



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

May 2018

Reference No: 1818

joe.oldman@ageuk.org.uk

Age UK  
Tavis House  
1-6 Tavistock Square  
London WC1H 9NA  
T 0800 169 80 80 F 020 3033 1000  
E [policy@ageuk.org.uk](mailto:policy@ageuk.org.uk)  
[www.ageuk.org.uk](http://www.ageuk.org.uk)

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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 participate. Age UK's subsidiary charity, Age International, supports 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 the Department for Transport (DfT) issued a consultation paper on revised guidance for the licensing of community transport services as a result of a legal challenge.

Previously under EU regulations community transport was considered exempt from the licensing requirements for commercial operators, which involves significant additional costs. Instead community transport providers were allowed to apply for permits under S19 or S22 of the Transport Act 1985. The type of licence depends on whether a not-for-profit transport service provides services for their members or specific groups linked to their charitable objectives (S19), or operates a community bus service or local bus route that can carry members of the general public (S22). Community minibus drivers are expected to have a D1 license<sup>1</sup> but have access to alternative training (Midas) to that required for commercial operators – which is much less costly.

The private operator who brought the legal challenge argued that where a private provider and a not-for-profit operator compete for a tendered service, the not-for-profits service is given a competitive advantage because of the lower cost of licensing.

As a result, the DfT issued draft guidance to seek a workable solution in response the legal challenge to ensure ongoing compliance with EU regulations. Although the proposed guidance initially appeared to make exemptions for a range of community transport providers we are concerned that in practice the requirements could incur additional costs for most community transport operators - resulting in reduced services or closure of services.

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 the Government's objectives 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 vulnerable older people who are dependent on other third sector transport services**

- The Government should **ensure these services are not forced to close because of uncertainty** during any interim period before the legal clarification of the current position.
- There needs to be **urgent clarification** on how the exemptions set out in the consultation will work in practice for a wide range of community transport services.
- The proposed guidance implies that community transport providers need to show they are not **blocking commercial operators** who may wish to deliver a local service on a particular route. This should be the strategic responsibility of the local authority. In many cases Age UKs and similar providers offer a transport service because of the failure of commercial operators to meet the needs of people in vulnerable circumstances.
- This consultation should be accompanied by **stronger obligations on local authorities** to help community transport services where a commercial service is withdrawn. If a commercial service is failing to provide an adequate service the not-for-profit sector should have the right to operate the route.
- There now needs to be further discussion with expert community transport groups, such as the Community Transport Association (CTA), to guarantee the revised guidance **does not inadvertently penalise all not-for-profit** transport services – especially where they are clearly not competing with larger commercial providers.
- **We generally support the position of the Community Transport Association.** Our response is intended to provide a supplementary view and our evidence refers to the difficulties that local Age UKs delivering community transport services could experience.

## 2. Introduction

Every year, over 23 million community transport journeys<sup>ii</sup> take place. The majority (98%<sup>iii</sup>) of community transport users are over 65 years old and 68% of users are disabled.<sup>iv</sup> Many older people in the UK rely on community transport services on a daily basis to access healthcare<sup>v</sup>, day centres, lunch clubs and care services. These services help them to remain engaged with their local community and have a major role in preventing loneliness and in promoting health and wellbeing.

The ongoing withdrawal of commercial bus services means the community transport sector has gained growing importance in filling in transport gaps, particularly in rural areas. Many voluntary transport services are financially fragile and rely on donations and the good will of volunteers to continue.

Any decline in community transport would have both an immediate and longer-term impact on the health and wellbeing of many thousands of older people. If older people

were no longer able to get to preventative support services or activities provided by the voluntary sector, it would put increased strain on social care and the NHS.

While appropriate licencing and training are essential to protect the safety of older people using transport services, we think the current proposals go far beyond what is proportionate or necessary, particularly given the good safety record of community transport schemes.

### **3. Consultation response**

#### **3.1 Licencing requirements for paid drivers – Driver CPC**

There seems to be continuing uncertainty over whether the Department for Transport (DfT) proposed guidance will require all community transport providers with a paid driver to have a full D1 licence alongside additional requirements for a Driver Certificate of Professional Competence (Driver CPC). This could have a dramatic impact on many voluntary organisations such as Age UK, where transport is not the main charitable objective.

