequence of an operator's service levels dropping to 70% of their pre-Covid rate), this percentage baseline reduction would not affect this particular TCA. This is because TCAs will not be required to pay for this level of service at the 90% rate, if 90% of pre-Covid service levels are not being provided. The TCA should therefore continue to pay out concessionary reimbursement at 70% (i.e. matching with the operator's service levels).
- 1.46 However, should the operator's service levels increase to say 80%, the TCA should increase the amount of concessionary reimbursement payment to 80% of pre-Covid levels. Once the pre-Covid reimbursement baseline (set by DfT) has slowly reduced until it matches the amount of reimbursement payment a TCA is paying out to operators, they may then begin to reduce their payments in line with the sliding scale of the baseline.
- 1.47 A sliding scale would aim to encourage TCAs to continue to pay the level of pre-Covid reimbursement payments we set, which will create a base for any subsidy we provide, such as CBSSG or recovery funding. Our approach will aim to ensure TCAs would not pay any less than the set percentage of pre-Covid levels, unless a reduction is in line with an operator's service levels. A TCA would also be able to pay more than the baseline, if they chose to do so.
- 1.48 The phased recovery approach would aim to be sufficiently attractive to TCAs whilst also balancing the need to provide funding to bus operators while patronage is still repressed.
- 1.49 This would also provide a more consistent approach for operators throughout the country, as operators covering different TCAs would have a baseline for the percentage of pre-Covid reimbursement payments they will receive, depending on their service levels. They would not have this baseline if TCAs independently approached

the recovery phase differently, which would have the potential to result in TCA capability and consistency issues.

Subsidy Control

- 1.50 In providing reimbursements to operators, TCAs will need to take account of and comply with subsidy control rules. TCAs will need to keep the current position under review as the circumstances evolve.
- 1.51 **We welcome views on the government’s proposal, outlined above, to implement a phased concessionary travel recovery strategy from 6 April 2022. Please refer to Annex A to provide feedback on the same.**

Addressing TCA Legal Risk of Overpayment

- 1.52 TCAs informed us that they were concerned that, in order to comply with DfT’s ask to pay concessionary fares funding at pre-Covid levels rather than actual journeys, they were in breach of Regulation 6 of the Mandatory Travel Concession (England) Regulations 2011, which states that:
- “It must be an objective of a travel concession authority when formulating reimbursement arrangements for an operator to provide that such operator—
(a)is financially no better and no worse off as a result of providing a concession”*
- 1.53 As payments at pre-Covid levels are higher than if payment was made based on actual journeys taken it could be argued operators are financially “better off” by providing a concession.
- 1.54 To address this, DfT laid an SI on 23 March 2021, to temporarily change the legislation to allow the payments to continue. This SI allows TCAs to, in principle, pay concessionary fares funding to operators at a higher level than due through actual journeys by pass-holders. However, implementation remains at the discretion of each TCA, and TCAs need to take account of subsidy control rules in determining what level of concessionary fares to pay. The amendment will cease to have effect at the end of the 2021/22 financial year.
- 1.55 However, should the phased concessionary travel recovery process begin at the beginning of the next financial year (2022/23), it is likely that DfT would need to lay a further SI, to achieve the continued provision of enabling TCAs to, in principle, make pre-Covid level payments, during the new proposed recovery period of concessionary travel.

How to respond

The call to evidence period began on 27 July 2021 and will run until 22 September 2021.

You can respond to this call to evidence using the online form, which can be accessed using the following link: <https://www.smartsurvey.co.uk/s/0ESISQ/>

Please ensure that your response reaches us before the closing date. If you would like further copies of this consultation document or require alternative formats (Braille, audio CD, etc.), please contact concessionaryfares@dft.gov.uk.

When responding, please state whether you are responding as an individual or representing the views of an organisation. If responding on behalf of a larger organisation, please make it clear who the organisation represents and, where applicable, how the views of members were assembled.

If you have any suggestions of others who may wish to be involved in this process please contact us.

Freedom of Information

Information provided in response to this consultation, including personal information, may be subject to publication or disclosure in accordance with the Freedom of Information Act 2000 (FOIA) or the Environmental Information Regulations 2004.

