



## REPORT TO INFRASTRUCTURE SERVICES COMMITTEE – 9 MAY 2013

### Amendment to TaxiCard Scheme Eligibility Criteria

#### 1 Recommendations

The committee is recommended to:

- 1.1 **approve the extension of the TaxiCard eligibility criteria to include those who receive mobility component of PIP (Personal Independence Payment) awarded at either (i) 8 points or more for “moving around” or (ii) 12 points or more for “planning and following journeys”.**

#### 2 Background / Discussion

- 2.1 The TaxiCard Scheme provides discounted taxi and rail fares for physically disabled residents who are unable to use bus services or who have difficulty in doing so, due to lack of mobility. The scheme is not aimed at those with a non-physical disability who are deemed able to travel by bus with the assistance of a companion.
- 2.2 Aberdeenshire residents who have a severe walking difficulty and are in receipt of Higher Rate Mobility Component Disability Living Allowance (HRMC DLA) automatically qualify for a TaxiCard. Under the Welfare Reform (Consequential Amendments) (Scotland) Regulations 2013, DLA is being replaced for those of working age (age 16-64) by Personal Independence Payments (PIP) which will be phased in from June 2013 for new claimants. The majority of TaxiCard holders who receive DLA will not be reassessed under PIP until 2015.
- 2.3 The recommended amendment to the eligibility criteria seeks to ensure that those individuals, and only those individuals, who currently meet the eligibility criteria for a TaxiCard will continue to do so.
- 2.4 Appendix 2 summarises the PIP assessment scores and the proposals relating to the TaxiCard scheme. More information about PIP can be found on the Department for Work & Pensions website, including a quick guide for local authorities at <http://www.dwp.gov.uk/docs/pip-quick-guide-local-authorities.pdf> and more detailed information at <http://www.dwp.gov.uk/docs/pip-editorial-for-local-authorities.doc> .  
Passporting arrangements are being put in place for the transfer from DLA to PIP for government benefits such as Blue Badge and concessionary bus travel and these have been taken into account when considering the recommendation for the amendment to the TaxiCard Scheme eligibility criteria.

- 2.5 For a person with a walking difficulty to get HMRC DLA they must be unable or virtually unable to walk without severe discomfort, even when using equipment or an aid, or are at risk of endangering their life or causing deterioration in their health by making the effort to walk. There is no fixed qualifying distance in the regulations, but applicants are less likely to qualify if they can walk more than 50 metres without severe discomfort.
- 2.6 Under PIP's mobility component those who cannot move more than 50 metres will be awarded 8 points or more under the category "moving around". It is therefore proposed that the TaxiCard eligibility criteria be extended to include "those who receive mobility component of PIP awarded at 8 points or more for "moving around". Such persons will also automatically qualify for the Scotland-wide free travel Scheme and the Blue Badge Scheme.
- 2.7 HMRC DLA is also awarded to persons who are physically able and do not have a sensory impairment but their understanding of the world precludes them from using public transport, and as such these individuals are currently entitled to a TaxiCard. As mentioned in paragraph 2.3, the aim is to replicate the current eligibility criteria as best as possible so that those who are currently entitled to a TaxiCard are not excluded. It is therefore recommended that the criteria be extended to include those receiving the highest score of 12 points under the "planning and following journeys" category of PIP. Such individuals will also qualify for a Blue Badge.
- 2.8 HRMC DLA will continue for those under 16 and those over 64 who qualified prior to the age of 65, so it will be retained as one of the qualifying criteria for TaxiCard, which are listed in Appendix 3 of the report, along with the current scheme benefits.
- 2.9 The numbers of first-time TaxiCard applications received from individuals awarded PIP will be monitored and compared to application trends under DLA. Any significant differences to expectations will inform any future review of the eligibility criteria.
- 2.10 The impact of PIP may only become fully apparent once current recipients of DLA are re-assessed. Whilst this will be phased in from October 2013 onwards, most individuals will not be affected before October 2015. Requests for TaxiCard renewals will be monitored to check whether applicants meet the new TaxiCard criteria and this information will be used to inform any future review of the eligibility criteria.
- 2.11 The Head of Finance and Monitoring Officer within Corporate Services have been consulted in the preparation of this report and are in agreement with the report. The Social Work Head of Service (Adult & Criminal Justice) and Head of Service (Older People & Disabilities) have been consulted and views have been taken into account.