We do understand the complexity of this issue in terms of differing requirements for licenses depending on the driver's age, experience and level of training. We also understand that there are already specific exemptions if a volunteer driver receives no payment other than out of pocket expenses. However, we are seeking urgent reassurance that the Government will provide formal guidance or introduce legislative reform to ensure the existing range of Age UK transport services (and similar voluntary transport services) will not incur any additional cost as a result of revised guidance beyond the existing legal requirements.

The CTA maintains that it is 'likely' the draft guidance will mean that local Age UKs and similar charities will incur additional costs related to licensing. They have told us that some charities with paid drivers may have to pay £1,700 for each driver. Although we accept that this issue is still unclear and needs further clarification, we asked local Age UKs to tell us the implications of this scenario, if it applied to their transport services. At this point, regardless of the current technical and legal details, the feedback we have received demonstrates how fragile this sector is to any additional costs that could undermine or close services.

#### **3.2 Redefining community transport services**

Like the CTA we believe that all not-for-profit transport services should be exempt from the requirements placed on commercial operators. Any income received by not-for-profit services is ploughed back into accessible transport for often vulnerable or low income groups - which clearly differentiates them from commercial operators. Also the favourable treatment of not-for-profit services has allowed them to fill gaps where commercial services have been withdrawn. Given the high numbers of older people using dedicated community transport services we are concerned about the broader impact these changes may have on their ability to get to services.

While we understand the Government's position is designed to address the legal challenge made by a private operator and to ensure compliance with EU regulations, we question the need for urgency and hope that the DfT will work with the CTA to resolve the issues raised.

### **3.3. Commercial operators potentially blocking community transport**

We have concerns that the proposed guidance could allow some private operators to block contracts on the basis of protecting their speculative interests without the intention of ever delivering a service. Whether or not a particular route should be considered commercial in relation to the regulations should be determined by local authorities. We would also like to see a stronger obligation on local authorities to work with the community transport sector, where the private operator withdraws a commercial service.

## **4. Impact of additional costs on Age UK services**

We carried out a survey of transport services provided by 16 local Age UKs (and had expressions of concern from 13 others) - to help us determine the possible impact of the DfT proposed guidance. We found the majority of the Age UKs in our survey provide community transport with a S19 permit and most drivers have a D1 licence.

In response to our survey local Age UKs told us they are getting very mixed messages over the interpretation of the proposed guidance, which is causing a great deal of alarm. They want urgent clarification from the DfT to remove any uncertainty about the future of their transport services.

Most told us that any additional licencing and training requirements linked to the D1 licence or Driver CPC might close or drastically reduce their transport services - even where they might be operating a single minibus. More specifically many Age UKs have told us their drivers are part-time and often difficult to recruit. This means that even with a small additional cost for drivers who already have a D1 licence, they may be unwilling to undertake the level of training required for a Driver CPC.

### **Undermining access to Age UK services**

The loss of local community transport could undermine access to Age UK services. It could damage ongoing contractual obligations to ensure older people are safely transported to these services. It could also have implications for local authorities under their Public Service Equality Duty, where disabled older people rely on community transport to access key services.

*'It would make the transport element of [our day care]service not viable and we would have to cease providing it as there is not enough money in the day care contract to pay this cost; and given the social-economic profile of the borough no scope to increase individual charges further. If transport is not available it would seriously affect access to the day care provision for frail and vulnerable older people as most need adapted vehicles and cannot use cars or regular transport.'* **Age UK Blackburn with Darwen**

## Extra costs of training

Even what may seem like a relatively small cost is likely to impact on some Age UKs – who are already struggling to maintain their funding for services.

*'If we had to have an additional expense ... 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.'* **Age UK Bromley and Greenwich**

*'We transport approximately 2,500 older people in our buses yearly for varying reasons including lunch clubs, day trips, and activities. We would not be able to afford to provide that expensive training to both drivers on a yearly basis, it would certainly make the service unviable.'* **Age UK North East Lincolnshire**

For larger services the additional cost could be huge.

*'All 33 drivers would be required to take a D1 and then the 35hrs CPC training, this would cost £70k alone for the training plus any cover drivers that would be required to assist while the main driver was training.'* **Age UK Leicestershire and Rutland**

## Reliance on other community transport providers

**Age UK Lancashire** told us that although they do not have their own transport service they rely on both community transport and commercial operators. However, changes meaning more reliance on commercial services would become unaffordable.