If you want information that you provide to be treated as confidential, please be aware that, under the FOIA, there is a statutory Code of Practice with which public authorities must comply and which deals, amongst other things, with obligations of confidence.

In view of this it would be helpful if you could explain to us why you regard the information you have provided as confidential. If we receive a request for disclosure of the information, we will take full account of your explanation, but we cannot give an assurance that confidentiality can be maintained in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on the Department.

The Department will process your personal data in accordance with the Data Protection Act (DPA) and in the majority of circumstances this will mean that your personal data will not be disclosed to third parties.

Confidentiality and data protection

The Department for Transport (DfT) is carrying out this consultation to gather evidence on the proposed concessionary travel recovery strategy and consideration on the current challenges surrounding the concessionary reimbursement guidance and reimbursement calculator, and the applications to the Secretary of State guidance. This consultation and the processing of personal data that it entails is necessary for the exercise of our functions as a government department. If your answers contain any information that allows you to be identified, DfT will, under data protection law, be the Controller for this information.

As part of this consultation, we're asking for your name and email address. This is in case we need to ask you follow-up questions about any of your responses. You do not have to give us this personal information. If you do provide it, we will use it only for the purpose of asking follow-up questions.

Your consultation response and the processing of personal data that it entails is necessary for the exercise of our functions as a government department. DfT will, under data protection law, be the controller for this information. [DfT's privacy policy \(opens in new window\)](#) has more information about your rights in relation to your personal data, how to complain and how to contact the Data Protection Officer.

Any information you provide will be kept securely and destroyed within 12 months after the closing date. Any information provided through the online questionnaire will be moved to our internal systems within 2 months of the consultation period end date.

What will happen next

A summary of responses, including the next steps, will be used to inform creation of the Recovery Guidance which will be published within three months of the consultation closing. It will also be used to inform the review on the Reimbursement Guidance, Calculator and Appeals Guidance. If you have questions about this call to evidence please contact:

Email address: concessionaryfares@dft.gov.uk.

Annex A: Full list of consultation questions

Your details

Question 1

Your (used for contact purposes only):

name?
email?

Organisation details

Question 2

Your organisation's name is?

Question 3

Your organisation is a: *

travel concession authority (TCA)?
bus operator?

The following questions should be answered by a TCA only. If you are a bus operator, please skip to question 14.

TCA pre-COVID-19 concessionary payments

We are collecting information about the pre-COVID-19 concessionary payments that you have and are paying.

Question 4

Approximately how much money has your TCA spent (in pounds) on funding concessionary travel for:

the statutory requirement between 2018 to 2019?
the statutory requirement between 2019 to 2020?
the statutory requirement between 2020 to 2021?
any extra discretionary requirement between 2018 to 2019?

any extra discretionary requirement between 2019 to 2020?

any extra discretionary requirement between 2020 to 2021?

Question 5

Are you continuing to pay out pre-COVID-19 concessionary payments? *

Yes
No

Question 6

If no, why?

Question 7

Does your 2021 to 2022 budget include sufficient funds for paying out concessionary travel, at pre-COVID-19 levels, for the entire financial year?

Yes
No

Question 8

Are you willing to continue to pay out concessionary payments to bus operators at pre-COVID-19 levels for the remainder of this financial year?

Yes
No
Don't know?

Pre-COVID-19 continuing action

Question 9

What is the average percentage of pre-COVID-19 concessionary payments you are continuing to pay out to bus operators?

Speculative appeals

TCA's receive speculative appeals.

Question 10

How much do you agree or disagree with this statement?

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Don't know?

Why?

Managing speculative appeals

Question 11

How do you think speculative appeals could be managed?

TCA appeals

Question 12

How many appeals on average does your TCA deal with each year (pre-COVID-19) that are:

a withdrawn appeal?

an appeal ending in a determination letter?

Question 13

Have the amount of appeals, on average, you are receiving each year:

- increased?
- decreased?
- not changed?

The following questions should be answered by a bus operator only. If you are a TCA, please skip to question 19.

