



Consultation on Free Bus Travel for Older and Disabled People and Modern Apprentices – SAMH Submission

Introduction

SAMH is the Scottish Association for Mental Health. Around since 1923, SAMH operates over 60 services in communities across Scotland providing mental health social care support, homelessness, addictions and employment services, among others. These services together with our national programme work in See Me, respectme, suicide prevention, sport and physical activity inform our public affairs work to influence positive social change.

SAMH welcomes the opportunity to respond to this consultation. Our submission focuses on the provision and impact of free bus travel for people with mental health problems. The response is informed by the views of 123 SAMH service users and others living with mental health problems who completed a SAMH survey on concessionary travel and mental health.

SAMH welcomes the commitment from the Scottish Government that they have no plans to adversely change disability eligibility criteria.

Summary and Recommendations

- **Free bus travel has a positive impact on people with mental health problems. It promotes independence; reduces social isolation; and facilitates engagement with health and social care services**
- **The application process for the National Entitlement Card (NEC) should be simplified. SAMH believes the Scottish Government and local authorities must do more to actively promote the scheme to people with mental health problems including signposting to support to complete the application.**
- **SAMH believes National Entitlement Cards, should run indefinitely unless there is a change in circumstances of the holder, impacting their ability to travel**
- **SAMH believes there should be changes to eligibility to the scheme on grounds of mental health**
 - **GPs should be included in the list of authorised signatures for the NCT002 form**
 - **Consideration should be given to moving from a diagnosis led model to one requiring only the authorised signature of a health or social care professional where a person's ability to travel is impacted by their mental health.**
- **SAMH believes that following the devolution of disability assistance (currently PIP and DLA) provision of a National Entitlement card should be automatic once a disability benefit is awarded. There should be no requirement for the person to make a separate application for an entitlement card.**
- **SAMH calls for everyone eligible for a National Entitlement Card due to disability to receive the companion provisions. Companion provision allow free travel for an additional**

adult when required. For example free travel for a support worker to support the pass holder to appointments.

Impact of Free Bus travel on mental health and wellbeing

Access to travel is essential for engaging with the community, accessing health and social care services and promoting good mental health and wellbeing. All respondents who left comments on our survey about the impact of their bus pass on their wellbeing stated it had a positive impact on their lives. Key themes raised were the positive impact of free bus travel on reducing social isolation; increasing independence; reducing anxiety around finances; and helping people attend health and social care appointments, services and leisure activities.

Comments from respondents included:

“It’s made accessing services for my mental health easier, it means I’m able to go to support groups or activities without having to worry about affording travel. If I didn’t have it I wouldn’t be able to go to groups or supports, it’s helped me feel less isolated.”

“I wouldn’t go out if I didn’t have it. It’s part of my support plan to use public transport with my support worker”

“I really do not know where I would be without it. It not only allows me to travel free but allows me to get to places I may not normally go if I didn’t have a card. The card is part of me in a sense.”

“It lets me get out and about and stops me being stuck in my house. When I don’t get out I get depressed”

“The bus pass has meant I can get to places I needed to be for free. Which means that when there where service, like my old art group, I could get there. Sometimes I can use my bus pass as proof of my having a disability. My bus pass is and has all ways been a way of me having a life.”

Findings from our survey broadly support findings from the Concessionary Travel Customer Feedback Research Year Two Report, published 2014. This report outlined the positive impact access to free and concessionary travel has for people living with disabilities.¹ The research found disabled national entitlement card (NEC) holders ranked “independence” and “freedom” as the most important benefits of the scheme.² In regards to mental wellbeing, 63% of respondents stated that the concessionary travel card helps them maintain, or improve, their sense of mental wellbeing.³

Application process

Worryingly a fifth of people who responded to our survey found the application process difficult. Just under half (48%) found the process easy.

“It took years for me to complete the form. At first I didn’t know about it. Then I couldn’t get one. then i forgot to do it. Then I had to get photo’s. In then end I got help from Number 6 Autism initiatives.”

¹ Transport Scotland [Concessionary Travel - Customer Feedback Research Year Two Report](#) 2014

² Transport Scotland [Concessionary Travel - Customer Feedback Research Year Two Report](#) 2014

³ Transport Scotland [Concessionary Travel - Customer Feedback Research Year Two Report](#) 2014

A significant majority (71%) of people required assistance when applying for (or renewing) a bus pass. The most commonly cited form of supports were mental health support worker (e.g. SAMH support worker); Community Psychiatric nurse (CPN); and library staff. Over four fifths (81%) of people responding were currently in receipt of a mental health service, either from the NHS or third sector. This may explain why such a high proportion of respondents had access to support when applying. SAMH is concerned that people who are not in receipt of health or social care services, but who are eligible for the concessionary travel scheme may not know where to go to receive support in applying.