*'We work with not for profit transport providers such as 'community transport' and commercial businesses which are significantly more expensive. Where we have a not for profit arrangement in place, we are generally in a position where we can sustain the costs by charging an affordable rate to our service users and generating an income to support the cost. The obvious benefits are shared across the sector and enable those who cannot access public transport to make use of the services they need. We are pro-active in supporting local community car schemes to recruit volunteers in the areas where they have high demand for the service, we are mindful of the added benefit of a thriving scheme near to our centres. Where we have a 'commercial' arrangement in place, the higher cost impacts on the long term sustainability of the arrangement.'*

## Implications for volunteer drivers

The guidance and existing practice suggests that volunteer drivers receiving out of pocket expenses would be exempt from any changes in the interpretation of the regulations. However, we would still like some clarification over whether the guidance will have any effect on volunteer drivers in terms of additional training requirements. This is an important point because any additional costs or training requirements could deter potential volunteer drivers. Given this we asked Age UKs what the implications of any extra costs for volunteers would be.

*'... 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. 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.'* **Age UK Cheshire**

If volunteers were required to obtain a Driver CPC training, it seems likely that many of them would be unwilling to undertake professional training, and many organisations would be unable to afford the additional costs. Clearly, this would have a direct impact on older people who rely on community transport.

Many transport services rely on the support of volunteer drivers to allow them to operate. Requiring volunteers to undertake further training might discourage them from giving up their time, particularly as there is a high turnover of voluntary staff.

### **Impact on older people**

Many Age UKs provide a range of vital transport services for thousands of older people. For example the TAP Community Transport service which is run by **Age UK Cornwall and Isles of Scilly** told us:

*'Our internal statistics show, between April 2016 and March 2017, the service completed over 103,000 journeys and this resulted in the service being the primary supporter of 49,000 people across Cornwall and the Isles of Scilly who have trouble attending medical appointments, social outings, leisure activities and educational facilities<sup>vi</sup>.*

We asked local Age UKs what effect they thought the withdrawal or reduction of transport services would have by preventing older people getting to local support services.

*'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.'* **Age UK Bromley and Greenwich**

*'We provide a mini bus offering transport to around 60 older people with dementia every week. Our day care is no longer commissioned by council so we charge. We would need a minimum of seven of our staff to be covered to drive to ensure no breaks in our service. We would have to pass charges to our service users which would make our day support less competitive and possibly no longer viable. Ours is the only specialist dementia care in Trafford.'* **Age UK Trafford**

## Services for vulnerable people

Many Age UKs provide services for particularly vulnerable people who would be badly affected.

*'Mrs E is in her early Nineties and has been diagnosis with dementia and a slight hearing impairment. Mrs E has a long history of depression and anxiety, she is unable to cope emotionally with being on her own for long periods of time. When alone Mrs E becomes confused and disorientated to time and place. She enjoys constant company and socialising with other individuals. The transport service is vital in enabling Mrs E to access Day Opportunities. Mrs E required support from the passenger escort to access the vehicle. Mrs E is collected from the property by the escort and guided on to the bus. Without Day care intervention Mrs E would have entered long term care'.* **Age UK South Staffordshire**

Many older people are unable to use general transport services and need access to adapted vehicles.

*'If transport was not available it would seriously affect access to the day care provision for the most frail and vulnerable older people as most need adapted vehicles and cannot use cars/normal transport'.* **Age UK Blackburn with Darwen**

In an effort to meet the Department's call to provide as much evidence on community transport services as possible, we have compiled all the feedback we have received from local Age UKs in the appendix.

