

**FREEDOM PASS – BOROUGH HANDBOOK
2nd EDITION – JANUARY 2013**

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FREEDOM PASS: BOROUGH HANDBOOK

Section A: Overview of scheme

1. The Freedom Pass scheme provides free travel to older and eligible disabled London residents on almost all London's public transport. It is the most extensive concessionary fares scheme in the country, in terms of scope, benefits offered and quality of transport provided.
2. The Freedom Pass gives free travel 24 hours a day to eligible residents on all Transport for London (TfL) bus, rail, light rail and tram services (regardless of their location) and some National Rail services in Greater London and after 9.30am on almost all the remainder of National Rail in Greater London and independently operated bus services in Greater London (appendix C gives details of National Rail services). A half fare concession is provided on TfL river services and the cable car. The Freedom Pass is largely funded by boroughs with grant support from Government. TfL fund the concession for older people in the weekday morning peak on TfL services (between 04:30 and 09:00) and this accounts for around 5% of the cost of the concession overall. TfL also fund the new 60+ pass which provides travel concessions in London for people over 60 who are not yet eligible for the Freedom Pass.
3. Freedom Pass is managed on behalf of London boroughs by London Councils under the terms of section 244 of the Greater London Authority Act 1999 and the Transport and Environment Committee agreement. This includes card production and administration, database and reimbursement of transport operators.

Section B: Legal basis of scheme

4. Freedom Pass is governed by the general legislation on concessionary fares in England (Transport Act 2000, Concessionary Bus Travel Act 2007) as well as specific London provisions (contained in the Greater London Authority Act 1999 and the Transport Act 2000).

Requirement on Travel Concession Authorities to offer concessions

5. Under the general legislation, each borough is a travel concession authority (TCA) but by virtue of the GLA Act and the TEC agreement, the scheme in London is operated as a single scheme, accountable to a joint committee (London Councils TEC) for the purposes of the administration of the scheme, including issuing passes and negotiation for reimbursing transport operators. The unanimous agreement of all boroughs is required to agree to any change or for any borough to leave this arrangement.
6. TCAs are obliged to offer free bus travel (outside the morning peak) and reimburse operators for the cost of this on the principle that the operator is neither better nor worse off as a result of the scheme. Statutorily, reimbursement for the cost of each journey rests with the authority where the journey starts, although, as a result of the specific arrangements for London, London is treated as a single entity, so the costs are calculated at a London level and then apportioned to boroughs. For bus routes which cross the Greater London boundary, journeys which start in London are paid for by London boroughs whilst journeys which start outside London are paid by the TCA where the journey starts. Any bus journey by a London pass holder which is entirely outside London is paid for by the TCA where the journey starts.
7. Specific legislation for London adds important conditions on:
 - the scope and consistency of the scheme throughout London; and
 - a reserve scheme where boroughs do not agree.
8. On scope and consistency, the London TCAs are obliged to provide travel concessions for all London passholders on all services operated or managed by TfL¹ (including a free concession on buses) outside of the weekday morning peak. This means there is no requirement for a concession 04.30 – 09.00 Monday to Fridays. Since April 2008 there has also been a requirement for a free concession for all English concessionary passholders on TfL buses in London outside of the weekday morning peak.
9. While the requirement is for free travel (outside the weekday morning peak) on buses, there is no specific requirement for the type of concession offered on other modes (rail, tram, guided vehicles or boat services and ferries) the same concession must be offered on all services within each mode, though they can vary between modes. That is, for example, there must be the same concession – free or reduced fare travel – on all rail services (DLR, Underground and Overground) operated by TfL. A different type of concession can be offered on boat and ferry services but, again, this must be consistent across all boat and ferry services.