SAMH believes the Scottish Government and local authorities must do more to actively promote the scheme to people with mental health problems including signposting to support to complete the application.

Renewal

National Entitlement Cards issued on grounds of disability have an expiry date and must be renewed on a regular basis. The length of time a card is issued for varies depending on the card holders eligibility.⁴ A number of people who completed our survey felt the renewal process was too frequent.

“[Want it] to last longer so I do not need to keep reapplying”

“Make it easier to renew by only having to resubmit evidence of disability or illness when there are significant changes to condition.”

SAMH believes National Entitlement Card provision should be indefinite. We call on the Scottish Government to change entitlement rules so the card only need renewed if there is a change in circumstances of the holder, impacting their ability to travel.

Eligibility and Mental Health

People with a mental health disorder recognised by The Mental Health (Care and Treatment) (Scotland) Act 2003 can be eligible for a National Entitlement Card.⁵ To be eligible the person must be a Scottish resident, have had a diagnosis for more than a year and must have to travel to health or social care appointments.⁶ Local authorities administer applications. To apply a NCT002 form must be completed, signed by an authorised signatory and submitted to the local authority.⁷

Authorised signatories must be from one of the following:

- Psychiatrist
- Community psychiatric nurse
- Educational psychologist
- Head Teacher of a Special School
- Occupational Therapist

⁴ South Lanarkshire Council [National Entitlement Card Disabled People](#) [accessed November 2017]

⁵ Transport Scotland [Concessionary Travel – 60+ and disables](#) [accessed November 2017]

⁶ Transport Scotland [Concessionary Travel – 60+ and disables](#) [accessed November 2017]

⁷ See http://publications.fifedirect.org.uk/c64_fifedirectmentalhealthletterandcertmarch14.pdf for an example of a NCT002 form (Fife council).

- Mental Health Officer
- Social Worker – specialising in mental health
- Clinical psychologist
- Support Service manager
- Day Service manager

A GP cannot be an authorised signatory. SAMH would like the list of authorised signatory to be increased to include the persons GP. A large number of people, who would fall under the qualification criteria, manage their mental health through their GP rather than mental health services.

Of those who responded in our survey 70% were aware of eligibility for a National Entitlement Card on grounds of mental health. It is concerning that 30% were not. SAMH believes the Scottish government and local authorities must do more to promote the scheme to people with mental health problems.

“Make people who are genuinely suffering and need it, aware that it exists. You shouldn't have to find out for yourself and ask for it - CPN's and GP's should point it out. I happened to find out by chance in a conversation with a skills development officer and asked about it. I struggled for years before then and I should have had it earlier. It can be thought of as a physical disabilities card and not linked to mental health.”

Consideration should also be given to moving from a diagnosis led model. An authorised signature from a health or social care professional should be enough evidence of eligibility even where the person does not have a formal diagnosis recognised by The Mental Health (Care and Treatment) (Scotland) Act 2003. This in line with the aspiration from the Mental Health Strategy for a non-exclusionary rights based approach to actions to improve mental health.⁸

Social Security Bill and Concessionary travel

The Policy Memorandum for the Social Security (Scotland) Bill (paragraph 127) states that the Scottish Government is committed to retaining all existing passporting arrangements for PIP, DLA and AA when responsibility for the benefits transfers to Scotland. SAMH welcomes this commitment but would like to see a further commitment guaranteeing free access to public transport as a right for all eligible to disability benefits under Scottish jurisdiction.

The process for gaining free travel should be automatic and part of the initial benefit award, not requiring additional applications by the person in receipt of PIP or a Scottish replacement benefit. There may be benefit in looking at the Young Scot card, which gives holders discounted travel, as a possible model.

Companion Card

Respondents to our survey welcomed access to free companion travel as part of their National Entitlement Card, when they qualified. The impact of their mental health meant that many could not travel alone so relied on support to access services and the wider community:

⁸ Scottish Government [Mental Health Strategy:2017-2027](#)

"I have the companion care on my card so if I feel I needed to bring my support workers or family to an appointment, I don't have the worry that they would be out of pocket and using their own money."

"companion allows me to feel supported when travelling"

We asked people completing our survey what changes they would like to see to the National Entitlement Card. Of the 41 who left suggestions 6 people (15%) wanted access to companion cards widened.

"I would like to have a companion on my bus pass so my support worker doesn't have to pay when I have to attend appointments"

"Companion passes should also be available for everyone with an entitlement card. Even if they do not use it all the time as it is still company/companionship for the person who needs it."

SAMH calls for everyone eligible for a National Entitlement Card due to disability to receive the companion provisions.

Craig Smith Public Affairs Officer SAMH