

## EXPLANATORY MEMORANDUM TO

# THE CONCESSIONARY BUS TRAVEL ACT 2007 (VARIATION OF REIMBURSEMENT AND OTHER ADMINISTRATIVE ARRANGEMENTS) ORDER 2010

2010 No. [DRAFT]

1. This explanatory memorandum has been prepared by the Department for Transport and is laid before Parliament by Command of Her Majesty.

This memorandum contains information for the Joint Committee on Statutory Instruments.

## 2. Purpose of the instrument

2.1 This instrument will remove responsibility for administering the mandatory national bus concession in England from non-metropolitan district councils which are not unitary authorities and instead impose the obligation on county councils.

2.2 The instrument also removes the ability of all non-unitary district councils and metropolitan district councils in England to establish or administer their own discretionary travel schemes using powers under the Transport Act 1985. It does not remove the ability of district councils to introduce discretionary travel schemes under the well-being powers contained in the Local Government Act 2000.

## 3. Matters of special interest to the Joint Committee on Statutory Instruments

3.1 The Order amends primary legislation.

## 4. Legislative Context

4.1 This instrument amends section 146 of the Transport Act 2000 so that travel concession authorities who administer the mandatory travel concession in England will comprise only unitary authorities (whether county or district councils), other county councils, Passenger Transport Executives, London authorities and the Council of the Isles of Scilly.

4.2 The provisions of the Order generally come into force on 1<sup>st</sup> April 2011. However, an amendment of the Transport Act 2000 commences on 1<sup>st</sup> May 2010 for the purposes of enabling non-unitary county councils to publish and agree proposed reimbursement arrangements with bus operators for journeys beginning on or after 1<sup>st</sup> April 2011, at least four months before they are due to commence.

4.3 This instrument also amends section 93(8) of the Transport Act 1985 so that in England only a county council or the council of a non-metropolitan district in an area for which there is no county council may establish or administer discretionary travel schemes.

## 5. Territorial Extent and Application

5.1 This instrument extends to England and Wales, although no changes are made to the responsibility for administering travel concessions in Wales.

## **6. European Convention on Human Rights**

The Minister for Transport, Sadiq Khan has made the following statement regarding Human Rights:

In my view the provisions of the Concessionary Bus Travel Act 2007 (Variation of Reimbursement and Other Administrative Arrangements) Order 2010 are compatible with the Convention rights.

## **7. Policy background**

- *What is being done and why*

7.1 The introduction of free off-peak local bus travel throughout England from 1 April 2008 has given the opportunity for greater freedom and independence to around 11 million older and disabled people. The policy recognises the importance of public transport for older people and the role access to transport has to play in tackling social exclusion and maintaining well-being.

7.2 The structures in place to administer concessionary travel, and to reimburse bus operators for providing it, have remained largely the same today as they were when a (more limited) statutory minimum bus concession was first introduced in 2001. When the Concessionary Bus Travel Act 2007 was enacted prior to the introduction of the England-wide concession in April 2008, powers were included to enable a later transfer of responsibilities for administering concessionary travel to either upper tier authorities or to Central Government.

7.3 The Government believes that a shift in the responsibility for administering both the statutory minimum concession and any discretionary enhancements offered by local authorities under the provisions of the Transport Act 1985 to upper tier local authorities (county councils and unitary authorities) would bring with it many benefits, including:

- Enabling efficiencies to be realised, through economies of scale and by reducing the number of negotiations with bus operators;
- Making accurate funding by formula easier due to less variation in the size and characteristics of the authorities;
- Harmonising concessionary travel and wider transport authority responsibilities for the first time; and
- Assisting with the widespread implementation of smart ticketing

7.4 This instrument will remove responsibility for administering the mandatory national bus concession in England from non-metropolitan district councils which are not unitary authorities and instead impose the obligation on county councils. The instrument also removes the ability of all non-unitary district councils and metropolitan district councils to establish or administer their own discretionary travel schemes using powers under the Transport Act 1985. It does not remove the ability of district councils to introduce discretionary travel schemes under the well-being powers contained in the Local Government Act 2000.

