

## F1457 A1 Equality Impact Assessment (EqIA) form

N.B: the completed form should be emailed to the [Diversity and Inclusion team](#)

<b>Project *</b> <b>Programme</b> <b>Strategy</b> <b>Policy*</b>	Introduction of Annual eligibility checks for the TfL 60+ Concessionary scheme
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	Signature	Date

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To be used in conjunction with: G1060

Document	Version	Date	Summary of changes
<b>History</b>	0.1	15/02/2019	First draft
	0.2	15/03/2019	Second draft
	0.3	13/5/2019	Final

<b>Project Related Documents</b>	Doc No.	Document title	Relevant Section(s) of this Document



## Step 1: Clarifying Aims

### Q1. Outline the aims/objectives/scope of this piece of work

#### Purpose

This project is to introduce annual eligibility checks and an associated £10 annual validation fee for customers joining the TfL 60+ concessionary scheme after June 2019, who would become liable to pay their first new fee in June 2020.

The rationale for the change is:

- a) To mitigate the risk of misuse of the concession now that a new card issued to someone turning 60 will last for up to 6 years and 2 months;
- b) To make a contribution to the cost of running the scheme, in the same way that the existing £20 initial application fee does.

#### Background

The 60+ scheme was introduced in 2012. Currently, applicants pay a single administration fee of £20 to get a 60+ Oyster photocard which gives them free travel in London for up to six years and two months.

To be eligible for a 60+ Oyster photocard, the applicant must be 60 or over (but not yet eligible for an Older Persons or Disabled Freedom pass) and live in a London borough. Age and residency is currently validated once, at the point of application.

There are currently 312,000 60+ cardholders, and this is expected to grow to 415,000 by August 2020, when the entitlement age for an Older Person's Freedom pass will be fixed at 66 (it is currently increasing as dictated by UK Government policy).

When the scheme was launched, the average length of validity wfor a 60+ card was around one year. Today, a new card will last six years and two months. This growth in the length of validity has increased the likelihood of a 60+ card being incorrectly used by someone who is no longer resident in the London area, and has caused us to consider whether the controls offered by the processes put in place in 2012 remain adequate.

**Q2. Does this work impact on staff or customers? Please provide details of how.**

At this stage, we're only making this change for new applicants from June 2019. The first annual revalidation will occur in June 2020.

The revalidation process would require customers to sign into their 60+ online account set up during their application, and provide up to date proof of address. Customers would be reminded to do this with plenty of time to act and ensure their concession continues. Customers not responding would have their card stopped.

A £10 administration charge will be levied, lower than the £20 initial application fee to reflect the fact that a new card is not being produced. The small number of customers who first apply for their 60+ card by phone will be offered an alternative renewal process that does not require them to go online.



## Step 2: The Evidence Base

**Q3. Record here the data you have gathered about the diversity of the people potentially impacted by this work. You should also include any research on the issues affecting inclusion in relation to your work**

Consider evidence in relation to all relevant protected characteristics;

- Age
- Disability including carers<sup>1</sup>
- Gender
- Gender reassignment
- Marriage/civil partnership
- Other – refugees, low income, homeless people
- Pregnancy/maternity
- Race
- Religion or belief
- Sexual orientation

The 60+ scheme is open to those Londoners aged 60 or over but not yet eligible for an Elderly Freedom pass.

GLA figures based on ONS long term projections

(<https://data.london.gov.uk/dataset/gla-population-projections-custom-age-tables> )

indicate that in 18/19 there are 365k Londoners eligible for the 60+ scheme.

TfL figures (7/1/19) show that there are 312k 60+ cards in circulation.

ONS figures

(<https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/employmentandemployeetypes/datasets/headlinelabourforcesurveyindicatorsforlondonhi07>) show

that 3.5% of Londoners aged between 50-64 years old are unemployed. On that basis the assumption is that 60+ cards are held predominantly by employed people.

