

F1457 A2 Customer Equality Impact Assessment (EQIA) Form

The Equality Impact Assessment (EqIA) is a means by which we can demonstrate how we have considered inclusion and put people at the heart of the decisions and changes we make. It is a tool to explore the potential for a service, project, programme, or business plan to have an impact on a particular protected characteristic, inclusion groups, or community. This includes the impact on one or more of these groups:

- Protected characteristic groups (as outlined in the Equality Act 2010)
- Disadvantaged or marginalised groups or communities
- Deprivation and socio-economic disadvantage within local communities

Please note:

To comply with our agreed policy on completing Equality Impact Assessment (EqIA) and meet our requirements under legislation, all new strategies, policies, business plans, change programmes or projects must be impact assessed before being introduced. Within this document, you will need to provide evidence to demonstrate:

- Consideration of the impact of your initiative for each protected characteristic and other disadvantaged groups and communities
- Assessment of the impact you have identified and a clear action plan to mitigate the issues and concerns which arise from this.

The steps for completing EqIA are:

- Introduction of aims/objectives/focus
- Gather evidence in relation to all relevant protected characteristics and inclusion groups
- Engagement and consultations – consult and engage with relevant stakeholders/inclusion groups/communities and seek feedback
- Assess or identify potential impacts
- Act on the results including planning actions to mitigate potential negative impact
- Monitoring and evaluation
- Make the right decision based on the evidence and findings from the assessment
- Sign-off

to be used in conjunction with: [G1060](#)

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Draft or completed customer EqIA should be submitted to Customer EQIA [inbox](#) and a superuser or member of the customer D&I team will be allocated to review the document. Please ensure you have read the customer EqIA guidance before using this form.

1. Key information and clarifying aims

Title of strategy, service, business plan, programme, or project	Withdrawing Day Travelcards			Unique ID No. <i>(To be assigned by the D&I team)</i>	D&IC/23/485
Team/Department/Directorate	Tech & Data – Payments				
EQIA author	Billy McConnachie				
Senior accountable person	Dale Campbell				
Date EQIA started	23 February 2023		Date EQIA completed		
Project Stage					
What is the focus of this EQIA? <i>(Please tick which is appropriate)</i>	Service	Project	Programme	Strategy or business plan	Others <i>(please state below)</i>
				X	
Who would benefit or be impacted by your strategy, service, business plan, programme, or project <i>(Please provide details of below)</i>					
Customer	<p>Customers would be impacted by the proposal to withdraw Day Travelcards. The proposed withdrawal would mean TfL would no longer sell or accept any Day Travelcards, including those sold by Train Operating Companies (TOCs) who are party to the Travelcard Agreement (“relevant TOCs”) and their third-party retailers (but TfL would continue to sell and accept weekly and longer period Travelcard seasons). It is anticipated that, if TfL ceases to accept Day Travelcards, relevant TOCs will also stop selling Day Travelcards; however, they determine their own products and services and have not confirmed their intentions. None of this would affect pay as you go (PAYG) caps on Oyster or contactless, which will continue to apply as they do now to all TfL services and relevant TOC services within London.</p> <p>Should the proposed withdrawal of Day Travelcards be approved, it would have the following consequences and general impacts for customers.</p>				



Standard¹ Day Travelcard

Customers who use this ticket would need to switch to PAYG with contactless or Oyster card to pay for travel to benefit from PAYG daily caps.

Those customers travelling within London only ('in-boundary') who have access to contactless or Oyster (or Zip Oyster, for children) would pay less for their travel within London (on TfL and relevant TOC services in London) because PAYG daily caps on contactless and Oyster for travel within zones 1-9 are cheaper than using a Standard Day Travelcard. (The same applies to Zip Oyster (which would be significantly cheaper) and Oyster cards with a Young Visitor discount applied compared with child Standard Day Travelcards).

Customers travelling into London from a National Rail (relevant TOC) station outside London ("out-boundary") using a National Rail return ticket with a zones 1-6 Day Travelcard "add-on" would need to buy National Rail point-to-point or London terminals tickets, and switch to PAYG on arrival in London, to travel on TfL services. This could make travel into London more expensive and in some cases significantly more expensive, as the cost associated with a Travelcard add-on is smaller than the cost of an actual Travelcard and PAYG caps. Illustrations of this are given in the attached appendices.

Customers who do not have access to contactless and do not already have an Oyster card would need to pay £7 for a new one to benefit from PAYG daily caps.

Customers without access to a smart device, contactless payment card or Oyster card would need to use paper single/return tickets, which are generally more expensive than PAYG caps and cannot be used on the TfL bus network.

Customers would need to make sure they are touching in and out to pay the right fare and to benefit from a daily price cap.

When using PAYG with Oyster customers would need to ensure they have enough PAYG credit to travel and that they always touch in and out correctly.

Customers would no longer be able to get a discounted ticket on River services when showing a Day Travelcard.

Children

Without a Day Travelcard customers would need to apply for a Zip Oyster photocard at least a month in advance. They would also need to pay a one-off admin fee of £15. Children without a Zip Oyster photocard would be able to have a Young Visitor discount (YVD) set on a Standard Oyster card, which would give half-adult fares and daily price caps. The YVD needs to be set by a member of staff at station ticket machines or at Visitor Centres. An adult (accompanied by the child the YVD is for) can go to any Tube or Overground station, or Visitor Centre, to have it applied. The

¹ Within this document a "Standard Day Travelcard" is a Day Travelcard that is not a Group Day Travelcard, Family Day Travelcard, Weekend Day Travelcard, , or a Discounted Day Travelcard with a National Rail card

To be used in conjunction with: [G1060](#)



	<p>only condition is that the child must be present when the adult is requesting YVD to be set on the card. Apart from the cost (£7) of a new Oyster card, there would be no additional costs associated, other than the money needed to add to the card for travel (10 pence at Oyster Ticket Stops). Customers can also buy a Visitor Oyster card in advance and have the Young Visitor discount set on the card on arrival in London. Visitor Oyster cards cost £5. The minimum top-up is £10 and there is an additional cost of post & packaging, which varies depending on which country the card is being sent to but starts at £3 for UK p&p.</p> <p>Other Day Travelcards</p> <p>In addition to the Standard Day Travelcard, there are four other different types of Day Travelcard that would no longer be accepted by TfL for use on its network if this proposal is approved. They are the Group Day Travelcard, the Family Day Travelcard, the Discounted Day Travelcard (1/3rd discount with various National Rail railcards), and the Weekend Travelcard. They are only available as paper tickets.</p> <p>For the consequences and general impacts of withdrawing these other Day Travelcards see below and Appendices 2 and 3. However, in each case customers using these tickets would need to switch to PAYG with contactless or Oyster card to pay for travel to benefit from PAYG daily caps, and travel may become cheaper or more expensive and, in some cases, significantly more expensive.</p>
<p>Employee <i>(for workforce or employee only impact assessment, please email the D&I workforce team at EQIA@tfl.gov.uk)</i></p>	<p>There may need to be additional interaction between staff and customers as staff give advice and guidance to customers about alternative ways to pay for travel, particularly with those who are less experienced with travel in and around London, such as tourists and other visitors. This could have an impact on how the availability of staff at stations is managed, especially at gateway stations.</p> <p>There may be more interaction between customers and Contact Centre staff if customers contact TfL for advice and guidance about alternative ways to pay. Staff may also have to deal with more queries relating to PAYG, such as issues with touching in and out and journey history requests.</p>



Provide background information and outline the aims/objectives/scope of the strategy, service, business plan, programme, or project

Introduction

Due to TfL's reliance on passenger fares for the majority of its operating income, the effect of the pandemic on its finances has meant TfL has required Government funding support to keep public transport in London operating. Passenger numbers continue to recover but are still significantly below pre-pandemic levels at 80 per cent on the Tube and 90 per cent on buses. The current Government funding settlement is predicated on, among other things, TfL generating between £0.5-£1.0bn per annum as additional revenue from 2023.

One of the options identified to contribute to generating this additional revenue was to explore withdrawing from the Travelcard Agreement. Through this process, this changed to become a proposal to explore partial withdrawal from the Travelcard Agreement by withdrawing Day Travelcards only (**the Proposal**). This would mean that TfL would no longer sell or accept any Day Travelcards on its services. It would also mean that TfL would not accept any Day Travelcards sold by TOCs and other third-party retailers for travel on TfL's services. It is anticipated that, if TfL ceases to accept Day Travelcards, relevant TOCs will also stop selling Zone 1-6 Travelcards; however, they determine their own products and services and have not confirmed their intentions. None of this would affect PAYG caps on Oyster or contactless, which will continue to apply as they do now to all TfL services and relevant TOC services within the TfL zones.

The Proposal is estimated to generate approximately £40m of additional revenue per year. At present, the revenue from Day Travelcards is shared between TfL and the TOCs operating services in London who are parties to the Travelcard Agreement. It is apportioned according to the distance travelled on each party's services within zones 1-6. This means that resulting revenue apportioned to TfL can be lower than the revenue received by TfL from the same journeys made with PAYG tickets. If this proposal is implemented, TfL would receive the full value of PAYG tickets sold by TfL for travel on its services, which is estimated to generate the circa £40m per year for TfL. The additional revenue estimated to be generated from the Proposal will help contribute to ensuring that TfL secures and maintains financial sustainability, by generating additional revenue in line with the provisions of government funding settlements.

The objectives of this EqIA are to assess the equality impacts of the Proposal on those with protected characteristics and on low incomes so that, further to the public sector equality duty (PSED), the Mayor can consider and have due regard to the identified impacts in deciding whether to approve the Proposal.

The Travelcard Agreement

The Travelcard Agreement is an agreement between Transport for London (TfL) (via its subsidiary company Transport Trading Limited (TTL)) and Train Operating Companies (TOCs) whereby TfL and relevant TOCs provide and market a range of tickets, known as Travelcards, which give unlimited travel on bus, Tube, tram, DLR, London Overground, Elizabeth line and National Rail services in London. Day Travelcards are therefore sold by both TfL and the TOCs who are parties to the Travelcard Agreement (and are also sold by third parties) and they are accepted by TfL for travel on its network, and by the TOCs for travel on their networks, within London zones. The Travelcard Agreement contains terms and conditions which govern the arrangements for providing and honouring acceptance of Travelcards. It also sets out the mechanisms for revenue apportionment of Travelcards between TTL and the TOCs.



