Door to Door Call for Evidence

CTA Response
Executive Summary

The Community Transport Association (CTA) is a national charity that leads and supports thousands of other local charities and community groups across the UK that all provide transport services that fulfil a social purpose and community benefit.

We are the UK’s leading authority on the practice and performance of community transport, enhancing the development of public policy where community-led transport solutions can improve access and inclusion.

We are for, and about, accessible and inclusive transport.

Community transport is one of the most popular forms of transport in the Capital, and providers more passenger trips than Dial-a-Ride, Taxicard or Capital Call Services.

Although our response looks particularly at community transport we have used our expertise in working with people excluded from the mainstream transport network to look at some of the broader issues and opportunities in introducing personal budgets, in line with the terms of reference of this inquiry.

Ultimately, we believe that the investigation will be successful if it delivers a resolution that allows more people to access transport services, ensures the sustainability of current services, and makes efficiency savings to the public purse.

In responding to this investigation we have arrived at a number of conclusions and principles for the transport committee to consider.

- The success of a new funding regime should be judged on whether those who rely on London’s door to door services are able to continue living the lives they choose to lead, supported by a financial arrangement that is accessible, supported, and balances risks. The success of any changes to door to door services that are developed as a result of this investigation should ultimately be measured based on the feedback of service users about its impact on their lives.

- The investigation toward personalised budgets should look at wider social benefits beyond opportunities for monetary savings. In particular, looking at how personal budgets can facilitate access to other transport modes such as train services. The investigation should therefore be framed in terms of allowing individuals a greater range of travel options rather than reducing the current service availability based on cost saving.
Caution needs to be taken to ensure a move toward personal budgets does not have a negative impact on the financial viability of communal transport. The financial structure of community transport in particular means it can provide services where it would be unprofitable for commercial services to do so. There is a risk that personal budgets could cause a disparate funding system that limits the travel options of some of London's least mobile citizens.

This response covers the questions raised in the investigation, with a particular emphasis on the impact of proposals on those who use community transport.

We are happy to provide oral evidence to the committee if required. Further questions should be directed to:

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Risk and Opportunities in Introducing Personal Budgets

The Joseph Rowntree Foundation in their report, *Whose risk is it anyway? Risk and regulation in the era of personalisation* describe the move toward personal budgets as

‘Seek[ing] to recast users of state welfare away from being passive recipients of pre-purchased services towards a situation where they are active citizens with a right to control and shape their own support’

In turn they describe the recipients of personal budgets as ‘micro-commissioners.’ It is therefore necessary to consider whether the introduction of personal budgets will enable citizens to access a greater range of transport services, and how this new commissioning relationship will impact individual economic agency.

Inherent in introducing this economic freedom is an element of risk. Community transport provides 1.9m journeys across London, more than Dial-a-Ride, Taxicard or Capital Call Services. It is often those who would be otherwise unable to access commercial services that are reliant on this provision.

If there is a transition to personal budgets it is should be mindful of its impact on communal services that rely on a unique regulatory system that limits commercial activity. For example, the National Association for Voluntary and Community Action highlight reports where personal budgets have been misappropriated moving spending away from the services they are intended.

It is important the committee consider how change in demand could disproportionately affect services such as community transport where they would be unable to change their business model to provide services without or with less up-front subsidy.

As has also been noted elsewhere the introduction of personal budgets brings in risks for individuals dealing with a new system. We address this further below but it is worth noting here that the unique funding arrangements for community transport could add an additional layer of complexity compared to other services, depending on brokerage arrangements.

In particular, we would encourage the committee to consider where personal travel budgets have been introduced for SEN in schools. Bournemouth Borough Council

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2. [https://www.navca.org.uk/assets/000/000/192/Personal_Health_Budgets_original.pdf?1470312092](https://www.navca.org.uk/assets/000/000/192/Personal_Health_Budgets_original.pdf?1470312092)
3. [https://www.theguardian.com/society/2013/feb/12/are-social-care-personal-budgets-working](https://www.theguardian.com/society/2013/feb/12/are-social-care-personal-budgets-working)
provided a particularly detailed document outlining a range of options flexible budgets can be used for⁴

⁴ http://www.bournemouth.gov.uk/childreneducation/LocalOffer/AdviceSupport/Leaflets/Personal-Budgets-Direct-Payments.pdf
Administering Personal Budget to Enhance Opportunities

Personal budgets will present new administrative challenges to TfL. In particular, as the Social Care Institute for Excellence stated in a 2009 briefing:

‘Older people and people with complex needs may need greater time and support to help them get the most from individual budget schemes, particularly the cash direct payment issue.’

This reflects a sentiment shared with us by one a CTA member working outside of London who told us that the allocation for personal budgets often:

‘does not recognise the complexities of transport in terms of getting those passengers with large wheelchairs on and off buses as opposed to ambulance passengers. This incurs extra cost due to time and space on board the bus, plus the cost of escorts’

In order for personal budgets to be administered and managed effectively in a way that fosters the sustainability of community transport it is therefore necessary to consider the administration of funds, and the process by which personal payments are brokered.