### **3 Equalities, Staffing and Financial Implications**

- 3.1 An equality impact assessment has been carried out as part of the development of the proposals set out above. It is included as Appendix 1 and no impact has been identified.

- 3.2 Given that the proposed amendment aims to have a neutral effect on the numbers of TaxiCard applications and cardholders there are no direct staffing or financial implications.

### **Director of Infrastructure Services**

Report prepared by Marion Mackay, Principal Officer (DRT, Fares & Ticketing)  
Date 24/04/13

APPENDIX 1

EQUALITY IMPACT ASSESSMENT

Stage 1: Review of the Council's TaxiCard concessionary travel scheme	
Service	Infrastructure Services
Section	Public Transport Unit
Title of the activity etc.	Amendment of TaxiCard Scheme eligibility criteria in response to Introduction of PIP
Aims of the activity	<p>The TaxiCard Scheme provides discounted taxi and rail fares for physically disabled residents who are unable to use bus services or who have difficulty in doing so, due to lack of mobility. Residents who are in receipt of Higher Rate Mobility Component Disability Living Allowance (HRMC DLA) automatically qualify for a TaxiCard.</p> <p>There are 3,219 TaxiCard holders of which 893 (28%) of cardholders are eligible by virtue of receiving HRMC DLA.</p> <p>Under the Welfare Reform (Consequential Amendments) (Scotland) Regulations 2013, DLA is being replaced for those of working age (age 16-64) by Personal Independence Payments (PIP) which is phased in from June 2013. It is therefore necessary to extend the TaxiCard eligibility criteria to cater for disabled persons of working age.</p> <p>PIP will be phased in as follows:  <u>From 10 June 2013</u> – first-time claimants  <u>From October 2013</u> – individuals reporting a change in how a health condition or disability affects them and those reaching the end of an existing award of DLA  <u>From 2015</u> – everyone else receiving DLA.</p> <p>PIP assessments focus on an individual's ability to carry out key activities which are fundamental to everyday life. Based on government guidance, comments received from Social Work colleagues, and a comparison of the DLA and PIP assessments, it is considered that the closest match to the current TaxiCard eligibility criteria is: <b>People who score 8 points or more in the "Moving Around" activity and people who score 12 points or more in the "Planning and following journeys" activity.</b> It is therefore proposed to expand the TaxiCard scheme eligibility criteria accordingly.</p>

	<p>There will be no change to the TaxiCard administrative process. The applicant will continue to be required to provide a copy of their letter of benefit award.</p> <p>The proposed changes to the TaxiCard scheme aim to ensure that those individuals, and only those individuals, who currently meet the eligibility criteria for a TaxiCard will continue to do so.</p>
Author(s) & Title	Marion Mackay, Principal Officer (DRT, Fares & Ticketing)
Stage 2: List the evidence that has been used in this assessment.	
Internal data (customer satisfaction surveys; equality monitoring data; customer complaints).	<p>TaxiCard statistical report on (i) number of users of working age who are in receipt of HRMC DLA, and (ii) card expiry dates.</p> <p>We did not incorporate any questions regarding the proposed changes to eligibility criteria into the latest TaxiCard User Survey (issued Jan 2013). We didn't feel that it was appropriate to do because cardholders would be unlikely to provide an informed opinion given that it will only become fully apparent how PIP will affect individuals once they are assessed under the new system.</p>
Internal consultation with staff and other services affected.	<p>Susan Donald, Benefits Manager, Corporate Services Patricia Maclachlan, Head of Service (Older People &amp; Disabilities), Social Work Val Milne, Project Manager for IDEA, Social Work Lindsay Anderson, Occupational Therapy Team Manager, Social Work</p>
External consultation (partner organisations, community groups, and councils).	<p>Aberdeenshire Access Panels Whilst Central Aberdeenshire panel takes a lead role on the consultation of transportation matters, all four access panels were given the opportunity to comment.</p>

