

**Bus travel in Wales: Report on Disabled Person's Welsh Concessionary Travel Card and companion pass across Wales**

Wales Council of the Blind and members of the [Welsh Rehabilitation Officers Forum](http://wcb-ccd.org.uk/wrof) received concerns from people with sight loss about applying / renewing their disabled person’s bus pass and/or companion pass.

“People with sight loss are regularly denied companion bus passes, even when registered Severely Sight Impaired (SSI), though it states they have to be registered SSI. Usually, we have to support with a letter to provide extra evidence. GP’s have also provided support. The Bus pass team do contact us to clarify”, Vision Rehabilitation Specialist.

**What we have found.**

As of 11th September 2019, Disabled person’s bus passes are processed by Transport for Wales. Companion bus passes are meant to be processed by the local authority of residency. However, there are a number of local authorities that suggest that all passes processed are completed by Transport for Wales. We need to see a consistent message across Wales.

**Disabled Person’s Welsh Concessionary Travel Card**

18 out of 22 local authorities direct people to the Transport for Wales website. However, there are a number of links used, we believe that the best link to use would be [Apply for a Disabled Person's Welsh Concessionary Travel Card](https://portal.tfw.wales/en/disabled). The form can be completed online with some local authorities suggesting that [local libraries](http://wcb-ccd.org.uk/perspectif/search?type=41&la=&keyword=library&postcode=) can assist people with this. We would like to see a clear telephone number where people can request an accessible electronic or paper copy.

[Eligibility](https://tfw.wales/info-for/over-60s/travel-card-eligibility) criteria for a Disabled Person’s bus pass on the transport for Wales website seems to vary for people with sight loss. Evidence of receiving benefits including higher mobility for Disability Living Allowance (DLA) and Personal Independent Payment (PIP) would prevent someone applying for a bus pass early in their diagnosis and could also exclude many people who are registered as sight impaired (SI). In addition to this, eligibility Assessment Approval from the local authority states that you meet one of the following criteria:

1. Have a high degree of sight loss in both eyes.
2. Severely sight impaired – cannot read, (with your glasses if worn) the top letter of a standard eye test chart at a distance of 3 metres or less.
3. Sight impaired – can only read (with your glasses if worn) the top letter of a standard eye test chart at a distance of 6 metres or less.

In criterion (i) there is no detail of what the high degree of sight loss in both eyes is, the implication would suggest that people who are sight impaired could not be eligible. Criteria (ii) and (iii) would exclude those who are sight impaired, as well as a range of sight conditions, such as tunnel vision. In general, there is clearly a problem with the logic of criteria (ii) & (iii), and possibly with the measurements given.

In contrast to the above unnecessarily exclusive criteria, clause (7) states that someone is eligible if they would be refused a licence to drive a motor vehicle under Part III of the Road Traffic Act 1988, pursuant to section [92 of that Act](https://www.legislation.gov.uk/ukpga/1988/52/section/92) (physical fitness) other than on the ground of persistent misuse of drugs or alcohol. This would therefore include anyone who is registered as SI or SSI. This notion is supported by the [CVI(W) Welsh Health circular](https://www.gov.wales/sites/default/files/publications/2019-07/certification-of-vision-impairment-wales.pdf) where it states that, “as a driver with sight loss you must inform the DVLA of this at the earliest opportunity. Whilst the DVLA will consider each case on an individual basis it is likely that if you have been given this information you should not continue to drive.”

One authority informed residents of the changes to concessionary travel cards whereby if you currently have a green-coloured Concessionary Travel Card issued by them, you will need to apply for a new-style card from Transport for Wales.

The authority then seems to contradict eligibility criteria (detailed above) by stating that residents can apply for a Concessionary Travel Card if they meet all of the following:

* are aged 60 or over
* have a physical or learning disability
* live in the authority.

