

# THE WILTSHIRE CONCESSIONARY TRAVEL SCHEME

## ARRANGEMENTS FOR REIMBURSEMENT

### With effect from 1 April 2020 until 31<sup>st</sup> March 2021 Final scheme

These Arrangements for Reimbursement must be read in conjunction with the separate Scheme Definition, and set out the terms for reimbursement with effect from 1 April 2020.

These Arrangements for Reimbursement are designed to meet the requirements set down in the Transport Act 1985, the Transport Act 2000, the Concessionary Bus Travel Act 2007 and the associated Regulations in accordance with Guidance issued by the Department for Transport, together with the requirements of EC Regulation 1370/2007.

### Definitions

1. In these Arrangements for Reimbursement:
  - i. All definitions set out in the Scheme Definition shall apply herein;
  - ii. The “Travel Concession Authority” responsible for this Scheme is Wiltshire Council and the term “Travel Concession Authority” shall also mean “Administering Authority” in the context of matters deriving from the Transport Act 1985;
  - iii. The “Coordinating Authority” is Wiltshire Council;
  - iv. “Payment Periods” shall be:
    - 1 April to 30 June
    - 1 July to 30 September
    - 1 October to 31 December
    - 1 January to 31 March
  - v. “Financial Year” shall mean a twelve month period starting on 1 April in one year and ending on 31 March in the following year;
  - vi. “Statutory Elements” of the Scheme mean any provision(s) of the Scheme which allow holders of the National Pass to benefit from Statutory Minimum Travel Concession;
  - vii. “Statutory Minimum Travel Concession” means the entitlement to travel without the payment of a fare for Passenger Journeys made by an Eligible Person on Eligible Services not starting before 0930 hours or after 2300 hours on normal weekdays and at any time on Saturdays, Sundays and/or public Holidays
  - viii. “Discretionary Elements” of the Scheme means any provision(s) of the Scheme enabled by the 1985 Act but not required by the 2000 Act or the 2007 Act which allows individually or in combination Passenger Journeys:
    - a) To be made outside the statutory core time of 0930 hrs and 2300 hrs on weekdays other than public holidays;
    - b) To be made by Companions;
    - c) On other than Eligible Services.

- ix. "Standard Method" is the method of calculating Total Reimbursement as set out in these Arrangements for Reimbursement unless any operator can provide convincing evidence to demonstrate to the satisfaction of the Co-ordinating Authority that the standard method will not lead to the Participating operator being reimbursed in accordance with the regulations
- x. "Additional Costs" are the total additional costs incurred by an operator in carrying Eligible Persons on journeys that constitute Generated Travel.
- xi. "Average Fare" or "Normal Fare" means the average adult fare forgone calculated in accordance with either the "Discounted Fare" or the "Basket of Fares" methods as set out within the most up-to-date version of the Department for Transport's Reimbursement Calculator tool. For the avoidance of doubt, the appropriate method will be selected in accordance with the criteria set out in the Department for Transport's most up-to-date guidance on operator reimbursement.
- xii. "Amenity Element" is an additional service element other than normal bus travel. When used in connection with fares, it includes where fares are rendered significantly high as a result of that element in relation to the general level of fares for comparable journeys in the Principal Area in accordance with section 96(6) of the 1985 Act;
- xiii. "Gross Revenue Foregone" shall be the gross value of travel made under the terms of the Scheme calculated according to the best estimate of the number of Passenger Journeys made and the best estimate of the Normal Fare that would have been paid in respect of those journeys before any adjustments in respect of Generated Travel;
- xiv. "Generated Travel" is defined as the proportion of additional journeys made over and above the number that would have been made had there been no travel concessions and arising as a direct result of the entitlement to the travel concession provided by the Scheme;
- xv. "Net Revenue Foregone" shall be the cost to the Participating Operator in terms of the net value of lost income as a result of participating in the Scheme. This will be the value of Gross Revenue Foregone adjusted to take account of Generated Travel calculated by application of a Reimbursement Factor;
- xvi. "Marginal Operating Costs" are the element of Additional Costs that are costs to a bus operator of carrying an additional generated passenger journey assuming a fixed level of service;
- xvii. "Marginal Capacity Costs" are the element of Additional Costs that are the costs to a bus operator of necessarily increasing the capacity of bus services above that which would be provided in the absence of concessionary travel due to Generated Travel, by using the existing bus fleet more intensively to provide that additional capacity through increased frequency;