London Councils, who administer the Freedom Pass, periodically operate a process of checking names and addresses of card holders with data matching agencies to try and establish when cardholders have moved and become ineligible. However, their experience tells us this is far from perfect. In the context of the 60+

<sup>1</sup> Including those with physical, mental and hidden impairments as well as **carers** who provide unpaid care for a friend or family member who due to illness, disability, or a mental health issue cannot cope without their support

## Step 3: Impact

**Q4. Given the evidence listed in step 2, consider and describe what potential short, medium and longer term negative impacts this work could have on people related to their protected characteristics?**

Protected Characteristic		Explain the potential negative impact
Age	Y	The 60+ group may not be able to afford to pay the £10 annual fee
Disability including carers	N	
Gender	N	
Gender reassignment	N	
Marriage/civil partnership	N	

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<p><b>Other – e.g. refugees, low income, homeless people</b></p>	<p><b>N</b></p>	
<p><b>Pregnancy/maternity</b></p>	<p><b>N</b></p>	
<p><b>Race</b></p>	<p><b>N</b></p>	
<p><b>Religion or belief</b></p>	<p><b>N</b></p>	
<p><b>Sexual orientation</b></p>	<p><b>N</b></p>	



**Q5. Given the evidence listed in step 2, consider and describe what potential positive impacts this work could have on people related to their protected characteristics?**

Protected Characteristic		Explain the potential positive impact
<b>Age</b>	<b>Y</b>	Only those eligible for the 60+ scheme are in possession of the travel concession therefore safeguarding the concession for all.
<b>Disability including carers</b>	<b>N</b>	
<b>Gender</b>	<b>N</b>	
<b>Gender reassignment</b>	<b>N</b>	
<b>Marriage/civil partnership</b>	<b>N</b>	



<p><b>Other – e.g. refugees, low income, homeless people</b></p>	<p><b>N</b></p>	
<p><b>Pregnancy/maternity</b></p>	<p><b>N</b></p>	
<p><b>Race</b></p>	<p><b>N</b></p>	
<p><b>Religion or belief</b></p>	<p><b>N</b></p>	
<p><b>Sexual orientation</b></p>	<p><b>N</b></p>	



## Step 4: Consultation

### Q6. How has consultation with those who share a protected characteristic informed your work?

List the groups you intend to consult with or have consulted and reference any previous relevant consultation? <sup>2</sup>	If consultation has taken place what issues were raised in relation to one or more of the protected characteristics?
Internal consultation is taking place with a range of individuals from different business areas including Legal	
In advance of the introduction we would notify the following stakeholders: London Assembly London Boroughs London Travelwatch Age UK Alzheimer's Society Travel for All London Vision	
TfL has submitted the proposal to City Hall.	

<sup>2</sup> This could include our staff networks, the Independent Disability Advisory Group, the Valuing People Group, local minority groups etc.

**Q7. Where relevant, record any consultation you have had with other projects / teams who you are working with to deliver this piece of work. This is really important where the mitigations for any potential negative impacts rely on the delivery of work by other teams.**

N/A

## Step 5: Informed Decision-Making

**Q8. In light of the assessment now made, what do you propose to do next?**

Please select one of the options below and provide a rationale (for most EqIAs this will be box 1). Please remember to review this as and when the piece of work changes

<p><b>1. Change the work to mitigate against potential negative impacts found</b></p>	
<p><b>2. Continue the work as is because no potential negative impacts found</b></p>	
<p><b>3. Justify and continue the work despite negative impacts (please provide justification)</b></p>	<p>As ONS figures show that 3.5% of Londoners aged between 50-64 years old are unemployed. On that basis the assumption is that 60+ cards are held predominantly by employed people.</p> <p>The concession still remains excellent value, with an average cardholder making journeys worth more than £250 a year.</p>

4. Stop the work because discrimination is unjustifiable and no obvious ways to mitigate	

### Step 6: Action Planning

**Q9. You must address any negative impacts identified in step 3 and 4. Please demonstrate how you will do this or record any actions already taken to do this. Please remember to add any positive actions you can take that further any positive impacts identified in step 3 and 4.**

Action	Due	Owner

### Step 7: Sign off



<b>Signed Off By</b>	<b>EQIA Author</b>	Rosalia Vivone T&D Product Manager (Payments)
	Signature	Date
	<b>EQIA Superuser</b>	Name Job Title
	Signature	Date
	<b>Senior accountable person</b>	Mike Tuckett Head of Payments (T&D)
	Signature	Date
	<b>Diversity &amp; Inclusion Team Representative</b>	Name Job Title
	Signature	Date