## **8. Consultation outcome**

8.1 A consultation on possible changes to the administration of concessionary travel took place between 28<sup>th</sup> April 2009 and 21<sup>st</sup> July 2009.

8.2 A clear majority of responses to the consultation were in favour of a shift in responsibility for administering the statutory minimum concession to upper tier local authorities.

8.3 The responses with regards to who should have the power to administer discretionary concessions under the Transport Act 1985 were more mixed, with many in favour of limiting the ability of lower tier authorities to establish discretionary travel concessions but a similar number disagreeing. The Department believes that it will be more efficient for both operators and authorities to keep responsibility for the statutory minimum and discretionary concessions together.

## **9. Guidance**

9.1 The Department for Transport provides guidance to local authorities and bus operators on calculating reimbursement and on assessing eligibility for concessionary travel.

## **10. Impact**

10.1 An Impact Assessment is attached to this memorandum.

## **11. Regulating small business**

11.1 The legislation does not apply to small business.

## **12. Monitoring & review**

12.1 The policy will be reviewed three years after implementation to establish the actual costs and benefits of the change in administrative responsibility and to establish whether the desired effects have been achieved. The Department for Transport will liaise with local authority and bus operator stakeholders to ensure there are no difficulties with the practical implementation of this policy.

## **13. Contact**

Tracey Sedgley at the Department for Transport, Great Minster House, 76 Marsham Street, London SW1P 4DR, Tel: 020 7944 8842 or email: [Tracey.Sedgley@dft.gsi.gov.uk](mailto:Tracey.Sedgley@dft.gsi.gov.uk) can answer any queries regarding the instrument.

## Summary: Intervention & Options

|   |  |                              |
|---|--|------------------------------|
| <b>Department /Agency:</b><br><b>Department for Transport</b>   | <b>Title:</b><br><b>Impact Assessment of Administrative Reform of the National Bus Concession in England</b> |                              |
| <b>Stage: Implementation Stage</b>  | <b>Version: Final</b>  | <b>Date: 1 February 2010</b> |
| <b>Related Publications: Changes to Concessionary Travel announced in Pre-Budget Report, (December 2009), Consultation on Possible Changes to the Administration of Concessionary Travel (April 2009), and Consultation Response (December 2009).</b> |  |                              |

Available to view or download at: <http://www.dft.gov.uk/pgr/regional/buses/concessionary/>

Contact for enquiries: Geoff Dawe

Telephone: 020 7944 4372

What is the problem under consideration? Why is government intervention necessary?

The English national bus concession helps deliver the Government's wider goals on social inclusion, and access to the public transport network. However, problems have been identified including the burden of a large number of negotiations currently required between operators and authorities, a possible lack of capacity in some Travel Concession Authorities (TCAs) and the difficulty of accurately funding over 260 authorities. Changing how the concession is administered can mitigate these problems and achieve efficiency savings.

What are the policy objectives and the intended effects?

To reduce the administrative burden of concessionary travel on bus operators and local authorities, and to ensure that the concession is more effectively administered. In addition, positive benefits include: reduced complexity for operators and TCAs; improved service provision for concessionaires; improved assessment of measures to enhance transport accessibility, including concessionary travel; and better opportunities for the roll out of smart ticketing.

What policy options have been considered? Please justify any preferred option.

1 No change to the current arrangements.

2 Administration of the statutory minimum concession by upper-tier authorities (with upper tier discretionary enhancements),

Other Options (not included in this impact assessment): As option 2 but responsibility for discretionary enhancements with lower tier authorities; administration on a regional basis; central administration of the statutory minimum concession by DfT or one of its agencies (with upper tier discretionary enhancements); central administration which removes discretionary enhancements.

Option 2 is preferred due to efficiency savings, including less reimbursement negotiations and better alignment of transport responsibilities, policy and planning.

When will the policy be reviewed to establish the actual costs and benefits and the achievement of the desired effects? 3 years after implementation.