<p>External data (census, available statistics).</p>	<p>Department for Work and Pensions (DWP) Guidance on PIP, in particular:  <a href="http://www.dwp.gov.uk/publications/specialist-guides/PIP-toolkit/text-for-your-communications/#gi">http://www.dwp.gov.uk/publications/specialist-guides/PIP-toolkit/text-for-your-communications/#gi</a>  <a href="http://www.dwp.gov.uk/docs/PIP-editorial-for-local-authorities.doc">http://www.dwp.gov.uk/docs/PIP-editorial-for-local-authorities.doc</a>  <a href="http://www.dwp.gov.uk/docs/PIP-toolkit-factsheet-001-conditions-of-entitlement.pdf">http://www.dwp.gov.uk/docs/PIP-toolkit-factsheet-001-conditions-of-entitlement.pdf</a></p> <p>Scottish Government Transport Policy Directorate guidance on “PIP – Arrangements for passporting to the Blue Badge Scheme in Scotland” (letter dated 26 Feb 2013). Scottish Government commissioned factsheet on PIP produced by Child Poverty Action Group.</p> <p>DWP EIA on DLA reform:  <a href="http://www.dwp.gov.uk/docs/eia-dla-reform-wr2011.pdf">http://www.dwp.gov.uk/docs/eia-dla-reform-wr2011.pdf</a></p> <p>Improvement Service and Scottish Government’s Welfare Reform Implementation Support Programme  <a href="http://www.improvementservice.org.uk/welfare-reform-implementation-support-programme-wrisp/">http://www.improvementservice.org.uk/welfare-reform-implementation-support-programme-wrisp/</a></p> <p>Welfare Reform Scotland Knowledge Hub  <a href="https://knowledgehub.local.gov.uk/web/welfare-reforms-scotland">https://knowledgehub.local.gov.uk/web/welfare-reforms-scotland</a></p> <p>Comparison with eligibility criteria of other TaxiCard Schemes in Scotland.</p>
<p>Other (general information as appropriate).</p>	<p>The eligibility criteria for TaxiCard aims to be consistent with other transport-related schemes for disabled persons. Passporting arrangements are being put in place for the transfer from DLA to PIP for entitlement to government benefits such as Blue Badge and concessionary bus travel and these have been taken into account when considering the recommendation for the amendment to the TaxiCard Scheme eligibility criteria.</p> <p><u>The Blue Badge Scheme</u> is a national scheme which entitles disabled persons to park in designated parking spaces. Currently those in receipt of HRMC DLA automatically qualify for a Blue Badge. Under PIP, the following individuals will qualify for a Blue Badge: those in receipt of PIP at (i) 8 points or more for the “Moving Around” activity of the mobility component of PIP, or (ii) 12 points for the “Planning and following journeys” activity of the mobility component of PIP.</p>
	<p>The <u>Scotland-wide free travel scheme</u> is a national scheme administered by Transport Scotland which entitles older and disabled persons to free bus travel. Currently those in receipt of higher or middle rate care component or higher rate mobility component DLA may apply for a bus pass. It is proposed that any rate or component of PIP will provide entitlement to the scheme.</p>
<p>Stage 3: Evidence Gaps.</p>	

Are there any gaps in the information you currently hold?	No.
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**Stage 4: Measures to fill the evidence gaps.**

What measures will be taken to fill the information gaps before the activity is implemented? These should be included in the action plan at the back of this form.	Measures:	Timescale:

**Stage 5: Are there potential impacts on protected groups? Please complete for each protected group by inserting "yes" in the applicable box/boxes below.**

	Positive	Negative	Neutral	Unknown
Age – Younger			yes	
Age – Older			yes	
Disability			yes	
Race – (includes Gypsy Travellers)			yes	
Religion or Belief			yes	
Gender – male/female			yes	
Pregnancy and maternity			yes	
Sexual orientation – (includes Lesbian/ Gay/Bisexual)			yes	
Gender reassignment – (includes Transgender)			yes	
Marriage and Civil Partnership			yes	