- xviii. "Peak Vehicle Requirement Costs" are the element of Additional Costs that are the costs associated with any requirement to run additional vehicles in the peak period due to Generated Travel.
- xix. "Total Reimbursement" shall be the Revenue Reimbursement plus all Additional Costs.
- xx. "Reimbursement Payment" means the payment made to a Participating Operator for the Total Reimbursement due in respect of all Included Services he provides;
- xxi. "Reimbursement Factor" is defined as the proportion of total journeys by concessionary passholders that are not deemed to be generated by the travel concession;
- xxii. "Revenue Reimbursement" shall be the payment due to the Participating Operator in respect of the Net Revenue Foregone as a result of participation in the Scheme (for the avoidance of doubt this excludes any payment in respect of Additional Costs);
- xxiii. "Scheme Administration Costs" are the element of Additional Costs associated with publicity, ticketing, software changes, management time and special requests for information that are related directly to the Scheme.
- xxiv. "Participating Operator" shall be construed as a transport operator providing Eligible and/or Included Services in accordance with the terms of the scheme.
- xxv. "Eligible Person" means any person who has statutory entitlement to concessionary travel in accordance with relevant legislation and any guidance issued by the Secretary of State for Transport
- xxvi. "Eligible Services" are local bus services as defined by the Travel Concessions (Eligible Services) Order 2002 as amended by the Travel Concessions (Eligible Services) (Amendment) Order 2009. and explicitly excludes:
- Services on which the majority of seats can be reserved in advance of travel (such as coaches);
  - Services that are intended to run for a period of less than 6 consecutive weeks;
- Services operated primarily for the purposes of tourism or because of the historical interest of the vehicle;
- Bus Substitution (rail replacement) services;
  - Services where the fare charged by the operator has a special amenity element.

- xxvii. "DfT Guidance" means any document and/or method statement (e.g. spreadsheet) which has been or is to be issued by the Department for Transport providing guidance on the calculation of Reimbursement and which remains appropriate for this purpose;
- xxviii. "Principal Area" is the county boundary of Wiltshire
- xxix. "Boarding Stages" are the stages defined in the ticket machines as stops where passengers board.
- xxx. "Scheme" is the Wiltshire Concessionary Travel Scheme.
- xxxi. "Passenger journey" means the act of an Eligible or Entitled Person moving from one location to another using the Eligible or Included Services

### **Requirements of Participating Operators**

2. The Coordinating Authority acts on behalf of the Travel Concession Authority. Until notice to the contrary all dealings with the Travel Concession Authority should be carried out through the offices of the Coordinating Authority or any other body (agent, consultant or contractor) nominated by the Coordinating Authority such nomination to be notified in writing.
3. Participating Operators shall enable holders of valid English National Concessionary Travel Scheme (ENCTS) Passes to make Passenger Journeys free of charge in accordance with the Scheme Definition in respect of both the Statutory Minimum Travel Concession and Discretionary Elements.
4. Pursuant to the proper administration of the Scheme and to facilitate the process of reimbursement, Participating Operators shall:
  - i. Permit (including the right to travel free of charge) officers, servants, agents and/or contractors of the Coordinating Authority or others rightfully acting on its behalf access at any time to the vehicles of the Participating Operator on which concessions are given for the purposes of:
    - a) surveying or counting or estimating the number of passengers (whether generally or of any particular description) and the fares paid by those passengers and/or;
    - b) obtaining information on other matters relating to the Passenger Journeys made by Eligible Persons and Entitled Persons which, in the opinion of the Coordinating Authority is necessary for the calculation and/or verification of reimbursement payments;
  - ii. Provide at such times as the Coordinating Authority may reasonably request, information relevant to the calculation of reimbursement as may be specified, and in the form specified, in these Arrangements for Reimbursement or as otherwise requested at the time;

- iii. Cooperate with the Coordinating Authority to establish and maintain an inventory of Boarding Stages that are deemed to be within the Principal Area of the Scheme and/or its close vicinity and to assist in the process of allocating Boarding Stages to individual Authorities in accordance with any guidance issued by the Department for Transport;
  - iv. As soon as possible, and in advance of it taking effect, notify the Coordinating Authority of any change or changes to fares on any service eligible for reimbursement;
  - v. As soon as possible, and in advance of it taking effect, notify the Coordinating Authority of any material change (additions, deletions and/or variations) to any service eligible for reimbursement, including details of any new or revised fare stages;
  - vi. Provide reasonable assistance to the Coordinating Authority in the operation and administration of the Scheme;
  - vii. Provide reasonable assistance and information to the Coordinating Authority to enable the forward planning of budget requirements to properly fund the Scheme.
5. The Coordinating Authority shall ensure that any information obtained in accordance with paragraph 4 shall be used only for the purpose of administering the Scheme and shall be confidential to the Travel Concession Authority, Coordinating Authority and/or its contractors and/or consultants employed to assist in the administration of the Scheme and/or any auditors acting on behalf of the Coordinating Authority or Travel Concession Authority.