**Ministerial Sign-off** For implementation stage Impact Assessments:

***I have read the Impact Assessment and I am satisfied that, given the available evidence, it represents a reasonable view of the likely costs, benefits and impact of the leading options.***

Signed by the responsible Minister:

Sadiq Khan .....Date: 1st February 2010

## Summary: Analysis & Evidence

|                         |  |
|-------------------------|--|
| <b>Policy Option: 2</b> | <b>Description: Administration of statutory concession is moved to upper tier authorities with discretionary enhancements at an upper tier level (option 2b from consultation paper)</b> |
|-------------------------|--|

|  |  |            |  |
|--|--|------------|--|
| <b>COSTS</b>   | <b>ANNUAL COSTS</b>                            |            | Description and scale of <b>key monetised costs</b> by 'main affected groups' Costs to upper tier local authorities, who will now administer the scheme, of £1.25 million per year. These should be more than outweighed by the savings to lower tier authorities. |
|  | <b>One-off</b> (Transition)                    | <b>Yrs</b> |  |
|  | £  |            |  |
|  | <b>Average Annual Cost</b> (excluding one-off) |            |  |
|  | £ 1.25 m                                       | 10         | <b>Total Cost (PV)</b> <b>£ 10.4 million</b>   |
| <p>Other <b>key non-monetised costs</b> by 'main affected groups'</p> <p>Start up costs to upper tier local authorities that do not currently run schemes. Transition costs to operators as they get used to the new system. Potential cost to concessionary travellers from the removal of lower tier discretionary enhancements.</p> |  |            |  |

|  |   |            |  |
|--|---|------------|--|
| <b>BENEFITS</b>  | <b>ANNUAL BENEFITS</b>                            |            | Description and scale of <b>key monetised benefits</b> by 'main affected groups' Savings to lower tier authorities, who will no longer administer the concession, of £3.52m per year. Savings to operators who will have to participate in fewer schemes of £0.86m per year. |
|  | <b>One-off</b>                                    | <b>Yrs</b> |  |
|  | £   |            |  |
|  | <b>Average Annual Benefit</b> (excluding one-off) |            |  |
|  | £ 4.4m  | 10         | <b>Total Benefit (PV)</b> <b>£ 36.3 million</b>  |
| <p>Other <b>key non-monetised benefits</b> by 'main affected groups': Aligns TCA and Transport Authority responsibilities, offering potential of 'joined up' local transport planning; improved TCA capacity should lead to greater accuracy of reimbursement, and therefore fewer appeals, and so less staff time for TCAs and operators; potential for more accurate allocation of funding will provide improved stability to the finances of local authorities.</p> |   |            |  |

### Key Assumptions/Sensitivities/Risks

No separate provision of discretionary enhancements at the lower tier level.

|                         |                         |                                     |   |
|-------------------------|-------------------------|-------------------------------------|---|
| Price Base<br>Year 2008 | Time Period<br>Years 10 | <b>Net Benefit Range</b> (NPV)<br>£ | <b>NET BENEFIT</b> (NPV Best estimate)<br><b>£ 25.9 million</b> |
|-------------------------|-------------------------|-------------------------------------|---|

|   |  |       |       |            |       |
|---|--|-------|-------|------------|-------|
| What is the geographic coverage of the policy/option?                 |  |       |       | England    |       |
| On what date will the policy be implemented?                          |  |       |       | April 2011 |       |
| Which organisation(s) will enforce the policy?                        |  |       |       | TCAs       |       |
| What is the total annual cost of enforcement for these organisations? |  |       |       | £ N/A      |       |
| Does enforcement comply with Hampton principles?                      |  |       |       | N/A        |       |
| Will implementation go beyond minimum EU requirements?                |  |       |       | N/A        |       |
| What is the value of the proposed offsetting measure per year?        |  |       |       | £ N/A      |       |
| What is the value of changes in greenhouse gas emissions?             |  |       |       | £ N/A      |       |
| Will the proposal have a significant impact on competition?           |  |       |       | No         |       |
| Annual cost (£-£) per organisation<br>(excluding one-off)             |  | Micro | Small | Medium     | Large |
| Are any of these organisations exempt?                                |  | No    | No    | N/A        | N/A   |

|   |                          |                   |                       |  |  |
|---|--------------------------|-------------------|-----------------------|--|--|
| <b>Impact on Admin Burdens Baseline</b> (2005 Prices) |                          |                   | (Increase - Decrease) |  |  |
| Increase of    £0                                     | Decrease of    £0.79m pa | <b>Net Impact</b> | <b>£ -0.79m pa</b>    |  |  |