10. London Councils is required to agree a scheme with TfL by 31 December every year. Failure to agree a scheme by 31 December for the following financial year would result in the statutory free reserve scheme being imposed. The reserve scheme is set out in Schedule 16 of the 1999 Act and continues to provide free travel for pass holders on TfL services. Under this TfL would determine the cost and how this was apportioned to boroughs. The reserve scheme has never been invoked.
11. The concession on National Rail services (apart from the London Overground) is technically a discretionary scheme and so is not subject to the reserve scheme.
12. There are also a few local bus services in Greater London which are not under the control of TfL, where since April 2008 a free concession has had to be offered for all English passholders (including London passholders) from 09.30 to 23.00 Monday to Friday and any time at weekends and public holidays. These operate under London Service (LSP) permits. There are around 60 LSP operators, but certain types of routes have been excluded by the Government (e.g. long distance services with stops more than 15 miles apart, tourist buses and special events services). In practice most of the money (around £2m in 2013/14) goes to just 13 operators.

Eligibility for a pass

13. All passholders must have their sole or principal residence in Greater London. If a passholder ceases to have their sole or principal residence in Greater London then they are no longer entitled to a Freedom Pass.
14. For older people, the eligible age is set by national legislation as being the age at which a woman would get the state pension. This was achieved by secondary legislation which created an automatic link to the pension age (The Travel Concessions (Eligibility)(England) Order 2010 – SI2010/459). At the time this order was made the pension age for women was moving to 65 in 2020 but the Pensions Act 2011 changed this to 66.
15. For disabled people, the Government has set 7 categories of disability. For London authorities, these are set out in section 240(5) of the Greater London Authority Act 1999, as amended by section 151 of the Transport Act 2000. The Department for Transport has issued guidance in February 2008 – see <http://webarchive.nationalarchives.gov.uk/20110504042334/http://www.dft.gov.uk/pgr/regional/buses/concessionary/informationlocalauthorities/guidancedisabled/ancetolocalauthoritieson3561.pdf>
16. Some boroughs may choose to offer the concession to disabled people outside the statutory categories. This can be done using powers in section 29 of the National Assistance Act 1948 and section 2 of the Local Government Act 2000. Boroughs should set a policy with criteria for the issue of such passes. These discretionary passes are only valid for use in Greater London.

Section C: The annual settlement and apportionment to boroughs

Negotiations with transport operators

17. There are four elements to the reimbursement:

- Transport for London (TfL) settlement
- Association of Train Operating Companies (ATOC) settlement
- London Service Permit (LSP) routes reimbursement scheme
- Survey and reissue costs (which pays for the card issuing and database)

18. The TfL settlement is negotiated annually using a model developed by TfL and agreed with London Councils. This seeks to calculate the level of compensation TfL should receive for carrying passholders free. This compensation has two elements. First, and most important, is the revenue foregone. This is the revenue which, if the concessionary scheme did not exist, TfL would collect from pass holders. Each mode (bus, underground, DLR, tram and London Overground) is calculated separately. The fare foregone is based on a basket of different fares taking account of different types of ticket (travelcards, pay-as-you-go and single fares) that are available. Second is the additional operating cost produced by the additional travel generated by the scheme. This is currently applied only to buses.

19. The model uses a series of base assumptions on inflation (retail price index - RPI), fares and journey volumes. The journey volumes are established through comprehensive surveys and pass reader and gate data and are averaged over two years to smooth out any sudden changes. The 2013/14 settlement used journey volumes related to 2010/11 and 2011/12. The detail of the settlement is brought together each year by TfL in a document called "Notes of Settlement".

20. The morning peak entitlement for older people is paid for by TfL and the boroughs do not contribute to the cost.

21. The 2013/14 TfL settlement is £309,415,000, of which £231,191,000 is for buses, £68,010,000 is for Underground, £3,974,000 is for trams, £2,624,000 is for DLR and £3,616,000 is for London Overground.

22. The ATOC settlement is negotiated separately and although it is based on revenue foregone, the current settlement is a negotiated figure. 2013/14 is the third year of a four year deal with ATOC, costing £19,950,000 in 2013/14.