## Appendix – Age UK community transport services

Age UK	The type of community transport you provide e.g. minibuses or volunteer driver scheme	If you have a minibus/minibuses, how many seats do they have each	If you have a minibus, do you have a section 19 or 22 permit?	If you have a minibus, who drives it? Are they paid or volunteers? What type of driving licenses do they have?	Do you charge for your community transport service? If so, does this simply cover the cost of the transport or does it make your Age UK a small profit?	Roughly how many older people use your service a year?	What impact would it have on your service if your drivers had to have professional driving licenses (roughly £1700 per person)?	Could you provide a case study of someone who relies on your minibus or volunteer driver service and what might happen to them if they were unable to access this service?
<b>1. Age UK Leicestershire and Rutland</b>	26x Minibuses and volunteer car schemes	We have 25 minibuses all 17 seaters including driver unless seats are removed for wheelchair riders	Section 19 permit for all minibuses	Paid staff only, D1 (101) category	Yes, we charge to cover expenses only. We sit under the 10% threshold	We make 25000 return journeys a year	All 33 drivers would require to take a D1 and then the 35hrs CPC training, this would cost 70k alone for the training plus any cover drivers that would be required to assist while the main driver was training	Eileen is 71 and attends a day care service twice a week. She has limited mobility and uses our accessible minibus for both journeys. Without the minibuses she would be unable to attend day care, as the closest bus stop is too far for her to walk and taxis are too expensive.  Eileen stated “I would be isolated and depressed without the minibus to collect me for Day Care and I wouldn’t have any other way of attending.

<p><b>2. Age UK Tunbridge Wells</b></p>	<p>Minibus</p>	<p>12 seater minibus.</p>	<p>Section 19 Permit</p>	<p>Full time paid driver. Another member of staff covers sick/annual leave.</p>	<p>Clients make a charitable donation towards the minibus, but this does not cover the cost of their transport.</p>	<p>Approx. 175 individual clients, meaning 3016 return journeys</p>	<p>A very big financial impact (£3,400) to change the licences for the full time driver and relief driver.</p>	<p>Mrs S. lives with dementia and physical impairments, and attends the dementia day centre three times a week. She is unable to walk due to her pain. We collect her in the minibus; we transport her to and from the bus in her wheelchair. If this client were unable to use this service, she would be alone and isolated. Attending the day centre gives her the opportunity to have a home cooked two-course lunch, meeting other people and to take part in activities.</p>
<p><b>3. Age UK Dacorum</b></p>	<p>Currently we offer a volunteer driving service. From 1<sup>st</sup> May we will have a minibus</p>	<p>The bus will have ten seats</p>	<p>We will be applying for a section 22 permit</p>	<p>The bus is driven by both paid staff and volunteers</p>	<p>We hire in mini buses. Our own drivers drive the buses. We charge £4.00 to the client for using the mini bus.</p>	<p>Approximately 260 people per week. 12,480 per 48 week year</p>	<p>Devastation. It would be very difficult to continue to provide these services. We have four regular paid drivers and one back up. Thus for paid staff the cost would increase by £8,500. In regards to volunteer drivers we would have to close the services. Many other volunteer services would also close, e.g., Good Neighbours</p>	<p><b>Watford General Hospital</b></p> <p>A woman's husband was in Watford General Hospital. She visited him every day, but the hospital is 10-12 miles away and a very difficult journey for her. To use public transport would require three buses (excluding having to walk to the initial bus stop) and take up to two hours. Therefore the lady decided to use taxis, costing £15.00 each way. After some time she did negotiate a special rate of £12.00. Unfortunately, her husband was in hospital for some time and she had used up the last of her savings.</p>

								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. .
<b>4. Age UK Sandwich</b>	Minibus for centre use only	17 seats with two removed	Section 19 permit	2 paid drivers with ordinary licenses	Yes but it does not cover the cost of the transport	2000, approx. 40 a week	We would not be able to afford to pay for two licenses and would either have to stop the service or charge more money	We pick up one client in a very remote area, which is not served by public transport. She would be very lonely and isolated if we did not pick her up plus while she is at the centre she receives a hot home cooked lunch which she would be unable to make for herself at home
<b>5. Age UK Blackburn with Darwen</b>	Minibus transport to bring service users from their homes to the day centre and returning home after	3 x 16 seaters	Section 19	Currently 4 paid and 2 volunteers.	There is a charge of £3 per day for transport to and from the day care centre. We do not make a profit. The charge is fixed by the local authority and is standard across all the day care provision commissioned	Avg. 30 people per day, 5 days a week, 48 weeks a year (7,200)	We would have to cease providing transport, as there is not enough money in the day care contract to pay this cost; and given the socio-economic profile of the borough no scope to increase individual charges further.	If transport was not available it would seriously affect access to the day care provision for the most frail and vulnerable older people as most need adapted vehicles and cannot use cars/normal transport