### **Payment and Calculation of Reimbursement**

6. Participating Operators shall be reimbursed on the terms set out herein in respect of all Passenger Journeys made under the terms of the Statutory Minimum Travel Concession by holders of ENCTS Passes which commence from a Boarding Stage defined as being within the Principal Area of the Scheme. Participating Operators shall also be reimbursed on the terms set out herein in respect of all Passenger Journeys made under the terms of local Discretionary Entitlements by holders of ENCTS Passes and which commence from a Boarding Stage defined as being within the Principal Area of the Scheme.
7. The standard method of operator reimbursement will be the method used in the Reimbursement Calculator published by the Department for Transport, in line with Department for Transport guidance on operator reimbursement. Reimbursement for any period is the aggregate of the sum of Revenue Reimbursement (Net Revenue Foregone), Marginal Operating Costs, Marginal Capacity Costs, Peak Vehicle Requirement Costs and Scheme Administration Costs for the same period in respect of each service/route operated by each operator during that period.
8. The latest guidance and calculator can be found at:  
<https://www.gov.uk/government/publications/guidance-on-reimbursing-bus-operators-for-concessionary-travel> and <https://www.gov.uk/government/publications/concessionary-bus-travel-reimbursement-calculator> respectively.

## Payment and Calculation of Reimbursement

9. Payments will be made to operators of existing services on the following basis:
  - a) An amount equivalent to 95% of one twelfth of the estimated Total Reimbursement due shall be paid so that it is in the hands of the operator by the 1st day of each month or the next working day if that day falls on a weekend or public holiday.
  - b) The cumulative balance of the Total Reimbursement due at the end of each Payment Period shall be calculated as set out below (paragraph 15-17) and shall be paid so that it is in the hands of the operator by the last day of the following Payment Period or the next working day if that day falls on a weekend or public holiday.
10. Participating Operators will be notified of the amount of each payment made in accordance with 9 above and any subsequent variation to that amount.
11. Payments will be made to new operators on the following basis:
  - a) An initial payment equal to 95% of the Total Reimbursement due for the period from the commencement of operation up to and including the end of the month in which the payment is made shall be paid within 28 days of the receipt of operational data for at least 3 months from which the payment will be calculated;
  - b) After the initial payment, 95% of one twelfth of the estimated Total Reimbursement due shall be paid so that it is in the hands of the operator by the 1st day of each subsequent month or the next working day if that day falls on a weekend or public holiday.
  - c) The cumulative balance of the Total Reimbursement due at the end of each Payment Period shall be calculated as set out below (paragraph 15-17) and will be paid so that it is in the hands of the operator by the last day of the following Payment Period or the previous working day if that day falls on a weekend or public holiday.
12. The scheme reserves the right to reclaim any overpayments either by invoice or by deducting the overpaid amounts from future Reimbursement Payments. Such deduction will be advised no later than 3 months after the end of the Financial Year to which the overpayment relates and deductions from future payments will normally be made no later than 6 months after the end of the Financial Year to which the overpayment relates.
13. Participating Operators incurring a very low level of Revenue Foregone over a Financial Year may opt to be paid on the basis of a fixed cost allocation which may be agreed between the Participating Operator and the Coordinating Authority and kept under review.
14. Payments to Participating Operators falling outside the statutory provisions will be based on an agreed formula with the objective of being no more and no less generous than the terms of reimbursement in respect of local services.

## **Balancing Payments**

15. The balance of Total Reimbursement due at the end of a Payment Period shall be the difference between:
  - a) The payments already made at that time in respect of the period commencing at the beginning of the respective Financial Year less any overpayments invoiced and/or deducted and;
  - b) The Total Reimbursement due at that time in respect of the period commencing at the beginning of the respective Financial Year and calculated as set out below.
16. Participating Operators will be sent a reimbursement statement detailing each balancing payment reconciliation. This statement will show the following for the period from the start of the Financial Year to the end of the relevant Payment Period:
  - a) The sum of the payments due to the Participating Operator;
  - b) The sum of the payments so far made to the Participating Operator;
  - c) The amount of any balancing payment or reclaim.
17. Payments will only be released to Participating Operators upon receipt of a properly completed claim and the necessary data and information returns in respect of the previous Payment Period. These claims and data returns must be submitted within 2 weeks of the end of each Payment Period.