With a number of local authorities stating that a disabled person's bus or travel pass is issued to people who are blind or partially sighted, this process would be simplified by adding sight impaired and severely sight impaired to the eligibility criteria. This is supported by Welsh Governments document ‘[Concessionary Bus Travel Scheme Guidance: A Common Approach to Eligibility](https://www.gov.wales/sites/default/files/publications/2019-06/concessionary-bus-travel-scheme-guidance_1.pdf)’ with effect from April 2019. There is a section within the document on sight loss (45-50) which describes registration as eligibility.

Generally, to be certified as **severely sight impaired (blind),** your sight must fall into one of the following categories, while wearing any glasses or contact lenses that you may need:

* Visual acuity of less than 3 / 60 with a full visual field.
* Visual acuity between 3 / 60 and 6 / 60 with a severe reduction of field of vision, such as tunnel vision.
* Visual acuity of 6 / 60 or above but with a very reduced field of vision, especially if a lot of sight is missing in the lower part of the field.

To be certified as **sight impaired (partially sighted)** your sight must fall into one of the following categories, while wearing any glasses or contact lenses that you may need:

* Visual acuity of 3 / 60 to 6 / 60 with a full field of vision.
* Visual acuity of between 6 / 60 and 6 / 24 with a moderate reduction of field of vision, cloudiness in parts of your eye, or your lens has been removed and not replaced with a lens implant
* Visual acuity of 6 / 18 or even better if a large part of your field of vision, for example a whole half of your vision, is missing or a lot of your peripheral vision is missing.

We must remember that deciding to register is voluntary and that “local authorities may - where a person with sight loss is not on the local authority register of sight impairment - require evidence of eligibility to be registered as having sight impairment”.

**How much does it cost?**

The first Transport for Wales Concessionary Travel Card is free, including those changing from the old-style cards.

If your Concessionary Travel Card gets lost, stolen or damaged, you can get a replacement by applying to Transport for Wales. There is a £10 charge for a replacement Concessionary Travel Card but some local authorities state that the charge is £5. There needs to be clarity of the fee to replace a card.

**Disabled Person with Companion Travel Card**

A disabled person’s bus pass with a companion is a version of the pass. If you require assistance from another person when travelling for some or all of your journey you can apply for a companion card that provides free travel for one person accompanying you.

**How to apply for a disabled person's concessionary bus pass with a companion.**

Applications for new companion passes are made to the local authority, not Transport for Wales.

“I was advised that with companion passes, it was expected that a person would need support most of the time from another person. I did ask what if an individual travelled alone, they said now and again would be considered ok, however the expectation would be that a companion would be needed.”

“Eligibility is very strict for companion passes. There are exceptions, however you are looking at having a dual sensory loss or cognitive impairment for automatic eligibility”.

Guidance states that, “if you qualify for a concessionary bus pass but cannot travel by bus without needing the help of another person, you may be eligible to be assessed for a Disabled Person's Concessionary bus pass with a companion”.

In addition to the above, transport for Wales website states that, “if you require assistance from another person when travelling **for some or all of your journeys** you can apply for a companion card that provides free travel for one person accompanying you”.

Welsh Government’s document ‘[Concessionary Bus Travel Scheme Guidance: A Common Approach to Eligibility](https://www.gov.wales/sites/default/files/publications/2019-06/concessionary-bus-travel-scheme-guidance_1.pdf)’ states that “the impairment may mean that the pass holder does not need assistance on every journey. But where assistance is required, the companion must accompany the pass holder for the whole of the bus journey. For example a person in receipt of a Personal Independence Payment award for “Planning and Following a Journey”, once having undertaken journeys to the same place, could do that route alone. However, a more complex journey for them may still require the assistance of a companion”.

The distinction here is that a companion bus pass could be awarded for assistance for some or all of your journeys. However, journeys that are to be considered as familiar routes may require assistance or not depending on the time of day. For example, passengers with [Retinitis Pigmentosa](http://wcb-ccd.org.uk/perspectif/glossary/62/retinitis-pigmentosa) who may not require a companion pass during the day would rely on one in the darker nights. Similarly, a passenger who has trouble finding a seat would require assistance at busy times while at quiet times could manage on their own. We hear often of passengers being refused travel without their companion. This is clearly not how it is expressed in the guidance. We would want to see bus drivers having a better understanding of the regulations.