Some have argued that it is vital that passengers who are elderly and/or with disabilities are provided with a higher level of support in administrating personal budgets.

This is a particular issue for the providers of community transport who provide services to predominantly older service users. Therefore, to ease the transition to a new regime it will be necessary to ensure there is an effective administration system is in place to reduce the potential impact on community transport operators.

In spite of these challenges we believe that the way personal budgets are administered can give opportunity to improve the quality of life of London’s residents. In particular, in providing new opportunities access London Underground and Overground services.

In CTA’s response to the Transport Select Committee’s, Improving the Rail Passenger Experience Inquiry, we noted that community transport can provide a key link to rail services as it is generally more flexible than mainstream services. We further stated

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5 http://www.scie.org.uk/publications/briefings/briefing20/
6 https://www.theguardian.com/society/2013/feb/12/are-social-care-personal-budgets-working
that this is possible where there is a good provision of information, joined up ticketing and feedback mechanisms in place that looked specifically at service accessibility.

We believe that there is an opportunity to use brokerage as a means of achieving some of these aims. In particular, where there is proper support brokerage systems can potentially be used to manage the purchase of integrated tickets. The development of any new funding system should centre the experience of service users, and as such feedback should be sought on how any new arrangements have furthered the mobility of London's residents.

One way of achieving this could also be through allowing multiple contributions to personal budgets. Providing individuals are able to choose how they are given personal budgets (whether through brokerage, direct payment, or other supported services) it should be possible to allow family members and other agencies to pay into personal transport budgets.

In spite of these positives it has been brought to our attention that in one case outside of London the use of personal budgets to pay for transport has created an additional administrative burden through managing payments. This could present an issue to smaller community transport providers and these should be supported to manage any changes.
Community Transport, Personal Budgets and Changing Needs

One of the issues that personal budgets will present to community transport operators from a business point of view is that they have the potential to disrupt demand. One of the pioneers of personal budgets, Simon Duffy, noted that, in Control’s experience of personal budgets, individuals used them to ‘build community not to shop’⁹.

The allocation of personal budgets is complex and fraught with the potential for misapplication which could cause great harm. Duffy further notes that:

‘At best, a person’s plan is just one way of getting some rather limited evidence that the person, or their representative, is able to manage their own budget and can be trusted to get on with living their life.’¹⁰

We believe it is therefore important that individuals should have flexibility in deciding the way their own budget is spent. This presents a risk for community transport providers in that they may choose to spend this money on another service. To reduce this risk we believe that any new system should enable individuals to continue spending this fund as before, should they choose to do so.

Community transport is unique in the way it based in local communities and operates on a not-for-profit basis. The relationships between individuals and community transport operators makes these services vital to many people’s social wellbeing. We are confident that even with personal budgets people would choose to keep using community transport, but it is necessary that administrative systems makes this as simple as possible.

Age UK highlight that in personal budgets for social care older people tend to, ‘understate their needs and overstate their abilities.’¹¹ It seems likely this would also be the case in assessing transport needs. We believe that it is necessary to properly assess the potential uptake of personal budgets with a criteria that improves access to communal transport. The results of the investigation should improve access to transport and in turn support individuals to overcome current travel barriers.

A CTA member provided feedback to CTA that one of the risks of personal budgets is that the disperse payment methods could lead to an underfunding of communal services. As London’s population grows and its average life expectancy increases it is

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⁹ https://www.sochealth.co.uk/2015/09/02/will-personal-health-budgets-destroy-the-nhs/
¹⁰ http://www.centreforwelfarereforeform.org/library/authors/Simon-duffy/an-apology.html
¹¹ http://www.ageuk.org.uk/Documents/EN-GB/For-professionals/Care/Personalisation_in_practice-lessons_from_experience.pdf?dtrk=true
likely services such as community transport will become increasingly necessary. The introduction of personal budget should be developed with long-term needs in mind, with a framework that still provides central support to services such as community transport.
Conclusion

We believe that the introduction of personal budgets has the potential to improve the opportunities to access travel for London's residents. This has to be carefully balanced against the often difficult administrative burdens that can have an adverse effect, overly onerous assessments that discourage take up, and a need to maintain communal funding in an individual funding system.

For community transport, personal budgets present a mixture of risks and rewards. On the one hand, research from AGE UK and the Joseph Rowntree Foundation suggest that those most likely to be negatively impacted by poor administration of personal budgets are those most likely to use community transport. In addition, the unique relationship between community transport users and providers may often mean they want their services to remain the same, without an additional layer of bureaucracy. On the other hand, the new system could enable new funding for the sector, greater flexibility for service users, and for unfulfilled transport needs to be met by community transport operators.

The success of the move toward personal budgets will be dependent on the fundamental question of whether more people can access the transport they need, and whether that transport is of quality to meet their needs. Community transport operators work 365 days a year to ensure people can get to where they need to be.

The move toward personal budgets should empower this through connecting services, supporting new people to use these services, and increasing patronage. It should not discourage use through overly burdensome administration, lack of support, or a reduction in central funding.