## **Operator Reimbursement**

18. The Standard Method of operator reimbursement will be the method used in the Reimbursement Calculator published by the Department for Transport, in line with Department for Transport guidance on operator reimbursement.
19. Reimbursement for any period is the aggregate of the sum of Revenue Reimbursement (Net Revenue Foregone), Marginal Operating Costs, Marginal Capacity Costs, Peak Vehicle Requirement Costs and Scheme Administration Costs for the same period in respect of each service/route operated by each Participating Operator during that period.
20. Participating Operators are required to submitted properly completed claims and the necessary data and information returns in respect of the previous Payment Period within 2 weeks of the end of each Payment Period.
21. Claims relating to Peak Vehicle Requirement Costs and Scheme Administration Costs Claims, should be submitted by the last day of the following Payment Period along with relevant supporting information and data as outlined below.

## Revenue Reimbursement

22. The Standard Method will be used to calculate the cumulative value of Net Revenue Foregone that has arisen at the end of each Payment Period for each service/route or group of services/routes operated by each Participating Operator as follows:

$$R = J \times F \times fr$$

Where: **R** is Net Revenue Foregone

**J** is the validated out-turn number of Passenger Journeys made in accordance with the Statutory and Discretionary Elements of the Scheme and starting in the Principal Area of the Scheme from the beginning of the respective Financial Year to the end of the period in question

**F** is the average Fare

**fr** is the Reimbursement Factor which takes account of Generated Travel. This factor will be determined individually for each Participating Operator.

23. The validated number of passenger journeys will be based on the number of journeys recorded by the Participating Operator commencing from a boarding stage within the Principal Area of the scheme, checked and validated as necessary by the Travel Concession Authority.
24. The Average Fare forgone will be calculated using the DfT's Reimbursement Calculator. In line with DfT Guidance, it is intended that the "Discount Factor" method will be used for all operators except where any of the following criteria are met, in which case the "Basket of Fares" approach will be used:
- Operators with cash fares only
  - Operators with only cash fares and weekly tickets
  - Operators with no cash fares
  - Operators with atypical ticket price combinations such that the daily ticket to average cash fare price ratio is greater than 5 (before or after degeneration)
  - Operators with ticket price ratios such that the Discount Factor method would lead to the proportion of daily or period tickets to cash fare ticket sales being higher than the corresponding proportion for current fare paying passengers
  - Where 60 per cent or more of an operator's concessionary passenger boardings (on services serving a TCA's area) are carried on buses where the average weekday daytime frequency (09.30 to 18.00) is one bus per hour or less
25. The Reimbursement Factor value for each individual operator will be calculated using the Department for Transport's Reimbursement Calculator. The DfT Reimbursement Calculator uses two Single Demand Curves – one for "PTE-like" areas and one for "non-PTE-like" areas. The appropriate Reimbursement Factor will be determined using the "non-PTE-like" Single Demand Curve.
26. In line with DfT guidance, paragraph 3.19-3.24, services deemed as infrequent services, community bus services or special services (where the use of the Single Demand Curve is less applicable), will be reimbursed under special arrangements outlined in table 1 below.
27. In frequent services are defined in line with DfT guidance as being a service of once a day or less.



**Table 1 - Reimbursement Factors**

Category of Service	Reimbursement Factor
Infrequent	0.7140
Special	0.8333

28. The actual value of the Reimbursement Factor used for each operator is determined by the appropriate Single Demand Curve, together with the percentage change in average commercial fares (in real terms, taking account of inflation as measured by Government Consumer Price Index (CPI) figures) on the operator's routes that serve Wiltshire between 2005-6 and 2020-21. This will be calculated by the Travel Concession Authority using the best available information, including data provided by the operator concerned. Care will be taken to use comparable data sets in calculating this change, to the extent possible.
29. Where operator-specific data on the change in average commercial fares between 2005-6 and 2020-21 is not available, the Travel Concession Authority will use either (a) a TCA-wide figure for average percentage change in commercial fares or (b) the National Bus Index 2005/6 to 2010/11.

