

Concessionary Travel

Method Statement

Eligibility: Disabled Person's Bus Pass



Eligibility criteria

The England National Concessionary Travel Scheme (ENCTS) is a national scheme which is administered in Warwickshire by the WCC. The eligibility criteria have remained unchanged since at least 2011 when WCC took over the scheme from the District and Borough Councils.

As the eligibility criteria are set down in legislation, WCC has no power to alter them, and is unable to issue ENCTS passes to anyone who does not meet the criteria.

An applicant for a pass must live in Warwickshire – this means their sole or principal residence must be within the county.

In addition, applicants for a Disabled Person's Bus Pass must show that they have one or more of the seven qualifying disabilities, as set out in the Transport Act 2000 and accompanying government guidance.

This document outlines how eligibility criteria will be applied in Warwickshire.

Category D

Section 146 of the Transport Act 2000 includes a person who is "**has a disability, or has suffered an injury, which has a substantial and long-term adverse effect on his ability to walk**" as a disabled person who would qualify for a bus pass.

The current (April 2025) Department for Transport Guidance on eligibility says;

(d) has a disability, or has suffered an injury, which has a substantial and long-term adverse effect on his ability to walk

To qualify under this category, a person would have to have a long term and substantial disability that means they cannot walk or which makes walking very difficult.

It is envisaged that passes will be issued to people who can only walk with excessive labour and at an extremely slow pace or with excessive pain. Their degree of impairment should be at comparable level to that described in the 'Guidance on assessing ability to walk' below.

Where an applicant has been awarded PIP, with an award of 8 points or more for the 'Moving around' activity, or the higher rate mobility component of Disability Living Allowance (HRMCDLA), a relevant benefit award letter may be accepted as [evidence of automatic entitlement to an ENCTS pass](#).

Where the specified rates of PIP or DLA have not been awarded, or where these benefits have not been applied for, applicants may still be found eligible if assessed using the following criteria.

Guidance on assessing ability to walk

“(i) they cannot walk or...”

Being unable to walk means that they cannot take a single step.

They need to show that because of their disability they cannot put one foot in front of the other.

Walking involves always having one foot on the ground.

If their only way of getting about is to swing through crutches then they will be considered unable to walk.

“(ii) they are virtually unable to walk, or...”

They will need to show that they are unable to walk very far without experiencing severe discomfort.

Discomfort can mean either pain or breathlessness. Extreme fatigue and stress may also be taken into account. It has been accepted that discomfort is subjective and that some people have higher pain thresholds than others.

Unless both legs are missing then they will need to show that they experience severe discomfort even when using an artificial aid.

When deciding whether they are virtually unable to walk the following factors should be taken into account:

- the distance over which they can walk without experiencing severe discomfort
- the speed at which they can walk
- the length of time for which they can walk
- the manner in which they can walk

If they can only walk up to 27 metres without severe discomfort then they will qualify for the mandatory concession.

If they can only walk between 27 and 64 metres without severe discomfort then it is likely that they will qualify for the mandatory concession.

If they can walk more than 64 metres without severe discomfort then they will need to show that the other three factors mean that they are virtually unable to walk. For example, if they can show that it takes them five minutes to walk 100 metres, they should qualify for the mandatory concession.

As a guide, the average person can walk the following in a minute:

- 90 metres at a brisk pace
- 60 to 70 metres at a moderate speed
- 40 to 50 metres at a slow pace
- 30 to 40 at a very slow pace

It does not matter whether the severe discomfort occurs at the time of their walk or later. What counts is that the discomfort is a direct result of their attempt to walk.

“(iii) The exertion required to walk would constitute a danger to their life or would be likely to lead to a serious deterioration in their health.”

The test here is whether the exertion required to walk would constitute a danger to their life or whether it would be likely to lead to a serious deterioration in their health.

They need to show that they should not walk very far because of the danger to their health.

This criterion is intended for people with serious chest, lung or heart conditions.

Some people with haemophilia may also qualify for the mandatory concession in this way.

The serious deterioration does not need to be permanent but it should require medical intervention for them to recover.

They will need to show that any danger to their health is a direct result of the physical effort required to walk.

People with epilepsy will need to show that any fits were brought about by the effort required to walk.

In all cases, entitlement depends on the applicant's difficulty in walking and considerations, such as difficulty in carrying parcels, are not to be taken into account.