23. The legislation which applies to reimbursement for LSP operators is the same as that which applies to bus operators outside London under the Transport Act 2000, as amended. The key difference from TfL reimbursement is that operators are paid in arrears on the basis of claims submitted rather than on a fixed price settlement. London Councils must publish a draft scheme setting out the basis for reimbursement by 1 December each year for the following financial year and operators can appeal to the Secretary of State if they are unhappy with the proposal. The legislation does not allow for the reimbursement scheme to be cash limited and so it is entirely demand led.

24. In summary the 2013/14 settlement is as follows:

	£000	£000
TfL		309,415
Of which		
TfL Bus	231,191	
Underground	68,010	
Tram	3,974	
DLR	2,624	
London Overground	3,616	
ATOC		19,950
Non TfL bus (LSP services)(estimate)		2,000
Survey and reissue costs		794
2015 reissue provision		400
TOTAL SETTLEMENT		332,559
Prior year adjustment for Veterans		-668
SETTLEMENT TO BE APPORTIONED		331,891

25. The cost of card production and database management, together with the costs of any travel survey work, is met from the Survey and Reissue budget line. The cost of processing applications by the Post Office is met by individual boroughs.

26. In 2013/14 the amount to be apportioned is reduced by £668,000 to correct an error by TfL in 2011/12 and 2012/13 in relation to veterans passes which has been wrongly charged to boroughs.

27. The 2013/14 settlement also includes a contribution to a specific reserve to help pay for the 2015 pass reissue

Apportionment of costs to boroughs

28. While costs were originally apportioned on the basis of pass numbers, the introduction of smart card technology enabled actual usage to be determined. Following arbitration in October 2008, apportionment is now based on the actual usage of each pass where this data is available. For 2013/14, this covers buses, underground, DLR and trams. National Rail and London Overground journeys are now recorded on Oyster technology which will enable usage data to be used for apportionment from 2014/15 onwards. However TEC agreed on 13 December 2012 that this change would be phased in over three years so that the 2014/15 settlement would apportion National Rail and London Overground 40% by usage and 60% by the current method. 2015/16 would be apportioned 70% new method and 30% current and 2016/17 onwards would be apportioned 100% by the new method.

29. Currently the areas of the settlement where there is no usage data uses an apportionment based on a Department for Transport set of assumptions related to how the former special grant fed into the base formula grant in 2011/12

The annual cycle

30. Annex A provides an overview of the annual cycle so far as London councils is concerned.

Section D: practical arrangements

Pass application process

31. Older people (above the statutory retirement age for women) and those disabled people who meet the statutory criteria and, in both cases, who have their sole or main residence in London, have an entitlement to a Freedom Pass which cannot be taken away by any decision of a council. Councils have the discretion to award a 'London only' Freedom Pass (not part of the English national concession and not valid on buses outside London) to other groups though this is usually confined to small numbers of disabled people, often with mental health problems. London Councils issues passes to eligible people on behalf of all London TCAs.
32. Older people qualify by virtue of their age. Until 5 April 2010 this was 60 but, following statutory changes, the eligible age is moving gradually to 66. Under the latest change, the Pension Act 2011, those born after 6 October 1954 will not get their pass until they are 66. The Freedom Pass website has a calculator which works out the date on which a person will be eligible. (see Annex B for list of dates)
33. The preferred method for issuing older persons' passes, used in all but three boroughs, is via the Post Office. Applications for older person's passes are processed by any London Post Office using a form which is available at the Post Office or downloadable from the Freedom Pass website. Barking & Dagenham, Camden and Sutton manage their own applications.
34. Disabled people are assessed by their home borough. If the applicant meets one of 7 definitions of disability set by Government, they are entitled to a statutory pass, which is valid on buses outside London. Some boroughs choose to offer passes to disabled people who do not qualify for a statutory pass. This is a matter of local discretion and these passes are not valid outside London.
35. In all but four boroughs, the borough issues eligible applicants with a letter of authorisation which then acts as an application form at the Post Office. Barking & Dagenham, Camden, Kensington & Chelsea and Sutton manage their own applications.
36. The Post Office (or borough) process the application form or letter of authorisation and enter the data from the form to be passed electronically to the contractor for card production. The form with the photograph is sent by mail to the contractor who scans it and marries this up with the previously sent data.