**Stage 6: What are the positive and negative impacts?**

Impacts.	Positive (describe the impact for each of the protected characteristics affected)	Negative (describe the impact for each of the protected characteristics affected)
Please detail the potential positive and/or negative impacts on those with protected characteristics you have highlighted above. Detail the impacts and describe those affected.		
Stage 7: Have any of the affected groups been consulted?		
If yes, please give details of how this was done and what the results were. If no, how have you ensured that you can make an informed decision about mitigating steps?	<p>Aberdeenshire Access Panels emailed. The Chair of Central Aberdeenshire Access Panel indicated his support of the proposal on 11 April 2013. The other Aberdeenshire access panels (North, South and West) were advised of the proposals and encouraged to provide comments if they had concerns with the proposals. No concerns or queries were received.</p> <p>We have not consulted directly with TaxiCard customers as we believe that the proposals should have a neutral impact on them and it is unlikely that individual customers will know at this stage how the revised benefit arrangements might affect them.</p>	
Stage 8: What mitigating steps will be taken to remove or reduce negative impacts?		
These should be included in any action plan at the back of this form.	Mitigating Steps	Timescale
Stage 9: What steps can be taken to promote good relations between various groups?		

<p>These should be included in the action plan.</p>	<p>The proposed amendment to the eligibility criteria should not require the promotion of good relations between groups as the aim is to achieve an overall neutral impact.</p> <p>Any future general review of TaxiCard would include consultation with individuals from different groups.</p>
<p>Stage 10: How does the policy/activity create opportunities for advancing equality of opportunity?</p>	
<p>The extension of the eligibility criteria to include PIP is aimed at ensuring that those who currently meet the TaxiCard eligibility criteria will continue to do so following the transfer from DLA to PIP. This action aims to achieve an overall neutral impact.</p>	
<p>Stage 11: What equality monitoring arrangements will be put in place?</p>	
<p>These should be included in any action plan (for example customer satisfaction questionnaires).</p>	<p>From June 2013 the number of applications received from those awarded PIP will be monitored to compare with numbers previously received under HMCR DLA.</p> <p>From October 2013 individuals whose DLA letter is due to expire will be invited to apply for PIP. We will monitor the number of TaxiCard holders (of working age currently in receipt of DLA) applying to renew their cards. We will measure the number who meet the new criteria and the number who don't. It should however be noted that the DWP advises that the majority of DLA recipients will be unaffected until October 2015.</p> <p>We will also seek feedback from other Council services, Transport Scotland and other relevant groups or organisations on their experiences of the new arrangements. In particular we will seek to identify whether there are instances of individuals currently in receipt of HMRC DLA not meeting the new TaxiCard eligibility criteria (i.e. who are not awarded 8 or more points under the Moving Around activity of PIP).</p>