### **Marginal Operating Costs**

30. Marginal Operating Costs will be calculated in accordance with the Department for Transport's Reimbursement Calculator. Each operator will receive Marginal Operating Costs for each generated concessionary journey.
31. Marginal Operating Costs will be calculated in two parts for each operator; the "Fixed" and "Variable" elements, using the DfT Reimbursement Calculator.
32. The "Fixed Element" of operating costs equates to £0.069 per generated concessionary journey. The "Variable Element" relates directly to the average concessionary journey length for an operator. The average journey length will be taken to be the default value in the DfT Reimbursement Calculator (3.9 miles) unless the Travel Concession Authority can determine an alternative value based on local evidence.
33. The number of generated journeys to be used in the calculation of the Marginal Operating Costs will be calculated as follows:

$$J_g = J \times (1 - fr)$$

Where:

- J<sub>g</sub> is the number of generated journeys  
J is the validated number of passenger journeys  
fr is the Reimbursement Factor which takes account of Generated Travel, expressed as a decimal fraction.

## **Marginal Capacity Costs**

34. Marginal Capacity Costs are the costs to a bus operator of necessarily providing increased capacity on a bus route to accommodate Generated Travel resulting from the concessionary travel scheme, by using the existing bus fleet more intensively through increased frequency. Marginal capacity costs payable are net of the estimated additional revenue generated from commercial journeys that arise from increased frequency. Marginal Capacity Costs will not normally be payable on contracted services where the frequency and/or capacity to be provided are set by the contracting authority, in accordance with Department for Transport Guidance.
35. It is recognised that a possible alternative response to the increase in demand from generated concessionary travel would be to increase seating capacity rather than increase frequency of service. However, the costs payable to operators making this operating choice will not exceed the net costs of increasing frequency (including revenue effects) of using existing buses, as set out below.
36. The Travel Concession Authority will adopt the Marginal Capacity Cost (MCC) calculator of the DfT Reimbursement Calculator for determining the level of Marginal Capacity Costs payable to each operator. This requires the following input parameters for each operator's network of services that serve Wiltshire:
  - Average bus speed
  - Mean vehicle occupancy
  - Mean journey length
  - Mean route length
  - Commercial journeys (including adults, young people and children) as a percentage of total journeys
  - Average commercial fare per journey
37. Where an operator can provide (in the reasonable judgement of the Travel Concession Authority) a properly evidenced full set of local inputs on all of these parameters, they will be used for calculating Marginal Capacity Costs due using the DfT MCC Calculator. Where an operator does not provide such a properly evidenced full set of local inputs on all these parameters, the set of default values contained within the DfT MCC calculator will be used for calculating Marginal Capacity Costs due to that operator.

## **Peak Vehicle Requirement Costs**

38. The Travel Concession Authority recognises that in exceptional circumstances an operator may have to operate additional vehicles in the peak period due to generated concessionary travel.
39. If an operator wishes to claim additional Peak Vehicle Requirement Costs then the operator must supply data and analysis to support such a claim.
40. If an operator wishes to submit a claim, the evidence that is required to be provided is set out in the DfT Guidance on reimbursing bus operators for concessionary travel 2020 to 2021 at paragraphs 7.61 to 7.63.

41. The calculation of peak vehicle requirement (PVR) costs due to an operator submitting a valid claim will follow the calculation process set out in the DfT Guidance on reimbursing bus operators for concessionary travel 2020 to 2021 at paragraphs 7.64 to 7.74. Settlement of claims agreed as reasonable by the Travel Concession Authority will be made without undue delay.

### **Scheme Administration Costs**

42. The Travel Concession Authority recognises that Participating Operators may be subject to administration costs for which they should be reimbursed. In line with paragraphs 7.6-7.8 of the guidance, these costs may include publicity, ticketing, software changes and management time relating to special requests for information. Regular information supplied by the operator to the TCA as part of the scheme, for example number of journeys, and costs to do with information about services, are covered as part of the marginal operating costs. Where Participating Operators believe administration costs are required above and beyond this, a request should be made to the Travel Concession Authority as soon as possible within the scheme year.