Types of Day Travelcard

Day Travelcards can be bought for unlimited travel all day or unlimited off-peak travel only (after 09:30 Monday – Friday and any time weekends and bank holidays), to cover various zones. When travelling from outside London, customers can buy an “add-on” of a zones 1-6 Day Travelcard to be included on their National Rail train ticket into London. There are a number of types of Day Travelcard.

A **Standard Day Travelcard** (adult or child): An “in-boundary” Standard Day Travelcard can be purchased for travel within the zones on TfL services, or a TOC service within London. A Standard Day Travelcard may be purchased as an “add-on” to National Rail tickets into London (“out-boundary”).

In-boundary means travel within the zones on TfL services, or a TOC service within London. Out-boundary customers are those who travel into London having started their journeys outside of London.

Discounted Day Travelcard are off-peak and the price of the Day Travelcard is discounted by 1/3rd for customers who hold certain Railcards. See below.

Group Day Travelcards are available for groups of 10 or more people travelling together at all times in a single day after 09:30 weekdays and anytime Saturday, Sunday and public holidays. They are available to buy at station ticket machines, Visitor Centres, at London Overground and National Rail ticket offices, and in advance online from travel trade partners. They are primarily bought by visitors to London, mainly domestic but also overseas visitors, as well as tourist groups and student groups. It is designed to support large groups of tourists travelling in London, for leisure purposes. They cannot be bought as part of an add-on to a National Rail Day-return train ticket.

A **Family Travelcard** is available from some TOCs for family groups of up to two adults and four children, travelling to and around London during off-peak times. The ticket provides unlimited travel throughout London on National Rail and TfL services within zones 1-6 for the day. It is available to buy through selected TOCs and cannot be bought through TfL.

The **Weekend Travelcard** is a special ticket only sold by Chiltern Railways at Aylesbury, Stoke Mandeville, Wendover or Great Missenden and is valid for 2 consecutive weekend days (Saturday, Sunday or Bank Holiday Monday). It allows people to make a return journey from the specific stations to London Marylebone on each of the 2 days, as well as unlimited travel in London on both days. This includes all TfL services.

Purchases of Day Travelcards

In the period April 2022 to February 2023 around 19m Day Travelcards were sold. Based on these figures it would mean that if the Proposal is approved it would impact around 65,000 customers per day who use Day Travelcards, with around 40 per cent of these tickets bought outside the London area at National Rail stations. **Appendix 1** contains a breakdown of the number of different Day Travelcard issued.



Cost of Day Travelcards and PAYG Caps and paper tickets

Standard Day Travelcard

Day Travelcards cover all zones from 1-9. A Zone 1-4 adult ticket costs £15.20, regardless of peak or off-peak travel. Beyond zone 4 there are peak and off-peak options. See table below for standard adult Day Travelcard prices and equivalent PAYG daily caps.

Zones	Daily Peak PAYG cap	Daily Off-Peak PAYG cap	Day Travelcard Anytime (Peak)	Day Travelcard Off-Peak
1 - 2	£8.10	£8.10	£15.20	£15.20
1 - 3	£9.60	£9.60	£15.20	£15.20
1 - 4	£11.70	£11.70	£15.20	£15.20
1 - 5	£13.90	£13.90	£21.50	£15.20
1 - 6	£14.90	£14.90	£21.50	£15.20
1 - 7	£16.20	£14.90	£27.20	£16.20
1 - 8	£19.10	£14.90	£27.20	£16.20
1 - 9	£21.20	£14.90	£27.20	£16.20

It will be seen from the above table that due to the PAYG cap, travel within zones 1-9 is cheaper at both peak and off-peak times using Oyster (PAYG) or contactless (PAYG) than using a Day Travelcard. The same applies to Zip Oyster where travel will be significantly cheaper, particularly off-peak. The 11-15 Zip Oyster daily PAYG off-peak cap for zones 1-9 is £1.70; compared to a zones 1-6 Child Day Travelcards which is £7.60 off peak. Oyster cards with a Young Visitor discount applied will also be cheaper in-boundary compared with child Standard Day Travelcards.

Out-of-boundary

The examples below show that, for customers travelling into London from a National Rail station with a Standard Day Travelcard added on to the ticket, off-peak travel is likely to become slightly more expensive (c.£1-3) when using/switching to PAYG, if the zones 1-2 daily PAYG cap is reached; or materially more (c. £3-10), if the zones 1-6 daily cap is reached. Peak travel is also likely to become more expensive using PAYG.

An adult off-peak return from Brighton, with a Travelcard add-on, is currently £28.60. The same ticket without the Travelcard add-on is £22.50. If the customer then travelled in zone 1-2 using PAYG, and reached the daily cap of £8.10, in total they would pay £30.60: an increase of £2. A child off-peak return from Brighton with a Travelcard add-on is £20.45. The same ticket without the Travelcard add-on is



£18.50. If the customer then travelled in zone 1-2 in London using PAYG on Zip Oyster and reached the daily off-peak cap of £1.70, in total they would pay £20.20: a decrease of twenty five pence.

The current cost of an adult one-day travelcard from Reading to London is £29.60, compared to an off-peak return to Paddington of £24.00. If this MD is approved, the future cost of an off-peak return plus a zone 1-2 cap using a contactless bank card/Oyster would be £24.00 plus £8.10 – totalling £32.10, which is an additional £2.50. If the customer used PAYG to reach the off-peak daily zones 1-6 cap, their travel would be £9.30 more expensive than using a Day Travelcard add-on. A child off-peak return from Reading with a Travelcard add-on is £14.80. The same ticket without the Travelcard add-on is £15.00. If the customer then travelled in zone 1-2 in London using PAYG on Zip Oyster and reached the daily off-peak cap of £1.70, in total they would pay £16.70: an increase of £1.90.

Regarding peak travel, an adult peak return from Brighton with a Travelcard add-on, is currently £59.00. The same ticket without the Travelcard add-on is £62.00. If the customer then travelled in zone 1-2 using PAYG, and reached the daily cap of £8.10, in total they would pay £70.10: an increase of £11.10. If the customer used PAYG to reach the off-peak daily zones 1-6 cap, which is £14.90, their travel would be £15.90 more expensive than using a Day Travelcard add-on. An adult peak return from Reading with a Travelcard add-on, is currently £63.20. The same ticket without the Travelcard add-on is £55.20. If the customer then travelled in zone 1-2 using PAYG, and reached the daily cap of £8.10, in total they would pay £63.30: an increase of 10p. If the customer used PAYG to reach the off-peak daily zones 1-6 cap, which is £14.90, their travel would be £6.90 more expensive than using a Day Travelcard add-on.

Discounted Day Travelcards

The following Railcards give 1/3 off Off-Peak Day Travelcards: 16-25 Railcard, 26-30 Railcard, Senior Railcard, Family Railcard, HM Forces Railcard, Network Railcard, Two Together Railcard, Veterans Railcard, Annual Gold card, and the Disabled Persons Railcard.

See table below for the difference in price between a standard off-peak adult Day Travelcard and a discounted adult Day Travelcard and the saving Railcard holders make.

Zones	Day Travelcard Off-Peak	Discounted Day Travelcard Off-Peak using Railcards	Current Saving
1-2	£15.20	£10.00	£5.20
1-3	£15.20	£10.00	£5.20
1-4	£15.20	£10.00	£5.20
1-5	£15.20	£10.00	£5.20
1-6	£15.20	£10.00	£5.20
1-7	£16.20	£10.60	£5.60



1-8	£16.20	£10.60	£5.60
1-9	£16.20	£10.60	£5.60

It is important to note that should the Proposal be approved, these discounts will continue to be available by having the discounts applied to an Oyster card; although the discounts cannot be applied to contactless payment mechanisms and so possession of Oyster is required to get the discount.

As well as giving 1/3 off Off-Peak Day Travelcard prices, the below Railcards also have additional benefits by allowing for more than one discounted Day Travelcard to be bought:

Family Railcard – additionally up to three adults and four children

HM Forces Railcard -additionally up to four children

Network Railcard - up to three adults and four children

Two Together Railcard – for two adults

Veterans Railcard – additionally up to four children

Annual Gold card – additionally up to three adults and four children

Disabled Persons Railcard – additionally for one accompanying companion.

These discounts for additional travellers would not be available to apply as a discount to Oyster should the Proposal be approved.

Appendix 2, section 1 sets out some of the different cost implications for customers of withdrawing the various Discounted Day Travelcards identified above. It provides illustrations of scenarios that are generally likely to have both the least and most negative costs implications. Where examples include the cost of purchasing an Oyster card, the £7 cost of obtaining one has been used. Other cards can be purchased by those eligible, such as child Zip Oysters or 60+ Photocard. While the fee for these is more expensive (respectively £15 and £20), they provide free or discounted travel on TfL services.

Group Day Travelcard (for Off-Peak travel only)

The below table shows the difference in price between an adult Group Day Travelcard and the PAYG daily cap equivalent if using on contactless/Oyster.



Zones covered by Travelcard	Cost of Adult Travelcard	Equivalent PAYG cap
1 - 6	£10.00	£14.90
1 - 9	£10.60	£14.90

The below table shows the difference in price between a child Group Day Travelcard and the PAYG daily cap equivalent with a YVD on a standard Oyster card, as well as the PAYG daily cap using a Zip Oyster card.

Zones covered by Travelcard	Cost of Child Travelcard	Equivalent PAYG cap with Young Visitor discount	Equivalent PAYG cap using Zip Oyster photocard
1-6	£5.00	£7.45	£1.70
1-9	£5.30	£7.45	£1.70

Appendix 3 contains more examples of how much travel could cost for customers using Group Day Travelcards compared to using PAYG on contactless/Oyster.

30,694 in-boundary Group Day Travelcards were bought from TfL in the period April 2022 – February 2023.

14,771 in-boundary Group Day Travelcards were bought from TOCs in the period April 2022 – February 2023.

2,257,688 out-boundary Group Day Travelcards were bought form TOCs in the period April 2022 – February 2023.

Travel is likely to become less seamless for these customers, as they would no longer be able to turn up and travel, as they currently do when buying this ticket in advance from outside London. While adults can switch to PAYG using contactless or Oyster card, children would need to already have a Zip Oyster photocard⁴, get one in advance and pay an admin fee or get the Young Visitor discount set on an Oyster card. For large groups, setting a Young Visitor discount on multiple Oyster cards could cause congestion at station ticket machines and affect staff resources at stations.