<b>6. Age UK north east Lincolnshire</b>	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	Yes we do, costs vary on trip and activity. It usually runs at a slight loss but bringing people into activities/lunches	We transport approx. 2500 older people in our buses yearly	We would not be able to afford to provide that expensive training to both drivers on a yearly basis, it would certainly make the service unviable.	No
<b>7. Age UK Stafford</b>	Minibuses	8	Yes	Paid staff with a category D license	Yes, but income only covers about half of the costs	8500	We would probably not be able to provide the service.	No
<b>8. Age UK Lindsey</b>	Minibuses	Between 8 and 16 (plus a people carrier for 4) – passenger numbers not including driver	Section 19	Mostly volunteers but with 3 very part time paid drivers – D1 (101 restriction)	Yes – it currently makes a loss! But aiming to cover costs			No
<b>9. Age UK West Sussex</b>	Minibuses x 2	16 seats each	Section 19	Volunteers. All have D1 class on their licence. All of our drivers take a minibus/wheel chair course of competency and are first aid trained	Yes. We are hoping to just cover the costs, although at present we are falling short	Wait for this info	It would not be viable	Nearly half of our members would not be able to attend the clubs without our transport. e.g. Mr. A. is now a regular member of 2 – 3 of our clubs and uses our minibus to get him there as there is no public transport available. He has made new friends and is not lonely.

<b>10. Age UK Trafford</b>	One minibus and two smaller vehicles, but in the process of getting a second minibus.	12 seats in present minibus are consider a second smaller 9 seater	Section 19 permit	Paid staff. Ordinary licenses but that include minibuses of the size we use	Yes, no more than covers cost of the provision.	Approx. 60 people a week with dementia to and from our day care	We would have to pass charge to our service users which would make our day support less competitive and possibly no longer viable. Ours is the only specialist dementia care in Trafford	No
<b>11. Age UK Barnsley</b>	Volunteer driver	N/A	N/A	N/A	Volunteer costs only	200 journeys	It would end	<a href="https://www.youtube.com/watch?v=PB9LxK0JSTk">https://www.youtube.com/watch?v=PB9LxK0JSTk</a>
<b>12. Age UK South Staffordshire</b>	We operate 9 minibuses	17 seats per minibus, which includes the driver's seat.	Section 19 permits	Paid drivers hold a D1 licence. Additional requirements are a medical, driving theory and practical test	We do charge a minimal fee of £6.00. This fee does not cover costs	Around 200 people use our service	As we do not make a profit through our transport service, it would not be financially viable to continue providing a transport service	<p>Mrs E is in her early Nineties and has been diagnosis with dementia and a slight hearing impairment.</p> <p>Mrs E has a long history of depression and anxiety, she is unable to cope emotionally with being on her own for long periods of time. When alone Mrs E becomes confused and disorientated to time and place. She enjoys constant company and socialising with other individuals.</p> <p>The transport service is vital in enabling Mr E to access Day Opportunities. Mrs E required support from the passenger escort to access the vehicle. Mrs E is collected from the property by the escort and</p>

								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	Paid, with D1 and MIDAS training	Enough to cover costs	Approx 32760	Our drivers are all retirees and would not retrain therefore our whole county Day Care services would collapse	Blind, Hard of hearing and mobility challenged pensioner is brought by our bus to Day Care. Her wellbeing hygiene is checked plus receives good meal and socialises. If this were to stop she would be confined to her house only socialising with visiting carers. Poor food etc.

<p><b>15. Age UK Maidstone</b></p>	<p>Six minibuses</p>	<p>Five have 14, one has 11</p>	<p>Section 19</p>	<p>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</p>	<p>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.</p>	<p>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</p>	<p>We would have to pass on the cost to our clients. If all volunteer drivers were to take the test it would cost us an additional £32,300 on a service that already costs £65,000 a year to run, a 50% increase in our costs. If any of our volunteers decided not to take the test we would have to reconsider the number of centres we currently operate or look to employ paid drivers at an additional extra cost. Again for the dementia centre we would have to pass on the cost yet again increasing the price per day when we have already had to take into account the National Living Wage.</p>	<p>If needed</p>
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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)