Key:    **Annual costs and benefits: Constant Prices**    **(Net) Present Value**

## Evidence Base (for summary sheets)

### Background

A Travel Concession Authority (TCA), as defined by section 146 of the Transport Act 2000, is an authority responsible for administering the mandatory travel concession. For the purposes of this document, lower tier authorities are district authorities in non-metropolitan areas (also known as 'shire' districts), and upper tier authorities are unitary authorities, county councils and Passenger Transport Executives.

The statutory minimum bus concession is administered locally by 263 Travel Concession Authorities outside London, who are responsible for setting local schemes, enforcement, requiring negotiations with local operators, issuing cards for their residents and responding to public enquiries. In London concessionary travel is administered by London Councils on behalf of the 33 London authorities.

### Rationale for Government Action

The Government has reviewed these arrangements to see whether they are still appropriate after the improvements to the statutory concession in England that have occurred since 2001. As part of that improvement concessionary travel has expanded from a patchwork system of local travel schemes, offered at the discretion of authorities, to a statutory, England-wide concession offering free travel for up to 11 million people at an annual cost of around £1 billion. Despite these changes, the administration of the scheme has remained broadly unchanged. The Government believes it is now appropriate to change the system so that it is run at the most appropriate level in terms of efficiency and policy making. The change in administrative arrangements is included in *Transport: Lightening the Load, the Department for Transport's Simplification Plan: Update 2009*.

### Descriptions of Options Considered in this IA

Various options were considered in the consultation paper. In the light of responses to the consultation paper two options are fully analysed below.

#### Option 1 - No change to the administration of the concession

The concession is currently administered through lower tier authorities. Many authorities however decide to co-operate on the organisation of their concessionary travel schemes.

#### Option 2 - Move TCA responsibility exclusively to upper tier authorities with upper tier discretionary enhancements (option 2b from consultation paper)

This would make no changes to the administration of concessionary travel in London or unitary areas. In non-Metropolitan counties the responsibility for administering both the statutory minimum and discretionary concessions would move from 'shire' district councils to county councils. In metropolitan areas it would remove the ability of metropolitan districts to administer discretionary concessions.

### Other Options Considered

As option 2 but with discretionary enhancements at lower tier level

Moving the administration to a regional level.

Centralising the administration of concessionary travel to DfT with upper tier discretionary enhancements.

Centralising the administration of concessionary travel to DfT, but leaving the option for discretionary enhancements at a lower tier level or removal of all discretionary enhancements.

### **Note on Calculations in this Impact Assessment**

The calculations in this impact assessment have been based on limited data. We are grateful for information provided as part of the consultation process, but inevitably assumptions have had to be made about the degree to which data concerned with particular circumstances or places can be transferred to the country as a whole. As the proposals under consideration would make no changes to the administration of concessionary travel in London, London authorities have not been included in the calculations.

### **Option 1 No change to the administration of the concession**

The current cost of administering concessionary travel can be divided into two separate areas: the cost to local authorities and the cost to operators. For the purposes of this Impact Assessment we have attempted to estimate the monetised costs to Local Government and the impact on operators.

#### Cost to Local Authorities

In administering a concessionary travel scheme local authorities are responsible for setting local schemes, negotiating with operators, issuing passes, processing application forms, posting passes to concessionaires and answering queries from the public. The staff costs incurred in performing these activities vary widely and it is extremely difficult to get an accurate idea of what these costs might be. Not only do the resources employed by TCAs vary widely from small district councils to PTEs, but many TCAs choose to pool their resources to create a single scheme. There are 263 TCAs outside of London but because Local Authorities group together to run the concession, there are in effect far fewer different schemes. The vast majority of existing lower tier authorities already co-operate with other authorities in their county. In addition, many unitary authorities co-operate with other authorities in their area.