### **Claims and Data Returns**

43. Data enabling the calculation of Revenue Foregone to be made shall normally be provided by Participating Operators in electronic form extracted directly from electronic ticketing machines and those machines must be configured such that journeys made by Scheme pass holders can be separately identified. Participating Operators expected to receive Total Reimbursement totalling £50,000 or more in respect of a Financial Year must provide data in this form.
44. Operators expected to receive Total Reimbursement totalling less than £50,000 in respect of a Financial Year may provide an acceptable equivalent to electronic data.
45. Data enabling the calculation of Revenue Reimbursement and Additional Costs due shall be provided by Participating Operators through data returns on a monthly basis (unless a different frequency of data returns is agreed between the Travel Concession Authority and an operator). These data returns shall be provided within 2 weeks of the end of each period to which they relate. The Travel Concession Authority reserves the right to withhold payments of reimbursement in whole or in part in cases where Participating Operators do not submit data returns on time and/or in the required form.
46. The precise specification of the required data shall normally be a matter of agreement between each Participating Operator and the Coordinating Authority but the Coordinating Authority reserves the right to reasonably specify the content, manner, form and method by which such information has to be extracted and provided in cases where they consider it necessary to do so. The information normally required will be as follows:
- a) Details of each journey made by a scheme pass holder (route/service identifier, journey number, driver identifier, boarding stage, time, etc)
  - b) The average fare paid by fare paying passengers purchasing tickets on bus for each route/service and for each data return period (or information to enable this to be calculated)
47. In special cases (for example small commercial operators or community transport operators), Participating Operators who are unable to provide data from electronic ticket machines or its

equivalent may, subject to the prior agreement of the Coordinating Authority, have their Gross and Net Revenue Foregone estimated by means of data from sample surveys (or other sources) on their services or services of a similar type in the same area. To facilitate the process of estimation they may be required to provide details of gross commercial revenues.

48. The frequency of data returns shall be a matter to be determined between each Participating Operator and the Coordinating Authority but such returns shall be no less frequent than quarterly and shall be provided within 2 weeks of the end of each period to which they relate. The Coordinating Authority reserves the right to withhold payments of reimbursement in whole or in part in cases where Participating Operators do not submit data returns on time and/or in the required form.

### **Notice of Withdrawal from Scheme**

49. In the event that a Participating Operator wishes to withdraw his participation in respect of the Discretionary Elements of the Scheme he must give at least 42 days notice in writing to the Coordinating Authority.

### **Right of Appeal**

50. Any Operator has a right of appeal to the Secretary of State against the terms of reimbursement of the Scheme under the Transport Acts 1985 and 2000 or against participation in any discretionary element of the Scheme under the Transport Act 1985 on the grounds that:-
  - a) There are special reasons why their company's participation in the scheme in respect of any of the services to which the notice applies would be inappropriate (under both the 2000 Act and the 1985 Act); or
  - b) Any provision of the scheme or of any of the scheme arrangements are inappropriate for application in relation to any operators who are not voluntarily participating in the scheme (1985 Act only).

### **Alternative Dispute Resolution (ADR)**

51. The Participating Operator and the Coordinating Authority shall attempt to resolve any dispute in connection with the application of these Arrangements for Reimbursement through negotiations between the parties. If the dispute is not resolved by negotiations between the parties either party may seek that the dispute is resolved through an agreed Alternative Dispute Resolution (ADR) procedure within 12 months of the year end to which these Arrangements for Reimbursement relate. The Travel Concession Authority's preferred procedure would be Mediation.
52. Unresolved disputes over which Alternative Dispute Resolution (ADR) may be sought shall be:
  - a) Disputes over the calculation of reimbursement payments;
  - b) The determination by the Coordinating Authority of a Count Adjustment Factor and/or Fares Discount Factor the value of which a Participating Operator has reason to dispute;

c) The allocation of a service to a particular service category.

53. For the avoidance of doubt any matter referred to ADR must be supported by detailed evidence endorsed by appropriate technical advisors.
54. The matter of costs relating to the ADR procedure shall be dealt with as part of the process of ADR.
55. ADR shall be without prejudice to the rights of Participating Operators under Part V of the Travel Concession Schemes Regulations 1986 and/or Section 150(3) of the Transport Act 2000 (as amended) and/or any other relevant legislation and/or regulations and does not affect any other legal rights that the parties might have of resolving any dispute arising from these Arrangements for Reimbursement.

## APPENDIX A

### Useful Links

1. DfT Concessionary travel for older and disabled people: guidance on reimbursing bus operators (England)- <https://www.gov.uk/government/publications/guidance-on-reimbursing-bus-operators-for-concessionary-travel>
2. DfT Concessionary bus travel reimbursement calculator - <https://www.gov.uk/government/publications/concessionary-bus-travel-reimbursement-calculator>
3. Research into the reimbursement of concessionary travel - <http://webarchive.nationalarchives.gov.uk/20120606205927/http://www.dft.gov.uk/publications/research-into-the-reimbursement-of-concessionary-fares/>