



# Consultation on the use of section 19 and section 22 permits for road passenger transport in Great Britain (Department for Transport)

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## **About Age UK**

Age UK is a national charity that works with a network of partners, including Age Scotland, Age Cymru, Age NI and local Age UKs across England, to help everyone make the most of later life, whatever their circumstances. In the UK, the Charity helps more than seven million older people each year by providing advice and support. It also researches and campaigns on the issues that matter most to older people. Its work focuses on ensuring that older people: have enough money; enjoy life and feel well; receive high quality health and care; are comfortable, safe and secure at home; and feel valued and able to support older people globally in over 30 developing countries by funding programmes such as vital emergency relief and healthcare and campaigning to raise awareness and change policies.

## **About this consultation**

In February 2018

There have also been fundamental questions raised about the legal interpretation of the proposed guidance, which suggests that in specified circumstances commercial and voluntary transport services should be put on an equal footing. Despite this, the DfT consultation provides reassurance that the majority of community transport operators will be unaffected due to a number of exemptions to the re-categorisation of not-for profit operators to commercial status. It says the consultation is designed to gather information to further determine the impact of the proposed guidance to arrive at a workable position. The Government has previously said it fully supports the community transport sector and has provided substantial funding to allow voluntary agencies to purchase minibuses.

## 1. Key points and recommendations

The **closure or reduction** of voluntary transport services that help vulnerable older people, as a result of changes in the Department of Transport licensing guidance is **completely unacceptable** to Age UK

A **thriving community transport sector is absolutely vital** to enabling older people to access essential services including hospital treatment, day care and other key services - particularly in rural places. It has been a key component of s on access to services for the most vulnerable groups.

Where transport services are not the main function of a charity, as is the case with local Age UKs, they should be protected and **completely exempt** from any additional licencing costs beyond the current requirements.

Age UK is concerned by the possibility that changes to the proposed licensing guidance appear to require that all paid drivers obtain a Driver Certificate of Competence (CPC). If this is the case, any additional cost involved could have a **devastating effect on transport services** offered by many local Age UKs, and no doubt many other similar organisations.

Specific consideration needs to be given to voluntary transport services using **part-time drivers** who are often difficult to recruit. Regardless of any additional cost these drivers may be unwilling to undertake the level of training required for a Driver CPC.

Even if Age UK transport services were completely unaffected, the broader re-designation of specific not-for-profit community transport as commercial services could still have wider **implications for**

The Government should **ensure these services are not forced to close because of uncertainty** during any interim period before the legal clarification





## **Extra costs of training**

Even what may seem like

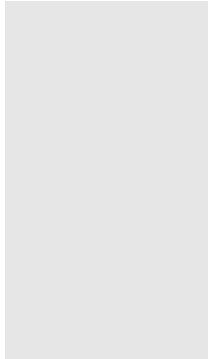
*would also result in our removing volunteering opportunities. This action would set in place barriers not just for us, but other charities who may find it insurmountable and only lead to compounding the real challenges that older people in our geographic area face daily.*



## **Services for vulnerable people**

Many Age UKs

**Appendix Age UK community transport services**





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Age UK Dacorum helped this lady by setting up some volunteers to take the lady and negotiating with community cars a minimal amount to cover expenses so the lady was able to reduce her financial outgoings and continue to visit her husband.

6. Age UK north east Lincolnshire	Minibus x2	Each have 17 seats	Section 19 permit	1 part time paid staff & 1 part time volunteer. Both have D licenses and one is MIDAS trained
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								guided on to the bus. Without Day care intervention Mrs E would have entered long term care.
<b>13. Age UK Bromley and Greenwich</b>	We provide 2 minibuses	13 seats on each minibus inclusive of the driver's seat.	Each vehicle has a permit 19 that expires October 2019	Paid employees drive each have D1 entitlement to licence, one is qualified to CPC level.	We do not directly charge for transport however we receive local authority funding for the day centre services. This covers the vehicle costs however we make no profit	4160 approx. will use the service.	If we had to have an additional expense of £1700 for professional licences for our drivers especially without receiving any additional funding for this – our provision of transport may be directly threatened due to being unable to cover an additional cost.	Across the board, all of our day centre attendees are physically disabled, frail and as such become very socially isolated. Some have no family members, without attendance at the centre, they would receive no social interaction whatsoever, it would also be very challenging to maintain their existing physical and cognitive wellbeing due to the lack of physical; and mental exercises and skill retention activities undertaken at the centres. This eventually would also impact not only the individual client involved but the statutory sector as alternative care packages would need to be put in place and may result in hospital or residential admissions.
<b>14. Age UK Northamptonshire</b>	13 minibuses	11 to 14	Section 19					

**15. Age UK  
Maidstone**

Six  
minibuses

Five have 14,  
one has 11

Section 19

Volunteers for  
standard day  
care with  
standard  
licenses. 2  
paid part time  
drivers for  
dementia  
service who  
hold standard  
licenses with  
mini-bus part  
included

Charge for day  
care that aims to  
cover the cost.  
No for the  
dementia  
service as it is  
included in the  
cost for the day.

150 places  
booked a  
week for day  
care resulting  
in round  
about 170  
people using  
the service  
annually. 100  
people over  
the year rely  
on the  
transport for  
the dementia  
centre



16. Age UK Cheshire	Both					Approximately 1806 people	If the changes going forward then include volunteers this would mean a significant impact on financial resources and it would likely result in us removing all services/projects that include our providing transport. Taking this action would also result in our removing volunteering opportunities.	
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## **Notes**

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<sup>ii</sup> HCT Group Impact Report 2017

<sup>iii</sup> Ibid

<sup>iv</sup> Ibid

<sup>v</sup> According to the Community Transport Association 73% of Community Transport providers said they provide journeys for health-related reasons. Community Transport Association 'State of the Sector' Report 2014 p12

<sup>vi</sup> Age UK Cornwall and Isles of Scilly, Internal Statistics, 2017 (unpublished)