Card Production and central database

37. The introduction of the English National Concessionary Travel Scheme (ENCTS) in 2008 allowed free off peak travel on local buses in England. This required the creation of a standardised national travel concessionary pass for older and eligible disabled people on which the photograph of the holder was printed. This design is a statutory requirement.
38. ENCTS passes must also have national ITSO smartcard compatibility. ITSO is not compatible with TfL's Oyster system and so the London passes have dual capability.

39. A different design is used for discretionary passes, as these are not valid outside London. These passes are encoded with Oyster but not ITSO.
40. The requirement for the passholder's photograph to be printed on the pass means it is not possible to issue the passes over the counter. London Councils employs a contractor to process application forms and photographs, produce and despatch passes. The contractor also manages a Londonwide database of passes. This database is segmented so that each borough can see its own members. London Councils can see the whole database.
41. The database provides for easy management of lost, stolen or faulty passes. Where a pass is lost, stolen or reported faulty, a replacement pass can be ordered immediately and will reach the holder within about 5 days. The original pass is cancelled and is placed on a "hot list" both with ITSO and Oyster. The pass is shown as 'invalid' on any reader if it continues to be used. There is a £10 charge for lost and damaged passes.
42. Since 2010, passes have a 5 year life, with passes issued in that year valid until 2015 and in 2011 passes started to be issued with an expiry date of 31 March 2016. A planned move to a 2017 expiry date was put on hold because TfL could not guarantee the continued availability of the Oyster system beyond 2015 and was unable to give a specification for a card which will work after then. However, in the absence of a clear position on the future of Oyster, it is now intended to move to a 31 March 2018 expiry date during 2013.
43. Following is a summary of the card volumes (cards issued less hotlisted passes):

	Following 2010 reissue (as at 31 May 2010)	As at 31 May 2011	As at 31 May 2012
Older Person's	1.027m	1.071m	1.138m
Statutory Disabled	0.117m	0.137m	0.149m
Discretionary Disabled	0.008m	0.008m	0.008m
Overall total	1.152m	1.216m	1.295m

44. As indicated above the bulk of passes expire in March 2015 and there will need to be a major reissue exercise then. However, as all the information is now held on a single database, it may be possible to reissue a significant number of passes by a postal process rather than require attendance at the Post Office as has happened in previous re-issues.

Review of continued eligibility

45. Prior to 2010 passes were re-issued every 2 years and so the database was updated at that point. Now that we have passes valid for up to 5 years, it was concluded that some checks on continued eligibility should be undertaken during 2012/13 around the mid point of validity for the 2010 issue passes.
46. London Councils is using a commercial data matching resource to identify those passholders who may have died or moved away. This is focussed on older pass

holders as boroughs will usually have some contact with disabled pass holders and would keep those records up to date.

Interface with Mayor's 60+ scheme

47. The Mayor and TfL are funding a separate scheme which provides for free travel in London for people who are over 60 but who are not yet old enough for a Freedom Pass. The pass is branded distinctively as an Oyster card and is set to expire 14 days after the date of eligibility for the Freedom Pass.

48. London Councils has entered into a data sharing protocol with TfL to provide that:

- information about disabled Freedom Pass holders who are over 60 is passed from London Councils to TfL to ensure they do not also get a 60+ pass
- Information about 60+ passholders (who have not opted out of data sharing) is passed from TfL to London Councils shortly before the 60+ pass expires to enable London Councils to write to the person and confirm their eligibility for a Freedom Pass. This will allow a significant proportion of passes to newly eligible people to be issued without the person needing to apply at the Post Office.

Section E: Borough Responsibilities

49. Although London Councils is responsible for much of the operation of the Freedom Pass scheme, boroughs still have a number of responsibilities.