The recent establishment of new unitary authorities changes the number of schemes that are operated. The base case in this impact assessment takes these changes to Local Government as given so that only the effects of changes in the administration of concessionary travel schemes is being measured. Based on our understanding of the current schemes we estimate that there are currently 73 schemes of which 9 are run by solo district councils while 64 schemes are at unitary, county, PTE or other co-operative level. These numbers may not be exact as they are only based on information we have been provided with and some schemes may currently be going through changes that we are not aware of.

A report produced for Nottinghamshire County Council by consultancy ITP to evaluate the cost of the scheme gives us some broad estimates that we have used to estimate overall costs. In the Nottinghamshire scheme, functions are split between the district and county level. The county council sets the scheme for the county while the district councils perform the day to day functions of issuing passes and responding to queries. On the basis of this report we estimate a cost of £200,000 of administering a county scheme. In the reply to the consultation Devon County Council said that their experience of managing a scheme for 7 districts indicated a cost of £300,000. For the purpose of this assessment we have taken the average of these two, £250,000. We estimate that smaller district schemes may have smaller costs. There will

however be some elements of the costs of running a scheme that do not vary with the size of the scheme. For the purposes of the calculation below we estimate that district council schemes incur 75% of the cost of larger schemes or £187,500.

In addition to the costs of running a scheme, TCAs that are part of a joint scheme which they do not lead will incur some costs. We estimate that there are currently 211 such TCAs. We estimate that such Authorities may devote a tenth of one employees time to such a scheme. Assuming a salary of £30,000 and employee on-costs of 40% would lead to the following estimate of total costs for such TCAs:

$$0.1 * £30,000 * (1 + 40\%) = £4,200$$

These figures would suggest that the total costs of administering the scheme for all local authorities outside London per year are:

Larger TCA Schemes:  $64 * £250,000 = £16.00$  million

Smaller TCAs Schemes:  $9 * £187,500 = £1.69$  million

TCAS within a Scheme:  $211 * £4,200 = £0.89$  million

Total Costs to Local Government are therefore estimated at £18.57 million.

These costs are based on the existing pattern of co-operation between TCAs to form joint schemes.

### Cost to Operators

The cost to operators fall into two categories: negotiation and administration. The cost of negotiation is based on information supplied by bus operators. The important assumptions are as follows: -

- the proportion of years where the scheme changes (80%),
- the number of days of negotiation where a scheme changes (15 in small authorities, 22.5 in large authorities),
- the number of days of negotiation where a scheme does not change (1 in small authorities and 1.5 in large authorities), and
- the cost per day of negotiation (£300).

This gives a rounded cost of negotiation per operator of between £3,500 and £5,500 depending on size of authority.

The cost of administration is estimated from the number of TCAs dealt with by each administrator (5) and the cost per administrator including employment on-costs. This gives a rounded figure of £8,000 per operator.

It is estimated that within each smaller scheme there are an average of 10 operators who will incur substantial costs from administration and negotiation of the scheme and within each larger scheme there are 13 such operators. Of the 73 schemes outside London post April 2009, 9 are for lower tier TCAs.

If it is assumed that the lower end of the negotiation costs are in lower tier TCAs while the higher end of the negotiation costs are incurred when the operator negotiates with a larger TCA, then the total cost to operators per year can be estimated:

$$(9 * 10 * (£3,500 + £8000)) + (64 * 13 * (£5,500 + £8000)) = £12.27m$$



## **Option 2 – Administration of statutory concession by upper tier authorities (with upper tier discretionary enhancements)**

### Impact on Local Authorities

There would be significant non-financial benefits for local authorities resulting from this option, including the alignment of TCA responsibility with the existing Transport Authority, thus leading to a rationalisation of local transport planning. Concessionary travel funding would represent a smaller part of county councils' budgets, creating less opportunity for budget risk to councils from larger than expected reimbursement to operators. In addition, allocating the funding for the concession to upper tier authorities should become smoother due to less variation in size and characteristics.