Family Travelcard

If the Proposal is approved, TfL would no longer accept these tickets on its services, so it is envisaged that they would no longer be sold by the relevant TOCs. The examples in **Appendix 2, section 2** show how travel could become significantly more expensive for customers who would no longer be able to buy a Family Travelcard.

In the period mentioned a total of 972,867 Family Travelcards were issued at TOC stations.



Weekend Travelcard

Users of this Travelcard would need to buy a London Terminal ticket and then switch to PAYG on contactless or Oyster card for travel in London. If needing an Oyster card, customers would have to pay £7 for a new one. Children would need a Zip Oyster photocard and pay the admin fee or get a Young Visitor discount set on a standard Oyster card. Either way, there would be an additional cost of getting a card. See **Appendix 2, section 4** for examples of how much travel could cost for customers without the Weekend Travelcard.

Paper tickets

For people who cannot pay using PAYG on contactless or Oyster card they would need to pay for travel using paper single or return tickets. There would be no opportunity for people in this cohort to benefit from a daily price cap, and so they may pay more for travel (depending on their journeys). See **Appendix 2, section 5** for examples of the cost of travel using single and return tickets. The cost of a return ticket is twice the price of a single. While Day Travelcards can be used on TfL's bus network, paper tickets/rail tickets cannot be used on that network, which is cashless.



Additional background information and relevant analysis

While there is evidence that significant numbers of customers use Day Travelcards, there is limited data on the specific demographics of those using them. For the purposes of this EqIA, key stakeholders were asked to provide information as to Day Travelcard usage and potential impacts of withdrawal. Relevant information that was provided by stakeholders is used in this EqIA, as appropriate.

The general consequences of withdrawing them are identified at the start of this document.

These general consequences give rise to two issues that are relevant to assessing impacts. First, the ability of customers to use contactless or an existing Oyster card. Second, the ability of customers to obtain Oyster cards as required, use them, and/or pay higher fares. Evidence on these matters relevant to the different Protected Groups is presented below. Section 3 then assesses the impacts on the Protected Groups.

2. The Evidence Base

Consider evidence in relation to all relevant protected characteristics and inclusion group listed in the table below. Please note that change always disproportionately impacts all protected characteristics, so there should be no blank boxes. Consideration should be given not just to the proposal impact but how you intend to communicate and engage on the proposed change.

Introductory information

Since the introduction of Travelcards, PAYG has been introduced and changed the way the majority of customers pay for travel, meaning customers are less dependent on having to pay in advance for their travel. Advances in technology have given customers more options to pay using PAYG to travel, with customers able to use contactless cards and smart devices (phones, watches, etc.)

As a method of paying for travel on TfL services, latest data from 30 April 2023 – 27 June 2023, tells us 82.6 per cent were made using PAYG with contactless or Oyster card, or free via a concessionary card. This is a very significant proportion of all journeys made on the TfL network.

The remainder were made using Day Travelcards (4.2%), LU singles and returns (0.4%), One Day Bus & Tram Passes (0.1%) and season tickets (12.7%).

Research conducted by TfL says many feel Travelcards represent better value. It is also worth noting that paying for travel with PAYG gives some customers less confidence in controlling spending and does not allow them to ringfence money for travel. We also know that Travelcards encourage



customers to make more journeys. The same research also says that people believe that it is incumbent on TfL to make a wide variety of ticket options available and Travelcards are part of that.

People who are familiar with Travelcards and who budget using them would be impacted by having to switch to PAYG; however, customers may find that PAYG, with daily caps, is a more attractive and a less expensive way to pay for travel. This is because they only pay for the journeys they make, rather than paying upfront for journeys to be made in the future, as is the case with a Day Travelcard.

If using PAYG on Oyster card there are many methods available to people when topping up PAYG on the card; this includes topping up at station ticket machines, online, via the TfL app, at Oyster Ticket Stops or setting up Auto top-up. There may be some people who are unfamiliar with these options, which could be mitigated by raising awareness of these options. Oyster cards can be topped up using cash at most station ticket machines, and at Oyster Ticket Stops which are prevalent throughout London.

In the UK, all bankcards are now contactless and many customers are using the digital equivalent such as Apple Pay and Google Pay. The minimum age for a contactless debit card is 13 years old. Latest research shows that 91 per cent of all bank card transactions were made using contactless. Those customers who, for whatever reason, choose not to use contactless or cannot access it (because they do not have a bank account or smart device), can get an Oyster card and add credit to PAYG or alternatively purchase prepaid card and use that. A prepaid card is essentially a PAYG debit card, where money is added to the card and can be used contactless on the TfL network to benefit from PAYG daily caps. They are generally useful for those who are unable to get a bank account due to a poor credit history or lacking proof of address, those who wish to use them to budget, and children. However, there are often application fees – usually of up to £10 – to set up the account, and there are sometimes other fees involved too, such as monthly or transaction fees. It is also worth noting that if someone does not have a bank account or does not want to or cannot use contactless, then the same barriers may affect their choice in using a pre-loaded debit card or an Oyster card.

Protected Characteristic and inclusion group	Data and evidence to support your assessment <i>(Record here the data you have gathered about the diversity of the people potentially impacted by this work. Please include any research on the issues affecting inclusion in relation to your work).</i>
Age	<p>Oyster card ownership and use of contactless</p> <p><i>Young People</i></p> <p>Data from 2019/20 shows that Younger Londoners are the most likely equality group to hold an Oyster card: 55 per cent of 16 to 24-year-olds have one, compared to 40 per cent of all Londoners who have an Oyster card.</p>



Data from 2018 shows that Londoners aged 16-24 are more likely than all Londoners to use an Oyster payment option (81 per cent compared with 72 per cent). Young people under 16 are considerably less likely to have an Oyster card (31 per cent of 11 to 15-year-olds have one), continuing to reflect the greater opportunities for free or reduced travel for this age group.

Possession of passes/cards entitling the holder to free or reduced travel is higher among under-25s than all Londoners; it is particularly elevated for 11 to 15-year-olds with 74 per cent in possession of a free bus travel pass, although this is lower than the proportion observed in 2013/14 (83 per cent) This data reflects possession specifically, rather than use of passes/cards for free or reduced travel. Conversely, use of contactless options is lower among Londoners aged 16-24 than all Londoners (42 per cent of 16-24s, compared with 49 per cent of all Londoners).

Older People

Data from 2019/20 shows that Older Londoners are least likely to hold an Oyster card: only five per cent of Londoners aged 65 or over own one, compared with 40 per cent all Londoners. The majority of older Londoners (aged 65 or over) hold an Older Persons' Freedom Pass (92 per cent) and this accounts for the lower proportion of Oyster cards held in this group. For this reason, Older Londoners aged 65 and over are less likely than all Londoners to pay for public transport, or therefore use a method of payment.

Data from 2018 says that: only 13 per cent of Older Londoners aged 65 and over use Oyster pay as you go to pay to use the TfL network, compared to 53 per cent of all Londoners; only 14 per cent of Older Londoners aged 65 and over use a contactless payment (card) to pay to use the TfL network, compared with 47 per cent of all Londoners; and only 2 per cent of Older Londoners aged 65 and over use a contactless payment (phone) to pay to use the TfL network, compared with 12 per cent of all Londoners.

Data from 2019/20 shows that Londoners aged 65-69 are more likely to have an Oyster card than people aged over 80: eight per cent for 65 to 69-year-olds compared with three per cent of Londoners aged 80 or over (nine per cent and three per cent respectively in 2013/14). Ninety-two per cent of 65-year-olds or over have an Older Persons' Freedom Pass (92 per cent in 2013/14). This drops to 89 per cent for those aged 80 or over.

It will be seen from the above that the data referred to derives from 2018 and 2019/20. This remains the best data TfL possesses as to the matters set out above.

Information on Contactless and cash use²

² Some of the information cited here and below arises from work TfL has done previously in considering proposals for its stations to become cashless. Should the proposal to withdraw Day Travelcards be approved, **customers would still be able to use cash to top up Oyster cards**. The information relating to the use of cash / cashless below is relevant to the proposal to withdraw Day Travelcards because the alternatives to cash payments are digital payments, and some of the impacts of the proposal depend on the extent to which customers have access to contactless/digital payment methods.



The Payment Markets Report, UK Finance (2021)³ found that 83 per cent of people in the UK now use contactless, with no age group over 16 or region falling below 75 per cent usage.

The young person's money index found that roughly half of those surveyed (age 15-18) have a current account and a debit or cash card. Of those surveyed, 52 per cent have used a contactless payment method.⁴

Age UK research finds that many older people still rely heavily on cash, with some being completely dependent. In February 2020, around 2.4 million people aged 65 and over in the UK relied on cash to a great extent in their day-to-day life - representing around 1 in 5 (21 per cent) of the older population. Furthermore, cash dependency is linked with digital inclusion. 51 per cent of those aged 65+ do not use internet banking, or have not recently, (which encompasses digital payments), compared to only 10 per cent of those aged 25-34.⁵

Digital inclusion for older people aged 75+ has been improving – 41 per cent were digitally active in 2017, compared with 64 per cent in 2020. Furthermore, Online banking has increased significantly in popularity among older age groups. In February 2020, 72 per cent of adults aged 65-74 and 54 per cent of adults aged 75+ banked online, compared with 60 per cent and 27 per cent in 2017, respectively. The use of mobile banking apps has also increased for older people: up from just 1 per cent in 2017 to 14 per cent in 2020 for those aged 75+, and up from 10 per cent to 24 per cent for those aged 65-74.⁶

London TravelWatch's paper, A cashless London Transport (November 2020), found that 260,000 adults in London are without a bank account. Some with a bank account cannot access debit or credit cards or choose not to use them. Many children have to pay a half fare for non-bus journeys but do not have access to a contactless card.

Some of concerns expressed by stakeholders in response to TfL's 2020-21 proposals to extend cashless operations, included the fact that school children and older people could be disadvantaged by those proposals because they may not have access to bank accounts or electronic payment facilities.

Feedback from TfL Area Managers submitted via an online survey on the cashless operation of TfL's stations during the Coronavirus pandemic identified that two key issues were: £5 minimum top up (specifically for school children); cash users (predominantly school children and trade workers).

³ <https://www.ukfinance.org.uk/sites/default/files/uploads/SUMMARY-UK-Payment-Markets-2021-FINAL.pdf>

⁴ [young-persons-money-index-2021-22-final.pdf \(libf.ac.uk\)](#)

⁵ [behind the headlines shortchanged.pdf \(ageuk.org.uk\)](#)

⁶ [Financial Lives 2020 survey: the impact of coronavirus | FCA](#)



Latest research by [London TravelWatch](#) says that people aged 55+ are more likely to be digitally disadvantaged, and less likely to be able to access to a contactless payment method. As a comparison eight per cent of digitally disadvantaged people have paid for travel using a contactless payment method vs 45 per cent of people who are digitally included.