Application Process

Disabled applicants

50. All boroughs are responsible for:

- Setting a policy (and eligibility criteria) with regard to discretionary passes if they are to be issued
- Assessing an individual's eligibility for a disabled pass under national criteria or under local criteria (if applicable)
- Cancelling passes where they become aware that the holder has died or moved out of their borough

51. All boroughs (except Barking and Dagenham, Camden, Kensington & Chelsea and Sutton) are responsible for:

- Producing a letter of authorisation on paper supplied by London Councils for qualifying applicants

52. Barking and Dagenham, Camden, Kensington & Chelsea and Sutton are responsible for processing applications from their residents, checking proof of residency and age and likeness of photograph. These boroughs then input the data and scanned photographs into the CMS for card production.

Older applicants

53. The Post Office processes applications (including checking proof of residency and age and the likeness of the photograph) for residents of all boroughs except Barking and Dagenham, Camden and Sutton and so no direct action is needed by the borough.

54. Barking and Dagenham, Camden and Sutton are responsible for processing applications from their residents, checking proof of residency and age and likeness of photograph. These boroughs then input the data and scanned photographs into the CMS for card production.

Lost, stolen, damaged, faulty passes

55. A £10 charge for replacing lost, or damaged passes was introduced on 1 November 2012. No charge is made to replace a stolen pass if a crime reference number is provided. Replacements for faulty passes are charged at £10 but this is refunded if the card is returned for testing and it is found to be faulty as opposed to damaged.

56. London Councils administer charging through its contractor who can accept credit and debit card payments as well as cheques and postal orders. Cash is accepted at London Councils' offices in Southwark Street. Income is offset against expenditure on administration.

57. Boroughs should refer people who contact them regarding lost, stolen, damaged and faulty passes to the contractor, but if boroughs do take payments London Councils will recover the income as part of the annual settlement. As almost all the costs of reissue are met by London Councils. If this were not done then this would result in an unfair subsidy to the borough taking the payment.
58. If a person loses three passes in a rolling 12 month period, they are referred to the borough and the borough needs to authorise the replacement.

Good Housekeeping

59. All boroughs should ensure that information about pass holders who die or move out of their borough is utilised to its fullest effect:
- For deceased persons, boroughs should cancel the pass on CMS.
 - For people moving out of London, boroughs should cancel the pass on CMS.
 - For people moving to another London borough, these cases should be referred to London Councils who will reallocate the pass to the relevant borough when the passholder has provided proof of the new address. This avoids the need to cancel and then reissue passes to people moving within London.
60. Apportionment is based on usage data from all passes valid on the 31st May in any year. Passes cancelled before 31 May in each year will not be included in the pass count used to get usage data. Thus the 31 May 2012 pass count was used to get 2011/12 usage data which is then used for the 2013/14 apportionment. Note as two years' usage data is used it takes two settlements for the full effect of the cancelled pass to take effect in the apportionment.
61. It is therefore in the boroughs' interest to use any information they have on people who have died or moved away to cancel passes as soon as they have it. However as this affects the proportions not the total cost of the scheme, it is possible that if most boroughs reduced their pass counts by a similar amount, then there would be little effect on each borough's share of the total.

Paying for the scheme

62. The December TEC meeting agrees the settlement and the apportionment, together with the quarterly payment dates (in June, September, December and March) for the following financial year. This is then confirmed in a circular to Chief Executives usually sent just before Christmas. Boroughs are responsible for ensuring that payments are made according to the schedule. Late payments incur a financial penalty.
63. Borough payments consist of three (or in three boroughs, two) elements:
- Scheme quarterly payment to TfL for the TfL settlement
 - Scheme quarterly payment to London Councils (for the non TfL elements of the scheme and for survey and reissue costs and for annual administration charge)
 - Post Office for their application processing costs (except for Barking & Dagenham, Camden and Sutton)
64. The first of these is invoiced by TfL, the second by London Councils and the third by the Post Office.

