COMMUNITY TRANSPORT INQUIRY

INCLUSION SCOTLAND

WRITTEN SUBMISSION

1 Background

1.1 Inclusion Scotland (IS) is a Scottish-wide network of disabled people’s organisations which exists to draw attention to the physical, social, economic, cultural and attitudinal barriers that affect disabled people’s everyday lives. Inclusion Scotland is funded primarily by the Scottish Government’s Equalities Unit.

1.2 We are pleased to see the Scottish Parliament’s serious consideration of the future of Community Transport via the Infrastructure and Capital Investment Committee’s enquiry. In recent written evidence to the Welfare Reform Committee regarding passported benefits, we said: ‘Inclusion Scotland would … urge Scottish Government to give greater consideration to investment in Community Transport as a means of assisting disabled people who will otherwise lose their ability to fully participate in Scottish economic and social life along with their entitlement to the DLA mobility components’.

1.3 We therefore consider this enquiry has come not a moment too soon given the urgency and the speed at which changes to benefits are underway via welfare reform this year. We welcome the opportunity to work with the Infrastructure and Capital Investment Committee on this enquiry into such an essential service for disabled people, and we hope that our evidence will help lead the committee to strengthening our above recommendation to the Government.

1.4 We support accessible transport for disabled people as a key means of achieving independent living; getting out and about and to work etc. Community Transport is more responsive and accessible to disabled people than services provided by private companies and we therefore support any efforts to expand its availability to disabled people.

1.5 The Committee has recognised that previous research and enquiries identify various issues:
   - A lack of a strategic approach to community transport and the impact which a lack of transport has on people’s lives
   - The growing demand for community transport provision
• A lack of a coordinated approach with NHS bodies and community transport providers
• Eligibility criteria for non-emergency patient transport and the cost to NHS of taxi use.
• Replacing community transport vehicles and funding planning.
• Access to concessionary fares schemes.

1.6 Inclusion Scotland recognise each of these issues as being crucial to successful and universal implementation of community transport to disabled and older people in Scotland who need it. Access to transport can mean the difference between being imprisoned in one’s home and achieving the right to independent living to many disabled people. For example, not being able to leave the house can mean people not being able to access health care, work and community life. It can mean the difference between coping and not coping. Scotland has a large rural population for whom a lack of community transport would mean complete isolation from other people on a day to day basis.

1.7 As independent living is a human right, as enshrined in the UN Convention of the Rights of Disabled People (UNCRPD), it is crucial that the issues identified are tackled. We believe that the impact that Community Transport has on people’s lives should underpin all the other issues and open up action to address them. Below we expand on some of those issues and specifically on some new challenges facing the successful provision of community transport, in particular the projected loss of benefits as a consequence of the UK Government’s welfare reform programme, as well as examining some more ongoing issues that continue to aggravate delivery of this key service.

2 Benefit cuts and the growing demand for Community Transport

2.1. In December 2012 the UK Government announced an unexpected change in the Personal Independence Payment Assessment criteria. This change reduces the distance someone can walk (safely) before qualifying for the Enhanced Mobility element of PIP from 50 metres to 20 metres (the Enhanced Mobility element of PIP is equivalent to the Higher Rate Mobility Component of DLA). The change has contributed to a substantial increase in the numbers expected not to qualify for the Enhanced Mobility element of PIP – up from 250,000 to 428,000 (a 70% increase).

2.2. Using the DWP’s projections Inclusion Scotland estimates that, by 2018, over 80,000 working age disabled people in Scotland will lose either some or all of the mobility allowance that they would otherwise have been entitled to:
- **47,000** will lose higher/enhanced rate mobility allowance. The subsequent loss in income to disabled people in Scotland will be at least £135 million a year by 2018.
- **34,100** will lose standard rate mobility allowance. The subsequent loss in income to disabled people in Scotland will be at least £37 million a year by 2018.

2.3 As one in three current Higher Rate DLA Mobility component recipients currently use their benefit to lease Motability vehicles as many as 16,000 disabled people in Scotland may also lose their Motability cars and scooters, leading to a growing demand for accessible and responsive community transport.

2.4 As can be seen if automatic entitlement to passported benefits such as the Blue Badge Scheme, or National Concessionary Travel Scheme, was simply transferred from the claimant’s receipt of the higher mobility component of DLA to their receipt of the enhanced mobility component of PIP, then tens of thousands of disabled people with mobility issues would lose their entitlement to these passported benefits.