You may be eligible for a companion bus pass if you have;

1. Challenging behaviours, and need to be supervised at all times
2. Severe cognitive and mental impairments (including people who have no awareness of risk and limited ability to plan and follow a journey)
3. A combination of either visual and hearing loss that prevents independent mobility or visual and speech loss that prevents independent mobility
4. Difficulties using a wheelchair independently.

Clause 3 seems to imply that you will not be eligible for a companion bus pass for vision impairment alone. The guidance is that if you require a companion card, you’ll need to contact your local council. They'll assess whether you meet the criteria, and can then process your application.

There is concern that people with sight loss (only) would be ineligible if the above guidance is being used. However, to add confusion, a number of local authorities state eligibility includes being blind or partially sighted. With almost 25% of people with sight loss of working age we would want to see eligibility to include blind and partially sighted people. Only 15 local authorities across Wales include information on how to apply for a companion pass with them. We would want to see all 22 local councils providing details of how and where to apply, and in a range of accessible formats.

**Proof and assessment**

All applicants will need to provide two proofs of permanent residency within the local authority (eg Bank statement, council tax bill, other official document(s), utility bill e.g. gas, electric), proof of eligibility and will also need to provide their National Insurance number. A complete list of [acceptable documents](https://tfw.wales/info-for/over-60s/travel-card-eligibility) can be found on Transport for Wales website. The documents are not exhaustive and local authorities may consider other appropriate documents or evidence submitted as proof of residency.

It may be necessary for a local authority to assess a person’s eligibility.

One authority stated that the applicant is responsible for ensuring that any fee levied to cover the cost of an assessment is met, and that the local authority have no duty to reimburse any such fees [clause 83 - ‘[Concessionary Bus Travel Scheme Guidance: A Common Approach to Eligibility](https://www.gov.wales/sites/default/files/publications/2019-06/concessionary-bus-travel-scheme-guidance_1.pdf)’]. We would like to better understand this process and that the applicant is provided with the cost ahead of any assessment being made. What help is available for those who cannot afford an assessment fee? Is there a distinction to be made between the local authority initiating an assessment and the individual initiating an assessment with regard to responsibility for paying the fee?

Another authority explained that “your need for a companion must be verified in writing (a letter or email) by an appropriately qualified medical, health or social worker. You will need to provide a scan, good quality photo, or screenshot of the evidence”. We would like to see Vision Rehabilitation Specialist (VRS) added to the list of appropriately qualified workers as they are best placed to provide supporting evidence for people with sight loss.

**Conclusions and recommendations**

The process for applying for Disabled Person’s and Companion bus passes must be consistent across Wales. The following recommendations would help this:

1. There needs to be a consistent message that Transport for Wales processes all Disabled Person’s bus passes.
2. There should be a clear telephone number where people can request an electronic or paper copy of their Disabled Person’s bus pass.
3. We would want to see one link to the Transport for Wales website when applying for a Disabled Person’s bus pass.
4. [Eligibility](https://tfw.wales/info-for/over-60s/travel-card-eligibility) criteria for a Disabled Person’s bus pass: In general, there is clearly a problem with the logic of criteria (ii) & (iii), and possibly with the measurements given.
5. Evidence of being SI and SSI should be sufficient as edibility for a Disabled Person’s bus pass. We must remember that deciding to register is voluntary and that “local authorities may - where a person with sight loss is not on the local authority register of sight impairment - require evidence of eligibility to be registered as having sight impairment”.
6. There needs to be clarity of the cost to replace a lost, stolen or damaged card.
7. We would want to see all 22 local councils providing details of how and where to apply for a companion bus pass, and in a range of accessible formats.
8. We would like to better understand the process of being assessed for a companion pass and that the applicant is provided with the cost ahead of any assessment being made. What help is available for those who cannot afford an assessment fee? Is there a distinction to be made between the local authority initiating an assessment and the individual initiating an assessment with regard to responsibility for paying the fee?
9. We would want to see consistent use of edibility criteria across Wales, as well as consistent application of the regulations by bus drivers.
10. We would like to see Vision Rehabilitation Specialist (VRS) added to the list of appropriately qualified workers as they are best placed to provide supporting evidence for people with sight loss applying for a companion pass.