The fact that a walking aid is or is not used may be relevant to the eventual decision, but these alone should not determine whether or not a person qualifies. For example, if a person can walk relatively normally using an artificial leg, without experiencing severe discomfort during or as a result of walking, then they should not be considered eligible. Alternatively, a person who can only swing through on crutches could be considered eligible, as they would be seen as having considerable difficulty walking (provided it is due to a long-term disability and not due to legs being in plaster).

The department advises that the TCA should normally require medical evidence to support the claim that the applicant's walking ability is long term and substantially impaired.

It also says

Passporting from state benefits

The department recommends that eligibility for an ENCTS pass may be considered 'automatic' (not requiring further assessment) where a person is in receipt of any of the following state benefits, provided that the person is of fare paying age and that the award of the benefit has been for at least 12 months or is expected to be for at least 12 months:

- Personal Independence Payment (PIP) – where the applicant has been awarded at least eight points against either the PIP "Moving around" and/or "Communicating verbally" activities
- Higher Rate Mobility Component of Disability Living Allowance (HRMCDLA)
- War Pensioner's Mobility Supplement (WPMS)

We view these 3 state benefits as a robust way of assessing eligibility because the criteria that someone must meet to receive them is closely aligned to the criteria that a person must meet to be eligible for an ENCTS pass. Therefore in these cases the TCA does not need to carry out a further assessment of an applicant's eligibility.

However, a decision to consider an applicant automatically eligible for an ENCTS pass comes at the discretion of the relevant TCA, based on their own consideration of the evidence provided and any legal advice they seek. There is no requirement in the 2000 Act or the 1999 Act that eligibility should be automatic.

Applicants claiming these benefits will be able to provide documentary evidence of their entitlement. An example of proof of entitlement is proof of payment of the allowance. An applicant receiving the HRMCDLA or PIP will be able to produce an award notice letter from the Department for Work and Pensions (DWP). If they have lost the award notice, [DWP can provide another copy](#).

A PIP claimant will already have been assessed as having a disability which will, or is likely to, last for at least twelve months. Further detail on passporting eligibility from PIP, including details of the descriptors indicating an award of 8 points or more, is provided below.

An applicant receiving WPMS will have an award letter from the Service Personnel and Veterans Agency.

In our view, only the specific benefit awards listed above have eligibility criteria which is sufficiently consistent with that of the mandatory concession to justify granting applicants access to it without further assessment. Nevertheless, proof of receipt of any state benefit, even where it is unsuitable for demonstrating automatic entitlement, may still be relevant to applications alongside other evidence such as independent medical advice. In either case, it is for TCAs to determine what action is appropriate.

In previous guidance, eligibility has been considered automatic where a disabled person of fare-paying age has been issued with a disabled persons' parking badge (Blue Badge). We would no longer recommend automatically passporting Blue Badge eligibility to the ENCTS due to differences in the eligibility criteria.

Guidance was published in 2011, relating to the automatic eligibility for some service personnel and veterans. This is no longer available on the government website, but a copy is available on the WCC website [Guidance on assessing the eligibility of Service Personnel and Veterans for the England National Concessionary Travel Scheme](#)

Category D - Issuing a pass

WCC will therefore issue passes to individuals who can demonstrate **one** of the following criteria applies.

- They are unable to walk at all
- They can only walk by swinging through crutches
- They can walk less than 64m without experiencing severe pain
- They can walk less than 64m without experiencing severe breathlessness,
- They can walk less than 64m without experiencing severe fatigue
- The exertion required to walk would constitute a danger to their life
- The exertion required to walk is likely to lead to a serious deterioration in their health

A pass will only be issued where the disability will last longer than 12 months

Category D - Evidence which can be used

Evidence which can be provided to help show eligibility under category D includes.

| Evidence | Detail | Notes |
|--------------------|--|---|
| PIP award* | showing 8 or more points for the 'Moving around' activity. | This will be accepted for up to five years, or sooner if the expiry date is sooner. The points pages, dated within the last 12 months, need to be provided |
| PIP* | Extension letter for existing award | If there is a DWP delay, please contact us as we may be able to accept an extension letter to extend your pass. |
| Current DLA Award* | showing receipt of Mobility Component at the Higher Rate | This will automatically be accepted for a period of 12 months for adults, and for up to five years for children. |