Stage 12: What is the outcome of the Assessment?													
Please complete the appropriate box/boxes	<table border="1"> <tr> <td style="text-align: center;">1</td> <td>No negative impacts have been identified – please explain.</td> </tr> <tr> <td colspan="2"> <p>Whilst the Improvement Services advises that it is estimated that less people in total will receive PIP than currently access DLA there is no evidence that those in receipt of HMRC DLA will be disadvantaged.</p> <p>Assuming that those cardholders with a physical disability currently in receipt of HMRC DLA were assessed in accordance with the DLA guidance then once they are assessed under PIP they should be awarded a minimum of 8 points for “moving around”. It is expected that those who received HMRC DLA because their understanding of the world precludes them from using public transport will be awarded a minimum of 12 points for “planning and following journeys”. This means that those of working age who automatically qualify for a TaxiCard by virtue of HMRC DLA should continue to automatically qualify for a TaxiCard.</p> </td> </tr> <tr> <td style="text-align: center;">2</td> <td>           Negative Impacts have been identified, these can be mitigated - please explain.            * Please fill in Stage 13 if this option is chosen.         </td> </tr> <tr> <td colspan="2" style="height: 40px;"></td> </tr> <tr> <td style="text-align: center;">3</td> <td>           The activity will have negative impacts which cannot be mitigated fully – please explain.            * Please fill in Stage 13 if this option is chosen         </td> </tr> <tr> <td colspan="2" style="height: 80px;"></td> </tr> </table>	1	No negative impacts have been identified – please explain.	<p>Whilst the Improvement Services advises that it is estimated that less people in total will receive PIP than currently access DLA there is no evidence that those in receipt of HMRC DLA will be disadvantaged.</p> <p>Assuming that those cardholders with a physical disability currently in receipt of HMRC DLA were assessed in accordance with the DLA guidance then once they are assessed under PIP they should be awarded a minimum of 8 points for “moving around”. It is expected that those who received HMRC DLA because their understanding of the world precludes them from using public transport will be awarded a minimum of 12 points for “planning and following journeys”. This means that those of working age who automatically qualify for a TaxiCard by virtue of HMRC DLA should continue to automatically qualify for a TaxiCard.</p>		2	Negative Impacts have been identified, these can be mitigated - please explain. * Please fill in Stage 13 if this option is chosen.			3	The activity will have negative impacts which cannot be mitigated fully – please explain. * Please fill in Stage 13 if this option is chosen		
	1	No negative impacts have been identified – please explain.											
	<p>Whilst the Improvement Services advises that it is estimated that less people in total will receive PIP than currently access DLA there is no evidence that those in receipt of HMRC DLA will be disadvantaged.</p> <p>Assuming that those cardholders with a physical disability currently in receipt of HMRC DLA were assessed in accordance with the DLA guidance then once they are assessed under PIP they should be awarded a minimum of 8 points for “moving around”. It is expected that those who received HMRC DLA because their understanding of the world precludes them from using public transport will be awarded a minimum of 12 points for “planning and following journeys”. This means that those of working age who automatically qualify for a TaxiCard by virtue of HMRC DLA should continue to automatically qualify for a TaxiCard.</p>												
	2	Negative Impacts have been identified, these can be mitigated - please explain. * Please fill in Stage 13 if this option is chosen.											
3	The activity will have negative impacts which cannot be mitigated fully – please explain. * Please fill in Stage 13 if this option is chosen												
* Stage 13: Set out the justification that the activity can and should go ahead despite the negative impact.													

Stage 14: Sign off and authorisation.				
Sign off and authorisation.	1) Service and Team	Infrastructure Services- Public Transport Unit		
	2) Title of Policy/Activity	Review of TaxiCard Scheme eligibility criteria in response to Benefit Reform		
	3) <b>Authors:</b> I/We have completed the equality impact assessment for this policy/activity.	Name: Marion Mackay Position: Principal Officer Date: 23/04/13 Signature:	Name: Position: Date: Signature:	
		Name: Position: Date: Signature:	Name: Position: Date: Signature:	
	4) Consultation with Service Manager	Name: Richard McKenzie Date: 23/04/13		
	5) Authorisation by Director or Head of Service	Name: Ewan Wallace Position: Head of Transportation Date: 24/04/13	Name: Position: Date:	
	6) If the EIA relates to a matter that has to go before a Committee, Committee report author sends the Committee Report and this form, and any supporting assessment documents, to the Officers responsible for monitoring and the Committee Officer of the relevant Committee. e.g. Social Work and Housing Committee.			Date: 24/04/13
	7) EIA author sends a copy of the finalised form to: eia@abdnshire			Date:
(Equalities team to complete) Has the completed form been published on the website? YES/NO			Date:	