Information on income, employment and barriers to travel

Data from Travel in London: Understanding our diverse communities 2019 says younger Londoners are marginally more likely to have a lower household income than all Londoners. Among Londoners aged under 25, thirty-two per cent have household income of less than £20,000, compared to twenty-eight per cent of all Londoners.

Data from Travel in London: Understanding our diverse communities 2019 says Londoners aged 16-24 years old are more likely to be deterred from using public transport due to costs than Londoners as a whole.

Data from Travel in London: Understanding our diverse communities 2019 says people on low incomes are also more likely to be older people. 24 per cent of those on low income are also 65+ and but also therefore are more likely to have an Older Persons' Freedom Pass.

Data provided by data.london.gov.uk shows that children in London are more likely to be in poverty than adults.

[Trust for London provides the following data on the proportion of Londoners in poverty after housing costs](#) in 2019/20 by age as:

0-4	35%
5-9	36%
10-14	41%
15-19	41%
20-24	23%
25-29	19%
30-34	27%
35-39	22%
40-44	24%
50-54	25%
55-59	23%
60-64	25%
65-69	27%



	<table border="1" data-bbox="640 156 931 280"> <tr> <td>70-74</td> <td>25%</td> </tr> <tr> <td>75-79</td> <td>25%</td> </tr> <tr> <td>80-84</td> <td>24%</td> </tr> </table> <p>Other</p> <p>Using the evidence in Appendix 1, we know that over 2.6m Travelcards have been bought in the past year by people who are in the under-16 cohort.</p>	70-74	25%	75-79	25%	80-84	24%
70-74	25%						
75-79	25%						
80-84	24%						
<p>Disability <i>(please consider all forms of disabilities)</i></p>	<p>Oyster card ownership and use of contactless</p> <p>Freedom Passes are the most common ticket type used on TfL services by disabled Londoners (66 per cent). Twenty-seven per cent of disabled Londoners use Oyster PAYG, a considerably smaller figure than non-disabled Londoners where the ticket is used by 61 per cent. Oyster card ownership is lower than among non-disabled Londoners (26 per cent compared to 63 per cent of non-disabled), although this may be partly explained by the use of the Disabled Persons’ Freedom Pass and Older Persons’ Freedom pass.</p> <p>Disabled Londoners are less likely to own a smartphone than non-disabled Londoners (73 per cent compared with 87 per cent) – although the gap has narrowed over time.</p> <p>Data from ticket types held in 2019/20 shows that disabled Londoners are more likely to hold an Older Persons’ Freedom Pass (46 per cent compared with 13 per cent of non-disabled Londoners) and less likely than non-disabled Londoners to hold an Oyster card (19 per cent compared with 42 per cent of non-disabled Londoners). Seventeen per cent of disabled people hold a Disabled Persons’ Freedom Pass <i>[Note: the eligibility criteria for a Disabled Persons’ Freedom Pass is different to the criteria to qualify as disabled within the meaning of the Equality Act 2010, with the former being stricter than the latter – meaning that some people who meet the definition of disabled within the meaning of the Equality Act 2010 may not be eligible for a Disabled Persons’ Freedom Pass]</i>.</p> <p>Data from 2018 shows that Oyster pay as you go was the most common method for paying for public transport use by disabled Londoners and non-disabled Londoners alike (46 per cent and 55 per cent respectively). <i>[Note: customers holding Freedom passes do not pay for their travel]</i>. Contactless payment cards were used by thirty-six per cent of disabled Londoners, compared to fifty one per cent of non-disabled Londoners. Contactless payment (via a mobile device) was used by 8 per cent of disabled Londoners compared to 14 per cent non-disabled Londoners. Overall, disabled Londoners were less likely than non-disabled Londoners to use</p>						



an Oyster payment option (65 per cent compared with 74 per cent). Use of contactless options is also lower among disabled Londoners than non-disabled Londoners (40 per cent, compared with 53 per cent).

It will be seen from the above that the data referred to derives from 2018 and 2019/20. This remains the best data TfL possesses as to the matters set out above.

Non-London disabled customers who are eligible can apply for a Disabled Person's English National Concessionary Travel Scheme card, which gives free travel on TfL buses at any time on a Saturday, Sunday or bank holiday and from 9:30am to 11pm on any other day.

Contactless and cash use

The 2020 Financial Lives survey found that 3 per cent of adults who rely on cash to a great or very great extent do so because they have a disability and cannot use digital devices. It also found that 26 per cent of those in poor health were likely to rely on cash to a very great or great extent.⁷

Some of the key concerns expressed by stakeholders in response to TfL's 2020-21 proposals to extend cashless operations, included the fact that the following could be disadvantaged by those proposals people with disabilities, including dementia, autism or mobility related disabilities on the basis that these people or groups may not use or have access to bank accounts or electronic payment facilities.

In May 2021, TfL commissioned an independent research agency (2CV) to explore how cash is used in wider society and on the transport network. The 2CV research⁸ revealed that approximately 7 per cent of Londoners would be denied the ability to travel if cash acceptance was withdrawn across the network. This tends to be customers on lower incomes, unemployed or disabled customers.

Income, employment and barriers to travel

Trust for London [evidence](#) shows that 35 per cent of families in London including a disabled person were in poverty in 2019/20, compared to 25 per cent of families that did not include a disabled person.

Data from Travel in London: Understanding our diverse communities 2019 says thirty-four per cent of disabled Londoners have household income of less than £10,000 compared with 10 per cent of non-disabled Londoners. 61 per cent of disabled people in London are on low income.

⁷ <https://www.fca.org.uk/publication/research/financial-lives-survey-2020.pdf>

⁸ [2CV Cashless Research Summary](#)



	<p>Households that include a disabled person are more likely to be in poverty than those who do not include a disabled person, as cited in the report – Travel in London: Understanding our diverse communities 2019.</p> <p>The main barriers that disabled Londoners experience and which have an impact upon their ability to make public transport journeys as often as they would like are often the same as those expressed by non-disabled Londoners, namely overcrowding and concerns about the antisocial behaviour of other customers. Disabled customers also see accessibility-related issues, cost and comfort as barriers to travel, as cited in the report – Travel in London: Understanding our diverse communities 2019.</p> <p>Other</p> <p>According to Department for Transport’s statistical release – Transport: Disability and Accessibility Statistics, England 2020, there are 148,608 Disabled Persons Railcards in circulation.</p>
<p>Sex (<i>male, female, non-binary and other identities</i>)</p>	<p>Oyster card ownership and use and use of contactless</p> <p>Oyster card ownership between men and women is similar, with 42 per cent of women compared to 39 per cent of men possessing one, according to 2016/17 data used in the report Travel in London: Understanding our diverse communities 2019.</p> <p>According to the same report 17 per cent of women and 15 per cent of men have an Older Persons’ Freedom Pass. The difference between men and women in this instance can be attributed to the fact that there are more women than men who are older.</p> <p>53 per cent of women in London and fifty-two per cent of men in London use PAYG for regular travel.</p> <p>34 per cent of women and 35 per cent of men use Travelcards as a method of payment for travel in London.</p> <p>It will be seen from the above that the data referred to derives from 2018 and 2019/20. This remains the best data TfL possesses as to the matters set out above.</p> <p>Contactless and cash use</p>



	<p>The 2CV research⁹ commissioned by TfL (see above) revealed that approximately 7 per cent of Londoners would be denied the ability to travel if cash acceptance was withdrawn across the network. This tends to be customers on lower incomes (as well as unemployed or disabled customers).</p> <p>Some of the key concerns expressed by stakeholders in response to TfL’s 2020-21 proposals to extend cashless operations, included the fact that women who are the victims of domestic abuse could be disadvantaged by those proposals because they may not have access to bank accounts or electronic payment facilities.</p> <p>Income, employment and barriers to travel</p> <p>As cited in the report from Travel in London: Understanding our diverse communities 2019; at 55 per cent, women are more likely to be in a low-income household than men.</p> <p>As cited in the report from Travel in London: Understanding our diverse communities 2019, 20 per cent of women compared with 8 per cent of men are unemployed and 71 per cent of Londoners aged 16 or over and not employed are women.</p> <p>As cited in the report from Travel in London: Understanding our diverse communities 2019, women in London in full-time employment receive 24 per cent less in median full-time pay than their male counterparts.</p>
<p>Gender reassignment</p>	<p>One in four trans people (25 per cent) have experienced homelessness at some point in their lives.</p> <p>According to Annual Diversity and Inclusion impact report 2019/20 (tfl.gov.uk) it is not possible to accurately report the number of Londoners who would describe themselves as trans.</p> <p>Data source: lgbt in britain - trans report final.pdf (stonewall.org.uk)</p>
<p>Marriage/civil partnership</p>	

⁹ [2CV Cashless Research Summary](#)



<p>Pregnancy/maternity</p>	
<p>Race</p>	<p>Oyster card ownership and use and use of contactless</p> <p>According to data from 2019/20, 46 per cent of Black, Asian and Minority Ethnic BAME people possess an Oyster card, compared to 39 per cent of white people.</p> <p>Oyster pay as you go is the most common ticket type used by Londoners on all types of public transport, regardless of ethnic group. It is used by a higher proportion of BAME Londoners than white Londoners. 64 per cent of BAME Londoners use Oyster pay as you go, compared with 50 per cent of white Londoners.</p> <p>19 per cent of white Londoners have Freedom Passes compared with 10 per cent of BAME Londoners. These differences are largely linked to the differing age profile of BAME and white Londoners. The proportion of BAME and white Londoners aged 65 and over who hold a Freedom Pass is similar: 91 per cent and 93 per cent respectively.</p> <p>It will be seen from the above that the data referred to derives from 2018 and 2019/20. This remains the best data TfL possesses as to the matters set out above.</p> <p>Contactless and cash use</p> <p>Contactless card payments are used by a higher proportion of BAME Londoners than white Londoners (54 per cent compared with 45 per cent).</p> <p>The 2CV research¹⁰ revealed that approximately 7 per cent of Londoners would be denied the ability to travel if cash acceptance was withdrawn across the network. This tends to be customers on lower incomes (as well as unemployed or disabled customers).</p> <p>Income, employment and barriers to travel</p> <p>BAME Londoners are more likely to live in low-income households, are likely to cite affordability as a barrier to transport and are more likely to use buses than the Tube. 44 per cent of BAME people are from a low-income household, as cited in the report from Travel in London: Understanding our diverse communities 2019,</p> <p>According to research on poverty by Joseph Rowntree Foundation, 35 per cent of people in London who identify as minority ethnic are in poverty. Additionally, further research shows that 54 per cent are Bangladeshi, 46 per cent are Pakistani and 42</p>