The overall cost to local authorities would also be likely to significantly fall as a result of a move to upper tier authorities. With the move to upper-tier authorities there will be 89 TCAs outside London. However, if it is assumed that those Unitary Authorities that already co-operate in the provision of their schemes continue to do so, the number of schemes outside London should fall to 65. This would include 5 new upper tier authorities running their own schemes and 9 lower tier authorities would no longer being responsible for running schemes. In addition we estimate there would also be 4 lower tier authorities who currently run their scheme on behalf of a group of authorities who would no longer have such a responsibility. 196 authorities who were previously responsible for participating in a larger scheme would lose such responsibilities. Based on the approximate cost per scheme quoted above the additional costs and savings can be estimated:

Additional cost =  $5 * £250,000 = £1.25$  million - There would also be start up costs for these authorities.

Saving to lower tier schemes =  $9 * £187,500 = £1.69$  million

Saving to TCAs within a scheme =  $196 * £4,200 = £0.82$  million

Saving to districts previously running a scheme for a group =  $4 * £250,000 = £1.00$  million

Total Savings to Local Government = £3.51 million

Net savings to Local Government (taking account of the new cost to upper tier authorities)  
£2.26 million

### Savings to Operators

If it is assumed that the number of schemes operating outside London falls to 65 and the number of large operators per scheme is 13 the cost to operators can be calculated:

$65 * 13 * (£5,500 + £8000) = £11.41$  million

The saving to operators is then estimated at  $(£12.27 \text{ million} - £11.41 \text{ million}) = £0.86$  million.

However, as these costs of administration are typically reimbursed by local authorities, these savings should in many cases flow back to local authorities. The greater capacity available at county level would also likely streamline the administration of concessionary travel more generally, so that operators are reimbursed more accurately.

### Other Impacts

Local Transport Plans (LTPs) are produced by transport authorities. The statutory requirements of LTPs include an obligation for local transport authorities to have regard to the transport needs

of older people and people with mobility difficulties. The Local Transport Act 2008 adds a new requirement to have regard to the needs of disabled people, both in developing and implementing plans. LTPs also recognise the government's goals for transport that includes equality of opportunity and enhancement of social inclusion. LTPs should demonstrate how policies and measures can effectively contribute to these goals. A number of measures can contribute to equality of opportunity and it is an important role for the LTP process to assess the best combination of these measures. Where responsibility for discretionary concessionary travel schemes is with transport authorities, they will be able to assess the contribution of the discretionary element of concessionary travel schemes to packages that affect access to transport and in turn have an effect on equality of opportunity and social inclusion.

There may be potential losses to users from the withdrawal of discretionary enhancements that are specific to lower tier authorities (with associated reimbursement savings), although this option would not preclude discretionary concessions still being implemented at the district council level by the county council. It is also possible however that discretionary enhancements could be standardised upwards (adding to reimbursement costs). There is also the potential to more accurately allocate funding to upper tier councils.

## Summary of Estimated Quantified Impacts of Option 2

The following table summarises the net annual savings of option 2 compared with option 1:

|                            | Net annual savings of option 2 cf. option 1 |
|----------------------------|---|
| <b>Saving To TCAs</b>      | £2.3m                                       |
| <b>Saving to Operators</b> | £0.9m                                       |
| <b>Total Net Savings</b>   | <b>£3.1m</b>                                |

## Consideration of Other Options

### Administration of statutory concession by Upper Tier authorities (with Lower Tier Discretionary Enhancements)

This is similar to option 2 but with lower tier authorities responsible for discretionary enhancements. Under this option the potential loss of existing discretionary enhancements might be avoided. Schemes may be administered by higher tier authorities on behalf of lower tier authorities or there could be separate reimbursement of discretionary enhancements at a lower tier level. Whichever option was chosen there would be duplication in administration and negotiation with operators and therefore fewer cost savings compared with option 2. In addition the benefits of better co-ordination of transport policies of option 2 would be less easily achieved or lost altogether.

### Regional Administration

A move to administer the concession on a regional basis also has the potential to reduce administration costs. It is not clear which regional bodies would take responsibility for the administration of the concession under this option. There would also be potential losses to users from the removal of discretionary enhancements.

### Central Administration with Upper Tier Discretionary Enhancements

This option was considered in the draft impact assessment (option 3) and in the consultation paper (option 3b). This option doesn't offer the level of costs savings of option 2 and neither does it allow for the co-ordination of policy and administration that is a feature of option 2.