Bus operators pre-COVID-19 concessionary payments

We are collecting information about the pre-COVID-19 concessionary payments that you may be receiving from your TCA.

Question 14

Are you still receiving pre-COVID-19 concessionary payments from your TCA?

- Yes
- No

Bus operators pre-COVID-19 concessionary payments received

Question 15

What average percentage of pre-COVID-19 concessionary payments are you receiving from your TCA?

Bus operator appeals

Question 16

How many appeals on average do you make each year (pre-COVID-19) that result in:

a withdrawn appeal?

an appeal ending in a determination letter?

Question 17

Have the amount of appeals, on average, you are making each year:

- increased?
- decreased?
- not changed?

Appeals percentage change

Question 18

By what percentage have the number of appeals changed?

--

Recovery guidance

We plan to release recovery guidance explaining the transition plan for allowing Travel Concession Authorities to revert to paying out concessionary payments in line with actual patronage levels.

Question 19

When would you find it most useful for DfT to publish concessionary travel recovery guidance?

earlier than the publication of any updated reimbursement guidance/calculator

at the same time as the publication of any updated reimbursement guidance/calculator

later than the publication of any updated reimbursement guidance/calculator

Question 20

Do you have any concerns about the recovery strategy as sent?

- Yes
- No
- Don't know?

Recovery guidance concerns

We plan to release recovery guidance explaining the transition plan for allowing Travel Concession Authorities to revert to paying out concessionary payments in line with actual patronage levels.

Question 21

Rank the order of your concerns, using 1 as high concerned to 5 as low concern, with the proposed recovery strategy.

- It is too complicated a system
- It will take too long to transition back to actual patronage levels
- It will be too fast to transition back to actual patronage levels
- It will may create problems when interacting alongside the current reimbursement guidance and calculator
- Another issue

Explain your reasoning.

Recovery guidance

Question 22

What else would be useful to see contained within the recovery guidance?

Question 23

Any other comments on recovery strategy or guidance?

Reimbursement guidance

We believe some parts of the concessionary travel reimbursement guidance (opens in a new window) require alteration due to the impact of COVID-19 on travel patterns.

Question 24

How much do you agree or disagree with this statement?

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

Why?

Question 25

What are the areas of the reimbursement guidance that you believe need to be changed to allow it to work correctly in the present day situation and why?

Question 26

What are the areas of the reimbursement guidance that you believe need to be changed to allow it to work correctly with the proposed recovery strategy as sent and why?

Question 27

Any other comments on the reimbursement guidance?

Reimbursement calculator

We believe the [concessionary travel reimbursement calculator \(opens in a new window\)](#) is out of date and requires alteration due to the impact of COVID-19 on travel patterns.

Question 28

How much do you agree or disagree with this statement?

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Don't know?

Why?

Calculator improvement

Question 29

How do you believe the calculator could be improved?

Reimbursement calculator

Question 30

Any other comments on the reimbursement calculator?

Applications to the Secretary of State appeals

We believe the process for applications to the Secretary of State or 'appeals', [whereby applicants can apply to the Secretary of State for Transport for modification of concessionary fares schemes \(opens in a new window\)](#), should be improved.

Question 31

How much do you agree or disagree with this statement?

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Don't know?

Why?

Appeals improvement

Question 32

How to you believe the appeals system could be improved?

Appeals process cost

We believe the appeals are costly to deal with.

Question 33

How much do you agree or disagree with this statement?

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Don't know?

Why?

Appeals process administration

Question 34

You believe the existing administrative burden of appeals is:

- very high?
- high?
- neither high nor low?
- low?
- very low?
- unsure?

Why?

Appeals process improvement

Question 35

How you think this administrative burden could be alleviated?

Appeals cost

Question 36

How much does it cost on average to deal with (discounting the appeal financial decision):

a withdrawn appeal?

an appeal ending in a determination letter?

Question 37

Any other comments on the appeal process?

Question 38

Any other comments?

Annex B: Consultation principles

The consultation is being conducted in line with the Government's key consultation principles which are listed below. Further information is available at <https://www.gov.uk/government/publications/consultation-principles-guidance>

If you have any comments about the consultation process please contact:

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