*For PIP and DLA, we will ask for a copy of the paperwork which is dated within the last 12 months. This is because of instances where a long-term benefit has been awarded to a bus pass applicant but subsequently withdrawn. Copies can be requested from DWP online at <https://www.gov.uk/proof-benefits-state-pension> or by calling 0800 121 4433

| Evidence | Detail |
|-----------------|--|
| CT-D1 form | Completed and signed by a medical professional, demonstrating that the one of the above criteria applies |
| Medical records | Provided these contain enough information to assess whether one of the criteria above applies |

For veterans, the following is also automatically accepted

| Evidence |
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| SPVA Notice of Walking Disability |
| SPVA Confirmation of War Pensioner's Mobility Supplement award |

Armed Forces Compensation Scheme (AFCS) award with one of the following injuries

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| AFCS Table 5 - Amputations: | Item 1: Loss of both legs (above or below knee) and both arms (above or below elbow) |
| | Item 2: Loss of both eyes or sight in both eyes and loss of either both legs above or below knee), or both arms (above or below elbow) |
| | Item 3: Total deafness and loss of either both legs (above or below knee) or both arms (above or below elbow) |
| | Item 6: Loss of one arm, above or below elbow, and one leg, above or below knee, with total loss of use of another limb due to traumatic injury involving vital structures. |
| | Item 9: Loss of both legs where one loss is at hip disarticulation or hindquarter loss, and the loss of the other leg is at any level. |
| | Item 10: Loss of both legs above or below knee (not hip disarticulation or hemipelvectomy) and one arm (above or below elbow) |
| | Item 12: Loss of both legs where one loss is at or above knee (trans-femoral or knee disarticulation) and the loss of the other is at any level. |
| | Item 13: Loss of one leg above knee (hip disarticulation or hemipelvectomy) |
| | Item 15: Loss of both legs below knee (trans-tibial) |
| | Item 18: Loss of one leg at or above knee (trans-femoral or knee disarticulation) |
| | Item 19: Loss of both feet at ankle distal to the calcaneum |
| AFCS Table 6 – Neurological disorders, including spinal cord, head or brain injuries | Item 4: Brain injury with persistent vegetative state |
| | Item 5: Brain injury resulting in major loss or limitation of responsiveness to the environment, including absence or severe impairment of language function, and a requirement for regular professional nursing care |
| | Item 6: Cervical spinal cord injury with some useful upper limb function and complete or near complete paraparesis |
| | Item 7: Thoracic spinal cord injury with complete paraparesis |
| | Item 8: Injury to conus medullaris or cauda equina giving rise to complete paraparesis |
| | Item 12: Injury to conus medullaris or cauda equina giving rise to partial paraparesis or severe monoparesis |

Category D - Evidence which is **NOT** acceptable

| Document | Reason for rejection |
|--|---|
| WCC evidence forms which have been completed by an applicant, family member, or direct carer | The person completing the form needs to be a medical professional involved in the applicant's care. |
| WCC evidence forms which are ticked or initialled, or where the signatures do not match. | We need to be sure that the person completing the information about the disability is the same person who signs the form. If the boxes relating to the disability are initialled or ticked then this indicates that the medical professional completing the form has not read it properly. |
| PIP paperwork without reference numbers, or with mismatched pages | The reference numbers at the bottom of the pages must be visible and all pages must match |
| PIP Information which is more than 12 months old, or is undated | We will need to see a current 'Statement of Entitlement is your points |
| PIP Certificate of Entitlement | This does not tell us how many points you have been awarded. |
| PIP Yearly Update | This does not tell us how many points you have been awarded. |
| PIP award – no points information | This does not tell us how many points you have been awarded. |
| PIP award : 4 points for moving around | This is not an automatic qualification for a pass. You may want to ask a medical professional to complete a CT-D1 if you still believe you qualify |
| PIP award : points for Planning and following a journey | This does not tell us about your ability to walk. |
| List of medical conditions | In most cases this will not tell us about your walking ability in enough detail. |
| Information which says you have difficulty walking | This does not contain enough information |
| Evidence that you walk with a stick or walking frame | This does not contain enough information |
| Letter in support of your application, without detail about your walking ability | We cannot issue a pass because someone would benefit from having one. |
| Blue Badge (disabled parking badge) | The eligibility criteria for a Blue Badge is different to the criteria for a bus pass. |
| Paperwork in a different name | Unless evidence of name change is also provided. |
| Evidence which indicated a short-term disability | Passes will only be issued where a disability will last more than 12 months. |