#### Central Administration with retention of Lower Tier Discretionary Enhancements

This option has the potential to avoid costs to users associated with removal of discretionary enhancements, but would reduce the scope for cost savings and duplicates negotiations with bus operators.

#### Central Administration with removal of all Discretionary Enhancements

There will be losses to users from the withdrawal of discretionary enhancements (though the associated reimbursement costs would be saved). Administration savings would have the potential to be much larger than with retention of discretionary enhancements. But there would be no policy co-ordination benefits at a local level.

### **Conclusions**

It is estimated that the administration of concessionary travel schemes by upper tier local authorities should produce savings to local authorities and operators. However, this is on the basis that the administration of discretionary enhancements would be rationalised. There are also important unquantified benefits arising from a better assessment of policies and packages of transport measures. Local authorities will be able to assess the appropriate policies, including concessionary travel, for bus services in their area, which will maximise transport accessibility. Other options have been considered, including a national administration, but they do not guarantee the same level of cost savings and neither do they afford the benefits of having administration and policy at the same level of government.

## Specific Impact Tests: Checklist

Use the table below to demonstrate how broadly you have considered the potential impacts of your policy options.

**Ensure that the results of any tests that impact on the cost-benefit analysis are contained within the main evidence base; other results may be annexed.**

| <b>Type of testing undertaken</b> | <b><i>Results in Evidence Base?</i></b> | <b><i>Results annexed?</i></b> |
|-----------------------------------|---|--------------------------------|
| Competition Assessment            | No                                      | Yes                            |
| Small Firms Impact Test           | No                                      | Yes                            |
| Legal Aid                         | No                                      | Yes                            |
| Sustainable Development           | No                                      | Yes                            |
| Carbon Assessment                 | No                                      | Yes                            |
| Other Environment                 | No                                      | Yes                            |
| Health Impact Assessment          | No                                      | Yes                            |
| Race Equality                     | No                                      | Yes                            |
| Disability Equality               | No                                      | Yes                            |
| Gender Equality                   | No                                      | Yes                            |
| Human Rights                      | No                                      | Yes                            |
| Rural Proofing                    | No                                      | Yes                            |

## Annexes

### **Competition Assessment**

There should be no impact on competition as whatever the tier of administration, concessionary travel reimbursement does not subsidise the operators. Instead, no matter which services are covered by the scheme, they should all be reimbursed on a no better, no worse basis.

### **Small Firms Impact Test**

There should be no impact on small firms as whatever the tier of administration concessionary reimbursement does not subsidise the operators. Instead, no matter which services are covered by the scheme, they should all be reimbursed on a no better, no worse basis.

### **Legal Aid Impact Assessment**

No legal aid impact is envisioned.

### **Sustainable Development/Carbon Assessment/Other Environment Impact Assessment**

We do not expect any direct effect of the proposals on the environment. If there are changes in discretionary schemes, there could be an effect on travel patterns, for example people may choose to re-time their trips, continue to travel at the same time, not make the trip at all or switch to an alternative mode of transport. Some of these impacts could have an effect on the environment, though the impact whether positive or negative, is likely to be very small. We would expect local authorities to assess the benefits and costs of discretionary concessionary travel schemes and other transport policies for their impact on the environment.

### **Health Impact Assessment**

We do not expect any direct impact of the proposals on health. As above there are various possible responses, most of which would have no direct impacts on health. We would expect local authorities to assess the benefits and costs of discretionary concessionary travel schemes and other transport policies for their impact on health.

### **Race Equality/Disability Equality/Gender Equality**

No impact on race equality or gender equality is envisioned. If there are changes in discretionary schemes that could affect the travel of disabled people and their helpers, we would expect local authorities to assess the benefits and costs of discretionary concessionary travel schemes and other transport policies for their impact on the welfare of disabled people.

### **Human Rights**

No human rights impact is envisioned.

### **Rural Proofing**

We do not expect any direct impact of the proposals on rural areas. A number of rural areas have discretionary travel schemes to reflect particular travel needs. We would expect local authorities to assess the benefits and costs of discretionary concessionary travel schemes and other transport policies for their impact on access in rural areas.