Action Plan						
Action	Start	Complete	Lead Officer	Expected Outcome	Resource Implications	
Update procedures for TaxiCard applications. If appropriate residents to be directed to the Scottish Welfare Fund administered by the Council.	May 2013	May 2013	Heather Dey Senior Transport Officer	Depending upon circumstances, the Council may be able to assist individuals financially.	Unknown – depends upon whether funding granted.	
Monitor first-time TaxiCard applications from individuals awarded PIP and compare with numbers of applications under DLA.	June 2013	March 2014	Marion Mackay Principal Officer	A comparison in numbers to show whether there is a significant increase or decrease in applications compared to previous trends.	Negligible. (Staff time).	
Monitor TaxiCard renewal applications from residents who currently hold HMRC DLA.	October 2013	March 2014 (ongoing if necessary)	Marion Mackay Principal Officer	An understanding of whether any individuals have been impacted negatively and if so an indication of scale.	Negligible. (Staff time).	
Seek feedback from other Council services (e.g. Benefits Team and Social Work), Transport Scotland, Access Panels and other appropriate groups or organisations regarding knowledge or experience of individuals losing out under PIP relevant to the TaxiCard Scheme.	March 2014	March 2014	Marion Mackay Principal Officer	An understanding of whether individuals have been impacted negatively and if so an indication of scale.	Negligible. (Staff time).	

Action Plan						
Consider whether a review of the TaxiCard eligibility criteria is required should issues arise as a result of the implementation of PIP.	Jan 2014 2013	March 2014	Marion Mackay Principal Officer	An opportunity to amend the TaxiCard eligibility criteria in light of experience if required.	Negligible. (Staff time).	

APPENDIX 2

**Proposals for Determining TaxiCard Eligibility using Personal Independence (PIP) Award Notifications**

**People who score 12 points in the “Planning and Following Journeys” activity are eligible**

	Mobility Activities: Planning and Following Journeys PIP Assessment Decision	Points	Eligible for TaxiCard and Blue Badge
A	I've decided you can plan and follow a route of a journey unaided.	0	no
B	I've decided you need prompting from another person to undertake a journey to avoid causing you significant mental distress.	4	no
C	I've decided you can't plan the route of a journey.	8	no
D	I've decided you need another person, assistance dog or orientation aid to follow the route of an unfamiliar journey.	10	no
E	I've decided you can't undertake any journey because it would cause you significant mental distress.	10	no
F	I've decided you can't follow the route of a familiar journey without another person, assistance dog or orientation aid.	12	yes

**People who score 8 points or more in the “Moving Around” activity are eligible.**

	Mobility Activities: Moving Around PIP Assessment Decision	Points	Eligible for TaxiCard and Blue Badge
A	I've decided you can plan and follow a route of a journey unaided.	0	no
B	I've decided you can stand and then move more than 50m but no more than 200m.	4	no
C	I've decided you can stand and then move unaided more than 20m but no more than 50m.	8	yes
D	I've decided you can stand and then move using an aid or appliance more than 20m but no more than 50m.	10	yes
E	I've decided you can stand and then move more than 1m but no more than 20m.	12	yes
F	I've decided you cannot stand or move more than 1m.	12	yes



## APPENDIX 3

### TaxiCard Scheme Eligibility Criteria

#### Current Criteria and number of cardholders

Total cards = 3,219

- those eligible for Higher Mobility component Disability Living Allowance (or would be, but precluded because permanently resident in long stay hospital) = 909 cardholders (28.2%)
- those in receipt of War Pensioners Mobility Supplement = 5
- those who are registered blind or partially sighted = 269 (8.4%)
- those aged 65 years or over who have a permanent and severe physical disability which prevents the use of conventional bus services = 2036 (63.3%)

#### Proposed Additional Criteria

- those who receive mobility component of Personal Independence Payment awarded at (i) 8 points or more for “moving around” or (ii) 12 points or more for “planning and following journeys”

### TaxiCard Scheme Benefits

#### Taxi

TaxiCard holders are entitled to a maximum of 52 single TaxiCard trips per three calendar months (which equates to two return trips per week).

For trips costing up to £10: the passenger pays one half of the normal fare.

For trips costing over £10: the passenger pays the full fare less £5.

#### Rail

TaxiCard holders are entitled to travel at half of the normal adult standard single, day return or saver fare on all rail services operating within and between Aberdeenshire and Aberdeen, and beyond to/from Nairn and Montrose. There is no limit on the number of journeys. Holders of a Blind Persons TaxiCard travel free on rail services operating within the boundary of the national travel scheme.