Annex A: Concessionary fares annual cycle

1 April	New financial year starts
April/May	Agree Notes of Settlement for current year with TfL
April/May	Chase outstanding claims from LSP operators for previous year
May	Start discussions on next year's settlement with TfL/ATOC
31 May	Live card "stocktake". (Date used to determine live passes for which usage data will be requested from TfL)
Early June	First quarter payments (Boroughs pay TfL and London Councils amounts set by TEC. London Councils pays ATOC)
June	Provide TfL with live card information for them to run report on usage
Early September	Second quarter payments (Boroughs pay TfL and London Councils amounts set by TEC. London Councils pays ATOC)
September	TfL provide initial figures for next year's settlement and usage data; boroughs advised
Early November	TfL provide final figures for next year's settlement
Mid November	Seek TEC agreement to draft LSP scheme (goes to November TEC Executive)
Late November	Annual settlement and apportionment TEC report finalised and cleared
1 December	Publish draft scheme for reimbursement for LSP services for next year
Early December	Third quarter payments (Boroughs pay TfL and London Councils amounts set by TEC. London Councils pays ATOC)
Mid December	TEC meeting to agree next year's settlement and apportionment
Mid December	Following decision of TEC, ensure quarterly payment information provided to Finance for inclusion in Chief Executive's circular on borough subscriptions
31 December	Deadline by which contract with TfL must be signed otherwise Reserve Scheme kicks in
Early March	Fourth quarter payments (Boroughs pay TfL and London Councils amounts set by TEC. London Councils pays ATOC)
Mid March	Finalise estimate of likely claims under LSP scheme and notify Finance
31 March	Publish LSP scheme for next financial year

There will also be a regular data sharing between TfL and London Councils in relation to 60+ passholders. Information on disabled over 60s will be passed to TfL from time to time. Details of expiring 60+ passes will be passed to London Councils up a to month before the date of eligibility for a Freedom pass (as shown in the table at appendix B)

Annex B: Age eligibility changes (effective from January 2012)

Year of Birth	Date of Birth		Date of eligibility	For Application Form Earliest date you can apply (14 days prior to eligibility)	
1951	06 February 1951	to	05 March 1951	06 January 2012	23 December 2011
	06 March 1951	to	05 April 1951	06 March 2012	21 February 2012
	06 April 1951	to	05 May 1951	06 May 2012	22 April 2012
	06 May 1951	to	05 June 1951	06 July 2012	22 June 2012
	06 June 1951	to	05 July 1951	06 September 2012	23 August 2012
	06 July 1951	to	05 August 1951	06 November 2012	23 October 2012
	06 August 1951	to	05 September 1951	06 January 2013	23 December 2012
	06 September 1951	to	05 October 1951	06 March 2013	20 February 2013
	06 October 1951	to	05 November 1951	06 May 2013	22 April 2013
1952	06 November 1951	to	05 December 1951	06 July 2013	21 June 2013
	06 December 1951	to	05 January 1952	06 September 2013	23 August 2013
	06 January 1952	to	05 February 1952	06 November 2013	23 October 2013
	06 February 1952	to	05 March 1952	06 January 2014	23 December 2013
	06 March 1952	to	05 April 1952	06 March 2014	20 February 2014
	06 April 1952	to	05 May 1952	06 May 2014	22 April 2014
	06 May 1952	to	05 June 1952	06 July 2014	20 June 2014
	06 June 1952	to	05 July 1952	06 September 2014	22 August 2014
	06 July 1952	to	05 August 1952	06 November 2014	23 October 2014
1953	06 August 1952	to	05 September 1952	06 January 2015	23 December 2014
	06 September 1952	to	05 October 1952	06 March 2015	20 February 2015
	06 October 1952	to	05 November 1952	06 May 2015	22 April 2015
	06 November 1952	to	05 December 1952	06 July 2015	22 June 2015
	06 December 1952	to	05 January 1953	06 September 2015	21 August 2015
	06 January 1953	to	05 February 1953	06 November 2015	23 October 2015
	06 February 1953	to	05 March 1953	06 January 2016	23 December 2015
	06 March 1953	to	05 April 1953	06 March 2016	21 February 2016
	06 April 1953	to	05 May 1953	06 July 2016	22 June 2016
1954	06 May 1953	to	05 June 1953	06 November 2016	23 October 2016
	06 June 1953	to	05 July 1953	06 March 2017	20 February 2017
	06 July 1953	to	05 August 1953	06 July 2017	22 June 2017
	06 August 1953	to	05 September 1953	06 November 2017	23 October 2017
	06 September 1953	to	05 October 1953	06 March 2018	20 February 2018
	06 October 1953	to	05 November 1953	06 July 2018	22 June 2018
	06 November 1953	to	05 December 1953	06 November 2018	23 October 2018
	06 December 1953	to	05 January 1954	06 March 2019	20 February 2019
	06 January 1954	to	05 February 1954	06 May 2019	22 April 2019
1954	06 February 1954	to	05 March 1954	06 July 2019	22 June 2019
	06 March 1954	to	05 April 1954	06 September 2019	23 August 2019
	06 April 1954	to	05 May 1954	06 November 2019	23 October 2019
	06 May 1954	to	05 June 1954	06 January 2020	23 December 2019
	06 June 1954	to	05 July 1954	06 March 2020	21 February 2020
	06 July 1954	to	05 August 1954	06 May 2020	22 April 2020
	06 August 1954	to	05 September 1954	06 July 2020	22 June 2020
	06 September 1954	to	05 October 1954	06 September 2020	23 August 2020
		06 October 1954		Your 66th birthday	14 days prior to your 66th birthday