¹⁰ [2CV Cashless Research Summary](#)



	<p>per cent are Black. Comparatively, 19 per cent of people in London who identify as White are in poverty, which is the same percentage as the rest of the UK.</p> <p>60 per cent of BAME Londoners say cost is a barrier to travel on public transport in London compared to 38 per cent of white Londoners, as cited in the report from Travel in London: Understanding our diverse communities 2019.</p>
Religion or belief	
Sexual orientation	
<p>Disadvantaged, inclusion groups and communities e.g., carers, refugees, low income, homeless people etc.</p>	<p>The report - Travel in London: Understanding our diverse communities 2019, provided the following information:</p> <p>Younger Londoners are more likely to have a lower household income than all Londoners. Among Londoners aged under 25, 32 per cent have household income of less than £20,000, compared to 28 per cent of all Londoners.</p> <p>At 55 per cent, women are more likely to be in a low-income household than men.</p> <p>People on low incomes are also more likely to be older people. 24 per cent of those on low income are also 65+ and therefore are more likely to have an Older Person's Freedom Pass.</p> <p>61 per cent of disabled people in London are on low income.</p> <p>BAME Londoners from low-income households are more likely to fall in the younger person category. 44 per cent of BAME people are from a low-income household.</p> <p>Londoners on low incomes tend to be women and older, BAME and disabled people and those not in work. Low income largely reflects working status, though the underlying causes may be tied to the cost of housing, childcare and transport as well as access to education, qualifications, and health. More children living in poverty are part of low-income working families than are in workless families. Londoners on low incomes are more likely to use buses than the Tube.</p>



Deprivation and socio-economic disadvantage of local communities e.g., people with lack of access to housing, education, social resources, geographic location, and income

In a paper, [Understanding cash reliance – qualitative research, Savanta ComRes & the FCA \(July 2021\)](#),¹¹ Savanta ComRes and FCA qualitative research¹² identified needs-based cash users: those that are financially excluded (often without a bank account), homeless and refugees. They have limited access to key services including benefits, tax credits and support with housing.

In May 2021, TfL commissioned an independent research agency (2CV) to explore how cash is used in wider society and on the transport network. The 2CV research¹³ revealed that approximately 7 per cent of Londoners would be denied the ability to travel if cash acceptance was withdrawn across the network. This tends to be customers on lower incomes, unemployed or disabled customers.

Some of the key concerns expressed by stakeholders in response to TfL's 2020-21 proposals to extend cashless operations, included the fact that people on low incomes could be disadvantaged by those proposals on the basis that these people or groups may not have access to bank accounts or electronic payment facilities.

According to [Financial inclusion report 2018-19 \(publishing.service.gov.uk\)](#) there are 1.2m people in the UK who are classed as unbanked and according to [Left behind Londoners: Digital Exclusion and Disadvantage in London Transport \(londontravelwatch.org.uk\)](#) there are 260,000 adults in London without bank accounts.

According to [House of Lords - Tackling financial exclusion: A country that works for everyone? - Select Committee on Financial Exclusion \(parliament.uk\)](#) there is a direct correlation between unbanked people and poverty. Those who are unbanked may find it difficult to pay £7 for a new Oyster card, or keep a card topped up with PAYG credit. Without an Oyster card they may also find it difficult to pay for travel using single paper tickets, as paper tickets are more expensive than using PAYG.

The Access to Cash Review, report 2019¹⁴ found that 17 per cent of the UK population are unsure of how they would cope, or would not cope at all in a cashless society. The reasons why are varied: 2 per cent of the population have physical or mental health issues that can make it hard or unsafe to use digital payments (contactless may reduce this); 4 per cent of the population are paid in cash; 7 per cent can't get/don't have access to a debit card; 7 per cent can't afford to go into debt so they use cash for budgeting. It found the biggest indicator of cash dependence is income. The poorer you are, the less likely you are to have access to the digital infrastructure.

The Financial Conduct Authority's (FCA) Financial Lives 2020 Survey (**Feb 2021**) found that in total 1.2 million adults (2.3 per cent) in the UK were 'unbanked' in February 2020, which is not significantly different from 1.3 million in 2017. Groups most likely to be unbanked include the unemployed (11 per cent), adults with no educational qualifications (7 per cent), those who work in the gig

¹¹ [Understanding cash reliance – qualitative research - July 2021 \(fca.org.uk\)](#)

¹² [Understanding cash reliance – qualitative research - July 2021 \(fca.org.uk\)](#)

¹³ [2CV Cashless Research Summary](#)

¹⁴ [final-report-final-web.pdf \(accesstocash.org.uk\)](#)

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	economy (7 per cent) and those who are digitally excluded (7 per cent). ¹⁵ A key indicator of cash dependence is income: The lower the income of the individual, the more likely they were to depend on cash. In February 2020, 5.4 million adults (10 per cent) relied on cash to a very great or great extent in their day-to-day lives. They paid for everything or most things in this way. A similar proportion (10 per cent) say they do not know how they would cope, or that they would not cope at all, in a cashless society. Dependency on cash is highest among older adults. For example, 42 per cent of those 85+ rely on cash to a great or very great extent. Other groups who rely heavily on cash include the digitally excluded (46 per cent), those with no educational qualifications (31 per cent) and those in poor health (26 per cent).
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3. Engagement and consultation

Outline how engagement and consultation with inclusion groups, people who share a protected characteristic, and other project teams have informed your work

	Yes	No	Don't Know	Comments
Has there been any engagement or consultation activity relating to this strategy, service, business plan, programme, or project?	X			There was an information gathering exercise targeted at key stakeholders, seeking information on Day Travelcard usage and potential impacts of withdrawal and mitigations.
List the relevant stakeholders and inclusion groups you have consulted/engaged or intend to consult/engage with below. Please include any relevant consultation or engagement undertaken prior to completing this EQIA which relates each protected characteristic and inclusion group.				
Stakeholders and inclusion groups consulted/engaged with	Date		Feedback comments / issues raised	
	18 April 2023 – 6 June 2023		A list of stakeholders who responded to the engagement, their comments, and a summary of comments received from the public to TfL's Have Your Say page are included in Appendix 5. Attached to Appendix 5 are copies of responses received from all stakeholders.	

¹⁵ <https://www.fca.org.uk/publication/research/financial-lives-survey-2020.pdf>



	Yes	No	Don't Know	Comments
	Yes	No	Don't Know	Comments (state clearly what this engagement or consultation will be and how it will be organised)
Does there need to be any further engagement or consultation? If yes, please add this as an action to the action planning section below. Please note that in some circumstances your work may require formal consultation		X		

Feedback summary on proposal to withdraw Day Travelcards.

In April 2023 TfL asked key stakeholders for any information on Day Travelcard usage and potential impacts of withdrawal and mitigations - to help develop this EqIA. The engagement ran from 18 April until 6 June.

As well as stakeholder feedback TfL also received a number of comments from the public. On reviewing these comments and the stakeholder feedback it is possible to identify some common themes.

It is worth noting that the themes identified were not all relating to protected characteristics, as some comments and stakeholder feedback voiced concerns about the negative environmental impact of withdrawing Day Travelcards, as well as making London a less attractive place to visit, including the effects this could have on the London economy. There was also general concern opined that not being able to buy a National Rail return ticket to London with a Travelcard add-on would make travel into London more expensive, once factored-in with having to switch to PAYG.



For the purpose of the EqIA and protected characteristics, the following themes emerged from the stakeholder feedback and public comments received by TfL:

19 per cent of 1,333 public comments on the proposal were concerned about the general increase in cost of travel, with a further 6 per cent saying they were concerned about the cost impact on young people and families (more expensive for young people/families). There was also concern about how the withdrawal of Day Travelcards would make it [travel] more difficult for people who are older, less mobile or disabled.

Stakeholder feedback

46 stakeholders provided feedback on the proposal to withdraw Day Travelcards.

The majority of the feedback (70%) voiced concerns that travel would become more expensive for people coming into London from outside London.

Disabled People

Concerns were about the impact that withdrawing Day Travelcards would have on disabled people. In particular around maximum journey fares, as it was said that disabled people often need longer to complete journeys due to taking breaks or waiting on assistance. For this reason, some people prefer using Day Travelcards, as they give confidence in travelling in London, without concern about being charged for exceeding maximum journey times.

17 per cent of stakeholder feedback voiced concern about losing the ability to buy a discounted Day Travelcard for a companion, thus increasing the cost of travel for a disabled person's companion.

There was also general concern from stakeholders that switching to PAYG on contactless or Oyster card could cause confusion amongst children, the elderly and the disabled.

Other themes that were felt could impact disabled people were:

- Concerns about physically breaking a journey to obtain a second ticket or use Oyster/contactless
- Buying multiple tickets for a single journey will be confusing

Digitally Excluded

Another theme that emerged is how withdrawing Day Travelcards could impact the digitally excluded.

The East Coulsdon Residents Association said:

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“... [the proposal to withdraw Day Travelcards] discriminates against those that are unable to use modern technology and do not have bank accounts and the poorest members of our community”.

While **Railfuture** commented that:

“...the financially and digitally excluded will all suffer, including those without bank cards (or available funds on them) who may need to pay higher fares at Ticketing Vending machines...”.

London Travelwatch added:

“...nearly 4 in 10 digitally excluded and disadvantaged people agree that the use of technology has made things harder for them to travel, and digitally excluded people are already likely to make fewer journeys across London”.

Railcards

Withdrawing Day Travelcards, and therefore the ability to use Railcards to buy 1/3rd Discounted Day Travelcards, has been a popular theme raised by stakeholders. In relation to protected characteristics, stakeholders were concerned that, if Day Travelcards were withdrawn, it would impact age (younger and older people) and disabled people.

Amongst the concerns raised for these people were:

- How travel could become more expensive
- It would remove the integrated ticket/travel function of Railcards

There was also a concern that Railcards cannot be added to an Oyster card/contactless payment method to get 1/3 off off-peak pay as you go travel, making travel more expensive. This was reflected in stakeholder feedback, with 33 per cent highlighting this.