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**Appendix 1**

[**Disabled Person's Welsh Concessionary Travel Card**](http://wcb-ccd.org.uk/perspectif/service/1175/disabled-persons-welsh-concessionary-travel-card)

**Disabled Person with Companion Travel Card by local authority**

[**Anglesey**](http://wcb-ccd.org.uk/perspectif/service/1177/disabled-person-with-companion-travel-card-anglesey)

[**Gwynedd**](http://wcb-ccd.org.uk/perspectif/service/1178/disabled-person-with-companion-travel-card-gwynedd)

[**Conwy**](http://wcb-ccd.org.uk/perspectif/service/1179/disabled-person-with-companion-travel-card-conwy)

[**Denbighshire**](http://wcb-ccd.org.uk/perspectif/service/1180/disabled-person-with-companion-travel-card-denbighshire)

[**Flintshire**](http://wcb-ccd.org.uk/perspectif/service/1181/disabled-person-with-companion-travel-card-flintshire)

[**Wrexham**](http://wcb-ccd.org.uk/perspectif/service/1182/disabled-person-with-companion-travel-card-wrexham)

[**Powys**](http://wcb-ccd.org.uk/perspectif/service/1183/disabled-person-with-companion-travel-card-powys)

[**Ceredigion**](http://wcb-ccd.org.uk/perspectif/service/1184/disabled-person-with-companion-travel-card-ceredigion)

[**Pembrokeshire**](http://wcb-ccd.org.uk/perspectif/service/1185/disabled-person-with-companion-travel-card-pembrokeshire)

[**Carmarthenshire**](http://wcb-ccd.org.uk/perspectif/service/1186/disabled-person-with-companion-travel-card-carmarthenshire)

[**Swansea**](http://wcb-ccd.org.uk/perspectif/service/1187/disabled-person-with-companion-travel-card-swansea)

[**Neath Port Talbot**](http://wcb-ccd.org.uk/perspectif/service/1199/disabled-person-with-companion-travel-card-neath-port-talbot)

[**Bridgend**](http://wcb-ccd.org.uk/perspectif/service/1188/disabled-person-with-companion-travel-card-bridgend)

[**Rhondda Cynon Taff**](http://wcb-ccd.org.uk/perspectif/service/1189/disabled-person-with-companion-travel-card-rhondda-cynon-taf)

[**Merthyr Tydfil**](http://wcb-ccd.org.uk/perspectif/service/1190/disabled-person-with-companion-travel-card-merthyr-tydfil)

[**Cardiff**](http://wcb-ccd.org.uk/perspectif/service/1191/disabled-person-with-companion-travel-card-cardiff)

[**Vale of Glamorgan**](http://wcb-ccd.org.uk/perspectif/service/1192/disabled-person-with-companion-travel-card-vale-of-glamorgan)

[**Caerphilly**](http://wcb-ccd.org.uk/perspectif/service/1193/disabled-person-with-companion-travel-card-caerphilly)

[**Blaenau Gwent**](http://wcb-ccd.org.uk/perspectif/service/1194/disabled-person-with-companion-travel-card-blaenau-gwent)

[**Torfaen**](http://wcb-ccd.org.uk/perspectif/service/1195/disabled-person-with-companion-travel-card-torfaen)

[**Monmouthshire**](http://wcb-ccd.org.uk/perspectif/service/1196/disabled-person-with-companion-travel-card-monmouthshire)

[**Newport**](http://wcb-ccd.org.uk/perspectif/service/1197/disabled-person-with-companion-travel-card-newport)