Appendix C: Concessions on National Rail Services

Free travel at all times

- London Overground : all services
- Southern: between Clapham Junction and Harrow & Wealdstone (disabled persons only)
- London Midland: between Harrow & Wealdstone and Queen's Park
- C2C: between Upminster and Fenchurch Street
- Anglia: between Stratford and Liverpool Street
- Thameslink: between Finsbury Park and Kings Cross and Moorgate; between West Hampstead and London Bridge/Elephant & Castle
- Chiltern Railways: between Marylebone and Amersham; between South Ruislip and West Ruislip

Free travel after 9.00am Mondays to Fridays and all day at weekends and on public holidays

- Southern: between Clapham Junction and Harrow & Wealdstone (older persons' passes only)

Free travel after 9.30am Mondays to Fridays and all day at weekends and on public holidays

- C2C: between Barking and Rainham
- Anglia: between Liverpool Street/Stratford and Harold Wood; between Romford and Upminster; between Liverpool Street and Enfield Town, Turkey Street, Enfield Lock and Chingford
- Thameslink: between Finsbury Park and Hadley Wood and Crews Hill; between West Hampstead and Elstree & Borehamwood; between London bridge and East Croydon; between Elephant & Castle and Sutton (via Wimbledon or Mitcham Junction)
- Chiltern: between Marylebone/Paddington and South Ruslip
- Great Western: between Paddington and Greenford/West Drayton
- Heathrow Connect: between Paddington and West Drayton
- South West Trains: between Waterloo and Feltham (via Richmond or Hounslow), Hampton (via Richmond or Kingston), Hampton Court, Surbiton, Chessington South and Ewell West
- Southern: between Victoria and London Bridge and Ewell East, Epsom Downs, Tattenham Corner, Coulsdon South, Caterham, Upper Warlingham and Beckenham Junction (all routes)
- South Eastern: between Victoria, Blackfriars, Charing Cross and Cannon Street and Hayes, Knockholt, Swanley, Dartford and Bromley North (all routes)

Freedom Pass is not valid at all on:

- East Coast
- East Midlands Trains
- First Hull Trains
- Grand Central
- Virgin West Coast
- London Midland (beyond Harrow & Wealdstone)
- Heathrow Express
- South Eastern High Speed