There is a more detailed summary of public and stakeholder responses to the engagement exercise contained in Appendix 4, including a percentage breakdown of the themes identified. Copies of responses received from all stakeholders are also attached to Appendix 4.

4. Impact assessment – Protected characteristics and inclusion groups

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Given the evidence listed in section 2 and 3, consider and describe the potential impacts this work could have on people with protected characteristics and other inclusion groups.

The key positive impact of the Proposal is that it is an important financial contribution to TfL achieving the necessary additional revenue required by government, in order to achieve financial sustainability. Achieving financial sustainability ensures TfL can deliver an efficient and effective public transport network in the long term, which will have positive impacts for all customers (particularly those with protected characteristics, low-income) and for London. Not achieving financial sustainability would result in TfL being unable to maintain current levels of service. This would create adverse conditions that would limit TfL’s ability to generate revenue to deliver longer-term capital funding, negatively impacting all customers and London as a whole. In addition, daily PAYG caps mean that in-boundary customers would pay less using contactless or Oyster than Day Travelcards. Some customers may also pay less with PAYG as they will only have to pay for the journeys they make, rather than having to pay a flat upfront price for a Day Travelcard where they may or may not make sufficient journeys to break even. Also, children who do not currently have Zip Oyster may be encouraged to obtain this, and benefit from the extensive free and discounted travel this provides. However, it is recognised that if approved, the Proposal would result in the withdrawal of a product that is currently used by significant numbers of customers and may increase the cost and convenience of travel for some. For these reasons, although there are some positive impacts, on balance and overall, the impacts are identified as negative in the table below.

	Employee	Customer	Positive	Neutral	Negative	No Impact	Comments and actions to mitigate or take forward (please include actions to mitigate the potential negative impact for this protected characteristic)
Age		X			X		<p>Adults</p> <p>Significant numbers of adult customers currently use the different types of Day Travelcards, particularly out of boundary customers. The extent to which these customers also have contactless means of payment or Oyster is unknown; although, in general, use of contactless/Oyster PAYG on the TfL network is high (see above). In addition, in 2021, 83 per cent of card transactions in the UK used contactless, with no age group of 16 or over, or any region, falling below 75 per cent usage.</p> <p>The amount of people that do not use contactless in the UK (17 per cent) is in itself a significant amount. In addition, material amounts of adults in London (260,000) and in the UK (approximately 1.2m) do not have a bank account and are therefore unlikely to have access to contactless payment means. On the basis that these figures are generally reflective of those customers who use Day Travelcards, not insignificant</p>



	Employee	Customer	Positive	Neutral	Negative	No Impact	Comments and actions to mitigate or take forward (please include actions to mitigate the potential negative impact for this protected characteristic)
							<p>numbers of these customers would not have access to a contactless payment option.</p> <p>Contactless payment options are not, however, necessary in order for customers to benefit from daily PAYG caps. These are also available on Oyster, which can be bought in advance online or at any Tube, London Overground and most Elizabeth line stations, some DLR stations, at a TfL Visitor Centre or at Oyster Ticket Stops in many newsagents throughout London. Oyster can be topped up at all these places as well as online, and at ticket machines in all National Rail stations in London. The cost of an Oyster card is £7, plus a minimum top up of £5 at machines or 10 pence at Oyster Ticket Stops. Oyster cards can be topped up using cash or debit/credit cards at most station ticket machines, and at Oyster Ticket Stops.</p> <p>Older people</p> <p>The extent to which older people use Day Travelcards is not specifically known. Approximately 850,000 Discounted Day Travelcards were bought out of boundary using a Senior Railcard from April 2022-February 2023, compared with 17,000 in boundary. This likely reflects the fact that Londoners over 60 are eligible for free off-peak travel on the TfL network and most National Rail services in London (using the 60+ Photocard and Older Person's Freedom Pass). Older people in the UK tend to use contactless less than other age groups. They are also more likely than other eligible age groups to not have a bank account. On this basis, older people using Day Travelcards may be more likely to require an Oyster card to benefit from PAYG caps. This is supported by information provided by stakeholders which contends that some older people find PAYG more difficult to use and do not wish to use their debit cards, including for security and other reasons. TfL will ensure that, as part of an awareness campaign, ways to pay is highlighted.</p>



	Employee	Customer	Positive	Neutral	Negative	No Impact	Comments and actions to mitigate or take forward (please include actions to mitigate the potential negative impact for this protected characteristic)
							<p>For those older out of boundary customers who use Day Travelcards but have an Oyster card or contactless PAYG, travel is likely to become more expensive, unless they have a Senior Railcard and have the discount applied to their Oyster card. Those that do not already have an Oyster card would need to buy one in order to have a Senior Railcard discount applied to their Oyster card. The £7 fee to buy one plus the top up fee would be an additional single expense and older people may be more likely to be affected by this because they are more likely than some age groups to live in low-income households.</p> <p>Although Oyster can but does not have to be bought or topped up online or in advance and can be bought or topped up from a vast number of outlets in London, it is not available at stations of origin outside of London. Consequently, those older people using Day Travelcards as an add-on to an out of boundary National Rail ticket and who are digitally excluded or find technology difficult, may need to buy and/or top up Oyster cards upon arrival in London. This may be confusing or daunting for some older people, compared with buying Day Travelcards at their station of origin, especially if their first stop in London is not a TfL station that sells Oyster cards. This could also be problematic for such older customers, if they have to find and walk to an Oyster Ticket Stop to buy an Oyster card. Older people are more likely to have mobility issues and parts of south London, for example, can be some distance from a Tube station. However, it is anticipated that in many cases out of boundary customers' initial destination within London is likely to be at or close to a TfL station and or one of the many Oyster Ticket Stops throughout London. There are 3,700 Oyster Ticket Stops in London, many of which are located near stations. Older people are more likely than other age groups to have dementia or cognitive impairments and may find using contactless / Oyster, touching in and out, more confusing, or</p>



	Employee	Customer	Positive	Neutral	Negative	No Impact	Comments and actions to mitigate or take forward (please include actions to mitigate the potential negative impact for this protected characteristic)
							<p>difficult than the relative simplicity of using Day Travelcards. For the reasons given above, they may also find the process of applying a Senior Railcard discount to an Oyster confusing or difficult.</p> <p>Large groups of older overseas group visitors may also be negatively impacted by the withdrawal of Group Day Travelcards for the reasons above, particularly if many of the travelling group have to purchase Oyster.</p> <p>Children and younger people</p> <p>Significant numbers of Child Day Travelcards are used, mainly out of boundary Standard (c. 1m off-peak) and Group (c. 1.2m) Child Day Travelcards. This amount of out of boundary use may in part be related to the fact that significant numbers of children have 5-10 Zip Oyster and 11-15 Zip Oyster cards, which provide free and discounted travel that is cheaper 'in-boundary' than standard child Day Travelcards. It is not known how many of those using child Day Travelcards also have a Zip Oyster but it is assumed most do not. It is unlikely that significant numbers of these children will have access to their own contactless bank card or payment device. In addition, where a child between the age of 11-15 has a contactless bank card the ticketing system is not able to distinguish that it is a child and will charge an adult fare. Consequently, children that use child Day Travelcards and do not already have a Zip Oyster will need to obtain one, get a Visitor Oyster card in advance or a standard Oyster and have a Young Visitor's discount applied on arrival in London. An adult (accompanied by the child the YVD is for) can go to any Tube or Overground station, or Visitor Centre, to have it applied. The only condition is that the child must be present when the adult is requesting YVD is set on the card.</p>



	Employee	Customer	Positive	Neutral	Negative	No Impact	Comments and actions to mitigate or take forward (please include actions to mitigate the potential negative impact for this protected characteristic)
							<p>While the Zip Oyster and a Visitor Oyster can only be obtained in advance, the Young Visitor Discount (YVD) can be applied to a standard Oyster card at most Tube stations; at TfL Visitor Centres (Heathrow, Kings Cross, Liverpool Street, Piccadilly and Victoria stations); and at Victoria National Rail station ticket. Obtaining an Oyster with a YVD applied is fairly straightforward and readily available.</p> <p>That said, the cost and process involved in obtaining a standard Oyster with the YVD applied could increase the cost and inconvenience of child travel; particularly for families with several children, including overseas visitors, when compared to the Child Day Travelcard and Family Day Travelcard, and may be a barrier to travel. Travelling groups of children – school children and student groups, including from overseas – could be similarly negatively impacted, in this regard. At present, the Group Day Travelcard allows groups of 10 or more children to buy a Group Day Travelcard (zones 1-6 for £5 and a zones 1-9 for £5.30). These are easier to obtain than Zip Oyster/Visitor Oyster cards because they are available to buy from TfL and TOC stations inside and outside zones 1-6, as well as TfL Visitor Centres and in advance online from travel trade partners. They also provide the discounted travel without having to go through the process of having the Young Visitor discount applied. They are, however, materially more expensive than the 11-15 Zip Oyster daily cap.</p> <p>If a Zip Oyster is not held / if a YVD is not obtained, the alternative options for those using Day Travelcards are to buy child paper tickets, which are significantly more expensive relative to Zip fares/ capped fares and Young Visitor discount fares and cannot be used on the bus network; or to buy a standard Oyster without the YVD applied and pay adult fares.</p> <p>As above, for families with several children, or travelling groups of children, this could significantly increase the cost and</p>

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	Employee	Customer	Positive	Neutral	Negative	No Impact	Comments and actions to mitigate or take forward (please include actions to mitigate the potential negative impact for this protected characteristic)
							<p>inconvenience of travel compared with using child Standard / Family / Group Day and various Discounted Travelcards and may be a barrier to travel. The Discounted Day Travelcard, discounted with a National Railcard, provides a third off the price of an adult/child Day Travelcard and the following Railcards allow for more than one Discounted Day Travelcard to be bought: Family Railcard – additionally up to three adults and four children; HM Forces Railcard -additionally up to four children; Network Railcard - up to three adults and four children; Two Together Railcard – for two adults; Veterans Railcard – additionally up to four children; Annual Gold card – additionally up to three adults and four children; Disabled Persons Railcard – additionally for one accompanying companion. It is anticipated that these products will not be available if TfL stops accepting Day Travelcards.</p> <p>The cost and process for obtaining Oyster with a YVD applied and the alternatives of not being able to do so (see above) - may also negatively impact on children / families who are digitally excluded and/or in poverty and may be a barrier to travel. Evidence says that in 2021/2022 there were 4.2m children living in poverty in the UK, with further evidence citing 800,000 of these children live in London.</p> <p>However, the cost of purchasing an Oyster is a single expense. In addition, for those that obtain a Zip Oyster (by applying in advance online paying the £15 fee), this provides significant travel benefits for children.</p> <p>Young people (16-25) and those aged between 26-30 may also be affected. Significant numbers of Discounted Day Travelcards were bought using the 16-25 Young Persons Railcard, and the 26-30 Railcard, mostly out of boundary: from April 2022 to February 2023, approximately 1.3m 16-25 Discounted Day Travelcards and 650,000 26-30 Discounted Day Travelcards were bought out of boundary. People of these ages are,</p>