2.5. This would add considerably to the difficulties that they would face in participating in family and community life and, for example, in accessing employment, as not only would they have lost monetary assistance (the mobility element of DLA) which previously helped meet the additional travel costs arising from their impairment or condition but they would be faced with an extra call on their remaining income through suddenly having to meet transport costs that they did not previously have – i.e. parking costs and/or bus fares. A strategic national approach to increasing and ensuring availability of community transport would go some way to mitigating the impact that these changes will have on disabled people.

3 **Access via National Concessionary Travel Scheme**

3.1 Whilst we agree that qualification for the National Concessionary Travel Scheme should be applied to Community Transport initiatives, we have a great concern about the numbers of disabled people losing entitlement to this scheme as a consequence of the projected number of losers of Personal Independence Payment (PIP). Although the overall numbers of those who will be in receipt of concessionary travel look similar there will in fact be considerable numbers (tens of thousands) who will lose automatic entitlement and yet still have significant Mobility issues.
3.2 The reason for this is that the numbers on the new Daily Living Allowance elements of PIP are projected to increase (though as there is no Lower Rate Care element of PIP this masks an overall decrease in those receiving help with their care costs) whilst those on the two new Mobility components are expected to decrease sharply.

3.3 Thus tens of thousands (i.e. not all of the 47,000 Higher Rate Mobility losers but a fair proportion) of previous recipients of the Higher Rate Mobility Component of DLA are likely to lose automatic entitlement to concessionary travel when it comes time to renew their cards. The transitional protection [proposed by Scottish Government] is thus temporary and the eventual loss of concessionary travel could be devastating given that thousands of people (potentially 16,000+) will also, as a consequence of losing their Higher Rate Mobility, have also lost their Motability vehicles.

3.4 Losing access to the NCT scheme will impact on disabled people’s basic human rights, for example their EHRC and HRA article 8 right to family life. We have outlined in the background (1.4) the wider impact on people’s human rights a lack of access to transport would have.

3.5 As a consequence we have advised the Scottish Parliament’s welfare reform committee that we do not believe that the transitional protection offered is adequate or fair to those who have considerable difficulties in mobilising – i.e. who are unable to walk safely, reliably and repeatedly for no more than 50 metres. We have therefore recommended that qualification for blue badge (for many of whom will not have access to a vehicle) could act as a gateway to qualifying for the NCT scheme.

3.6 If this pass-porting route is taken at the same time as using the NCT scheme as a means of accessing Community Transport, there is potential to boost access to transport for the people who really need it i.e. disabled people with mobility impairments and those losing their motability vehicles.

4 A Strategic Approach

4.1 On sending out notification of this enquiry to member organisations and associate organisations, a Community worker from Chest, Heart and Stroke Scotland contacted me about the various issues that a non-strategic approach has posed to their community groups over the years. Her community work covers a large area from Oban in the north down to Dumfries and Galloway and everything in between including Glasgow and Lanarkshire.

4.2 The brief comments were:
“I find a very different picture in each area. For instance in Glasgow some areas are very well serviced with their community transport, but in the past this transport may have been provided through Social Work so the group are restricted as to where they can pick up clients. This excludes some people from attending our groups. Other areas have no community transport for example North Ayrshire and other areas use Red Cross – Argyll”.

4.3 This community worker also commented that there is a ‘litany of problems’ around Community Transport. Clearly the issue again comes back to disabled people’s human rights under the UNCRPD to be included in their community and to independent living. A strategic national approach that accounted for local issues such as rurality would go some way to addressing this ‘litany of problems’.

5 Conclusion

5.1 Disabled people in Scotland currently face a barrage of assaults to their hard fought for human rights like never before through the UK government’s welfare reform programme of cuts. Loss of mobility is just one aspect of the ways in which the cuts will detrimentally impact on our human right to independent living. For many the cuts will mean a loss of freedom and tantamount imprisonment in their homes or in care homes.

5.2 We look forward to the Scottish Government making efforts to mitigate some of the disastrous impacts of those cuts by putting in place positive actions that might lead to disabled people in Scotland having continued access to health, education, leisure, community and family life. We hope that the reasons for ensuring that access to Community Transport is widened as far as possible for all disabled people with transport need in Scotland are clear.

Inclusion Scotland
19 April 2013