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	Employee	Customer	Positive	Neutral	Negative	No Impact	Comments and actions to mitigate or take forward (please include actions to mitigate the potential negative impact for this protected characteristic)
							<p>however, are most likely to have and use contactless payment options, and the PAYG caps will mean that in boundary travel will be cheaper, although out of boundary travel may be more expensive. These Discounted Day Travelcards can be added to Oyster cards (although not contactless bank cards) enabling these customers to retain the discount at no cost, if they already have an Oyster card, or pay a single payment of £7 to buy a new one.</p> <p><u>Points to note in response to the above and actions to take forward as mitigations</u></p> <p>As is noted above, Oyster is readily available. A principal concern arising from the above is if groups of children / families with several children all have to purchase Oyster, including to have the YVD applied. This will be mitigated by TfL ensuring that within its ongoing communications and engagement exercises – including with schools, colleges, visitor travel bodies, etc – the consequences of the withdrawal of Day Travelcards are widely understood; and that the benefits of (and process for obtaining) Oyster/Zip Oyster are similarly understood. Zip Oyster confers significant travel benefits to children, and this is not restricted to Londoners.</p> <p>In addition, it is to be noted that the Family Day Travelcard is a TOC product; not a TfL one. The Discounted Day Travelcard (discounted with a National Railcard) is a Rail Delivery Group (RDG) product; not a TfL one. It would be for the TOCs to identify further offers on their services in lieu of a cessation of these Day Travelcard products.</p> <p>TfL is exploring the possibility of Railcard discounts for contactless pay as you go travel. However, this is complex and not an immediate mitigation.</p>



	Employee	Customer	Positive	Neutral	Negative	No Impact	Comments and actions to mitigate or take forward (please include actions to mitigate the potential negative impact for this protected characteristic)
Sex (male, female, non-binary and other identities)		X			X		<p>There is no material difference in the possession or use of contactless between men and women in the UK.</p> <p>In terms of the potential additional expense for customers who use Day Travelcards switching to PAYG on contactless or Oyster, arising from potentially higher fares and/or the need to buy Oyster or paper tickets (identified above), women may be more affected by this than men, because women are more likely to be on lower incomes.</p>
Gender reassignment		X			X		<p>It is not considered that there are any impacts specific to this group arising from the Proposal.</p>
Race and Ethnicity		X			X		<p>There is no material difference in the possession or use of contactless between BAME and white people in the UK.</p> <p>In terms of the potential additional expense for customers who use Day Travelcards switching to PAYG on contactless or Oyster arising from potentially higher fares and/or the need to buy Oyster or paper tickets (identified above), BAME people may be more affected by this than white people, because BAME people are more likely to be on lower incomes.</p>
Religion and belief		X					<p>It is not considered that there are any impacts specific to this group arising from the Proposal.</p>



	Employee	Customer	Positive	Neutral	Negative	No Impact	Comments and actions to mitigate or take forward (please include actions to mitigate the potential negative impact for this protected characteristic)
Disability (please consider all forms of disabilities)		X			X		<p>The specific extent to which disabled people use Day Travelcards is not known. In 2019/20, seventeen per cent of disabled Londoners held a Disabled Persons' Freedom Pass, which provides free travel at all times within London. However, not all Londoners who are disabled within the meaning of the Equality Act 2010 will qualify for a Disabled Persons' Freedom Pass, because the eligibility criteria for that pass is stricter. In 2016/17, 45 per cent of Londoners who are disabled within the meaning of the Equality Act 2010 held an Older Persons' Freedom Pass, which provides free off-peak travel on the TfL network and most National Rail services.</p> <p>There will, however, be significant numbers of Londoners aged below 60 (and do not qualify for free travel through age) who are disabled within the meaning of the Equality Act 2010 but do not qualify for a Disabled Persons' Freedom Pass, and who will therefore have to pay for their travel. In addition, disabled people living outside London have to pay for their travel within London (unless they are travelling on the bus with a Disabled Person's Bus Pass under the English National Concessionary Travel Scheme).</p> <p>However, both may be eligible for a Disabled Persons' Railcard, which currently provides one third discount off Day Travelcards for the disabled person holding the card and a companion.</p> <p>From April 2022 to February 2023, approximately 6,500 Discounted Day Travelcards were bought in boundary using a Disabled Persons' Railcard, and approximately 116,500 Discounted Day Travelcards were bought out of boundary using a Disabled Persons' Railcard.</p> <p>From the research undertaken and information provided by stakeholders, it is understood that some disabled people use</p>



	Employee	Customer	Positive	Neutral	Negative	No Impact	Comments and actions to mitigate or take forward (please include actions to mitigate the potential negative impact for this protected characteristic)
							<p>Day Travelcards because they find them easier to use and are less problematic than PAYG on contactless or Oyster.</p> <p>One reason given was that PAYG provides a maximum time limit for completing journeys (this is for fare-evasion purposes), and it is said that some disabled customers sometimes exceed this time limit – for reasons related to their disability, taking breaks, time taken to use ramps etc. Some respondents reported being charged a maximum daily fare, exceeding their actual cost of travel. It is also said that the refund process is complex/inconvenient and only allows up to three refunds a month.</p> <p>Other reasons why it is said that disabled people find PAYG more difficult are that some wheelchair users find it difficult and stressful trying to get close to ticket barriers to tap in and out, but with Day Travelcards they say they show the ticket and are let through. Respondents also said that blind and visually impaired people sometimes find it difficult to see and use machines properly and also to locate tap out readers because they are hard to see; that disabled people are generally more likely to have difficulties with PAYG and tapping in and out, with the potential to get charged the maximum fare; including because of the maximum time limit on journeys which, if exceeded, results in a maximum fare being deducted; that some people with learning disabilities use Day Travelcards to help them budget; and that they find the PAYG system complicated to understand and use compared to Day Travelcards. This may also be the case for those with mobility or language barriers.</p> <p>For those disabled people that use out of boundary standard Day Travelcards but have an Oyster card or contactless PAYG, travel may become more expensive, unless they have a Disabled Persons' Railcard and have the discount applied to their Oyster card, or buy an Oyster card to do this, if they do not</p>



	Employee	Customer	Positive	Neutral	Negative	No Impact	Comments and actions to mitigate or take forward (please include actions to mitigate the potential negative impact for this protected characteristic)
							<p>have one. For those that do not have an Oyster card or contactless, the £7 fee to buy Oyster plus the top up fee would be an additional single expense. Disabled people may be more likely to be affected by this than non-disabled people, as they are more likely to live in low-income households or poverty.</p> <p>Although, as is noted above, Oyster cards can but do not have to be bought or topped up online or in advance and can be bought or topped up from a vast number of outlets in London, it is not available at stations of origin outside of London. Those disabled people using Day Travelcards as an add-on to an out of boundary National Rail ticket and who are digitally excluded or find technology difficult, may need to buy and/or top up Oyster cards upon arrival in London. This may be confusing or daunting for some, especially those with learning difficulties or cognitive impairment, compared with purchasing Day Travelcards at their station of origin, especially if their first stop in London is not a TfL station that sells Oyster cards. This could also be problematic for such disabled customers, as well as disabled people with mobility issues, if they have to find and walk to an Oyster Ticket Stop to buy an Oyster card. Parts of south London, for example, can be some distance from a Tube station. However, it is anticipated that in many cases out of boundary customers' initial destination within London is likely to be at or close to a TfL station and or one of the many Oyster Ticket Stops throughout London.</p> <p>For those disabled people who use the Discounted Day Travelcard (discounted by one-third with a Disabled Persons Railcard), they will need to have the discount applied to their Oyster card or buy an Oyster card if they do not have one. The £7 fee to buy one plus the top up fee but would be an increased additional single expense – see above. For the reasons given above, some disabled people may also find the process of applying a Disabled Persons' Railcard to an Oyster confusing or difficult. Although a Disabled Persons' Railcard can be added</p>

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	Employee	Customer	Positive	Neutral	Negative	No Impact	Comments and actions to mitigate or take forward (please include actions to mitigate the potential negative impact for this protected characteristic)
							<p>to Oyster to provide a third off off-peak daily fares and price caps, Disabled Persons' Railcard card currently also allows a disabled person to buy a child rate Day Travelcard for a companion. This would no longer be available to buy through TfL.</p> <p><u>Points to note in response to the above and actions to take forward as mitigations</u></p> <p>As is noted above, Oyster is readily available, including at the 3,700 Oyster Ticket Stops in London, many of which are located near stations.</p> <p>While it may be the case that some disabled people find Day Travelcards easier to use, TfL gate-lines and ticket machines all comply with relevant accessibility regulations. In addition, all frontline TfL are trained to offer assistance and support in regard to accessibility and this will continue. TfL also has various arrangements and services in place to support accessibility, which are identified here. On maximum journey times, these are in place for fare evasion purposes and are considered to be generous and accommodating of extra time that may be needed by some disabled customers (maximum journey times can be found here). The responses received to the engagement on this point are noted and we have identified that 2 per cent of public comments and 17 per cent of stakeholder feedback share this opinion. Within the six-month notice period needed to withdraw Day Travelcards, TfL will monitor Maximum Journey Time refund applications and will continue to deal with customers on a case-by-case basis, ensuring that refunds are given where appropriate. If appropriate, consideration will be given to extending Maximum Journey times.</p>



	Employee	Customer	Positive	Neutral	Negative	No Impact	Comments and actions to mitigate or take forward (please include actions to mitigate the potential negative impact for this protected characteristic)
							<p>TfL will ensure that within its ongoing communications and engagement exercises, the consequences of the withdrawal of Day Travelcards are widely understood; and that the benefits of (and processes for obtaining) the most suitable tickets are widely understood.</p> <p>TfL is exploring the possibility of Railcard discounts being applied to contactless pay as you go journeys. However, this is complex and not an immediate mitigation.</p> <p>Concerns have been raised by respondents about the fact that companions to Disabled Railcard users would no longer be able to obtain discounted travel (as they do with Day Travelcards). While this is a point to note, this concession is an offer provided by the TOCs, not TfL. It would be open to the TOCs to identify further offers on their services in lieu of a cessation of this. TfL has recently explored the possibility of allowing companions to travel with Freedom Pass holders and this was found to be unfeasible.</p>
Sexual orientation		X			X		It is not considered that there are any impacts specific to this group arising from the Proposal.
Marriage or civil partnership		X			X		It is not considered that there are any impacts specific to this group arising from the Proposal.



	Employee	Customer	Positive	Neutral	Negative	No Impact	Comments and actions to mitigate or take forward (please include actions to mitigate the potential negative impact for this protected characteristic)
Pregnancy and maternity		X			X		It is not considered that there are any impacts specific to this group arising from the Proposal.
Disadvantaged, inclusion groups and communities e.g., carers, refugees, low income, homeless people etc		X			X		<p>In terms of the potential additional expense for customers who use Day Travelcards switching to PAYG on contactless or Oyster arising from potentially higher fares and/or the need to buy Oyster or paper tickets (identified above), disadvantaged, excluded groups may be more affected by this than others, because they are more likely to be on lower incomes.</p> <p>In addition, paper tickets are often preferred by carers or disabled people who have to expense everything for budgeting reasons because paper tickets are easy to document and do not involve accessing bank details. Withdrawing the paper Travelcard could make this more difficult for people, especially those who are digitally excluded, as the alternative of using Oyster card, opening an online account and registering the card in order to get journey history, may not be an option.</p> <p>People on low incomes are more likely to be older people (24 per cent of those on low income are also 65+) and therefore are more likely to own a Freedom Pass.</p> <p>TfL offers a wide range of concessions, offering free and discounted travel and TfL will continue to offer and promote these concessions.</p>



	Employee	Customer	Positive	Neutral	Negative	No Impact	Comments and actions to mitigate or take forward (please include actions to mitigate the potential negative impact for this protected characteristic)
							See also points to notes and actions to take forward as mitigations identified above.
Deprivation and socio-economic disadvantage of local communities e.g., people with lack of access to housing, education, social resources, geographic location, and income		X			X		<p>People in this cohort are more likely to be unbanked and therefore would not have access to contactless as a means of payment. Oyster cards with PAYG would remove the need for contactless as a means of payment.</p> <p>Some may find adding the minimum of £5 credit to an Oyster card prohibitive, as is needed when topping up at a station ticket machine; however, Oyster Ticket Stops have a minimum top-up of 10 pence, which may make topping up an Oyster card easier.</p> <p>TfL offers a wide range of concessions, offering free and discounted travel and TfL will continue to offer and promote these concessions.</p> <p>See also points to notes and actions to take forward as mitigations identified above.</p>

1 Action planning

List all planned actions - actions which could help mitigate any potential negative impacts. Additionally, please remember to include in your plan any 'positive action'.



	Actions	Owner	Deadline
1	Run a marketing campaign to raise awareness of PAYG on contactless and Oyster, as well as concessions, including Zip Oyster photocards.	Marketing	January 2024
2	Work with Local Councils to raise awareness of concessions.	Payments/Local Councils & Partnerships Team	January 2024
3	TfL will monitor Maximum Journey Time applications and will continue to deal with customers on a case-by-case basis, ensuring that refunds are given where appropriate. If appropriate, consideration will be given to extending Maximum Journey times.	Payments/Contact Centre Operations	January 2024
4			
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2 Monitoring and evaluation

Detail how you will or plan to monitor and evaluate the success of the mitigation actions and the overall impact of your decision or proposal

1.	How would you monitor and evaluate the success of the mitigating actions once your proposal has been implemented?	<p>TfL will monitor maximum journey time refund applications for a minimum of six months' from implementation of the proposal.</p> <p>TfL will monitor customer feedback / complaints once Day Travelcards have been withdrawn (should it be decided to do this), to assess the effectiveness of its proposed communications campaign.</p>
2.	How would you monitor the actual impact of your proposal or decision once your proposal has been implemented?	<p>TfL will monitor customer feedback / complaints once Day Travelcards have been withdrawn (should it be decided to do this), to assess the effectiveness of its proposed communications campaign.</p> <p>TfL will continue to engage with its relevant stakeholders to understand any issues of concern.</p>



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3 Decision-Making

Based on the above assessment, please select one of the options below that describe what you propose to do next. It is important that you provide the reason(s) for your decision and the evidence that supported these reasons.

1	Continue with your work because the assessment demonstrates that the work will have no potential negative or adverse impact on equality and inclusion groups.	
2	Justify and continue with your work despite negative equality impacts, and because there are other factors which make it reasonable for you to decide to continue with your work.	As is identified above, which is summarised in Appendix 4 to this EqIA, there are various cost of travel implications for customers by not being able to use Day Travelcards, and using PAYG. Some of these are positive, some of the are negative, even where contactless/Oyster is already possessed (see Appendix 4). Where there are material or significant increases in the cost of travel, this is a negative impact, particularly for those on low incomes, and those with protected characteristics who are more likely to be on low incomes. In the case of children, these impacts are mitigated by the free and discounted travel that Zip Oyster provides, despite the one off £15 cost of obtaining one and the advance application process. While this is an additional expense, Zip Oyster confers significant benefits of free and heavily discounted travel on all TfL services and it is anticipated that over time many child customers would recoup the cost of this through the savings to be made by using the Zip card. TfL also plans to promote awareness of suitable ticketing options, including in Oyster/Zip Oyster cards. In the case of group travel, these are (with the exception of Group Day Travelcards) TOC products and it



		<p>would be open to the TOCs to identify further offers on their services in lieu of a cessation of these Day Travelcard products.</p> <p>For those that do not have contactless or are digitally excluded, Oyster is readily available, and can be purchased and topped up (with a minimal top up fee) using cash at any of the 3,700 Oyster Ticket Stops throughout London (as well as the other various / numerous places identified above). The Oyster system has been in place for 20 years and is well known and understood. It is in place alongside a number of different concessions and discounts that TfL provides/accepts; including free child travel; Zip Oyster photocard; 60+ Oyster; Older Persons Freedom Pass; and the Disabled Persons Freedom Pass.</p> <p>However, a potentially important impact of the proposal is the fact that contactless/Oyster can only be used by one person, and so if all/many of a travelling group require Oyster to obtain PAYG caps this could significantly increase the cost of travel. In addition, applying for a Zip Oyster or obtaining Oyster and applying a Young Visitor discount to may present an inconvenience or difficulty, particularly for groups or families with several children travelling from “out-boundary” where Oyster is not available at stations of origin. Again, TfL plans to promote awareness of the consequences of the withdrawal of Day Travelcards in the six month notice period and promote awareness of suitable ticketing options, including in Oyster/Zip Oyster cards.</p> <p>TfL gate-lines and ticket machines all comply with relevant accessibility regulations, and all frontline TfL staff are trained to offer assistance and support in regard to accessibility and this will continue. TfL also has various arrangements and services in place to support accessibility, which are identified here. Maximum journey times and issues will also be kept under review in the six month notice period and changed if appropriate.</p> <p>While some out-boundary customers that need to purchase Oyster may need to locate and travel to a place selling the cards, this needs to be considered in the context of how readily obtainable Oyster is.</p> <p>The above needs to be considered in the context that the proposed withdrawal of Day Travelcards is an important financial contribution to TfL achieving the necessary additional revenue required by government, in order to achieve financial sustainability. Achieving financial sustainability ensures TfL can deliver an efficient and effective public transport network in the long term, which will have positive impacts for all customers and for London. Not achieving financial sustainability would result in TfL being unable to maintain current levels of service. This would create adverse conditions that would limit</p>
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		<p>TfL’s ability to generate revenue to deliver longer-term capital funding, negatively impacting all customers (particularly those with protected characteristics, low-income) and London as a whole. In addition, in-boundary customers / Londoners will pay less switching to PAYG and some customers may pay less with PAYG as they will only have to pay for the journeys they make, rather than having to pay a flat upfront price for a Day Travelcard where they may or may not make sufficient journeys to break even. Also, children who do not currently have Zip Oyster may be encouraged to obtain this, and benefit from the extensive free and discounted travel this provide.</p> <p>Overall, in the context of the above, and in view of TfL’s proposed mitigations, it is considered reasonable – proportionate and justified - for the proposal to proceed, despite the fact that it will have some negative impacts.</p>
3	<p>Change or adapt your work to ensure it does not adversely or disproportionately impact certain groups of people, communities, or miss opportunities to affect them positively</p>	
4	<p>Stop your work because there is a high probability of noticeable discrimination and negative impacts which cannot be objectively justified. Further research work may be needed.</p>	

4 Sign off

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EQIA author	
Name:	Billy McConnachie
Title:	Product Manager
Date:	21/06/23
Signature	
EQIA reviewer (superuser or D&I team)	
Name:	
Title:	
Date review completed:	
Signature	
D&I team representative	
Name:	
Title:	
Date:	
Signature	
EQIA signed off by (Senior accountable person)	
<p><i>The EQIA should be signed off by a senior accountable manager or senior project sponsor. They are ultimately responsible for ensuring that the EQIA requirements are taken onboard and delivered as part of the project deliverables and/or escalated to the decision-makers where necessary. By signing, they are confirming that the equality impacts have been identified, understood, and considered; those affected by the proposal/decision have been involved or consulted; and there are plans to mitigate any potential negative impact and monitor the actual impact of the proposal/decision after implementation.</i></p>	
Name:	Dale Campbell
Title:	Head of Revenue Analysis
Date:	21/06/2023
Signature	



Document history and version control

Document history	Version	Date	Summary of changes
	0.1	19/05/23	First draft
	0.2	7/6/23	Removed examples of costs of travel and created separate appendices. Updated information in section 4.
	0.3	16/6/23	Updated references to tickets impacted by the proposal and added additional cost analysis to appendix 2.
	0.4	19/6/23	Compiled stakeholder feedback into one appendix (appendix 4)



Privacy Statement

Transport for London (TfL), its subsidiaries and service providers, will use your personal information for the purposes of assessing Customer Equality Impact and administration. Your personal information will be properly safeguarded and processed in accordance with the requirements of privacy and data protection legislation. We will not use your data for marketing purposes. For more information on how TfL processes your personal information please visit www.tfl.gov.uk/privacy

