

# Health and Social Care Scrutiny Commission

Wednesday 15 November 2023  
7.00 pm  
160, Tooley Street, SE1 2QH

## Membership

Councillor Suzanne Abachor (Chair)  
Councillor Maria Linforth-Hall (Vice-Chair)  
Councillor Sam Dalton  
Councillor Sunil Chopra  
Councillor Esme Dobson  
Councillor Sandra Rhule  
Councillor Nick Johnson

## Reserves

Councillor Naima Ali  
Councillor Victor Chamberlain  
Councillor Sabina Emmanuel  
Councillor David Watson  
Councillor Kath Whittam  
Councillor Charlie Smith

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## INFORMATION FOR MEMBERS OF THE PUBLIC

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**Access to information** You have the right to request to inspect copies of minutes and reports on this agenda as well as the background documents used in the preparation of these reports.

**Babysitting/Carers allowances** If you are a resident of the borough and have paid someone to look after your children, an elderly dependant or a dependant with disabilities so that you could attend this meeting, you may claim an allowance from the council. Please collect a claim form at the meeting.

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### Contact

Julie Timbrell on 020 7525 0514 or email: [Julie.Timbrell@southwark.gov.uk](mailto:Julie.Timbrell@southwark.gov.uk)

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Members of the committee are summoned to attend this meeting

**Althea Loderick**

Chief Executive

Date: 7 November 2023



# Health and Social Care Scrutiny Commission

Wednesday 15 November 2023  
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160, Tooley Street, SE1 2QH

## Order of Business

Item No.	Title	Page No.
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### **PART A - OPEN BUSINESS**

**1. APOLOGIES**

To receive any apologies for absence.

**2. NOTIFICATION OF ANY ITEMS OF BUSINESS WHICH THE CHAIR DEEMS URGENT**

In special circumstances, an item of business may be added to an agenda within five clear working days of the meeting.

**3. DISCLOSURE OF INTERESTS AND DISPENSATIONS**

Members to declare any interests and dispensations in respect of any item of business to be considered at this meeting.

**4. MINUTES**

To approve as a correct record the minutes of the open section of the meeting on 19 September 2023. The minutes are to follow.

**5. REVIEW: ACCESS TO TOILETS - LOOS FOR SOUTHWARK**

1 - 2

A briefing is enclosed from Loos for Southwark – a group of local residents supported by Age UK London. Local residents will be attending to present.

Item No.	Title	Page No.
6.	<b>REVIEW: ACCESS TO TOILETS - AGE UK LONDON BRIEFING ON ADDRESSING ANTI-SOCIAL BEHAVIOUR</b>	3 - 4
	John McGeachy, Age UK London, has provided the enclosed briefing following up on questions raised at the last meeting around anti-social behaviour and the provision of public toilets.	
7.	<b>REVIEW: ACCESS TO TOILETS - OFFICER REPORTS AND PRESENTATIONS</b>	5 - 18
	The following briefings are enclosed:	
	<ul style="list-style-type: none"> <li>• Changing Places</li> <li>• Access to Toilet facilities – Business engagement</li> </ul>	
	They will be presented by following officers:	
	<ul style="list-style-type: none"> <li>• Chloe Harvey, Thrive-to-25 Programme Manager, Children and Adult Services</li> <li>• Matt Little, Principal Strategy Officer, Local Economy Team</li> </ul>	
8.	<b>INTERVIEW WITH THE CABINET MEMBER FOR HEALTH AND WELLBEING</b>	19 - 20
	Councillor Evelyn Akoto, Cabinet Member for Health and Wellbeing, portfolio is enclosed.	
9.	<b>BLUE BADGE APPLICATION PROCESS AND CRITERIA FOR AWARD</b>	21 - 26
	A briefing on the Blue Badge process and criteria for award is enclosed.	
	The following officers will attend to present and take questions:	
	<ul style="list-style-type: none"> <li>• Shaidi Khan, Accessible Transport Manager, Customer and Exchequer Services</li> <li>• Michelle Peake, Head of Specialist Services, Housing and Modernisation.</li> </ul>	

**10. MUSCULOSKELETAL (MSK) COMMISSIONING CHANGE**

A 'trigger template' is enclosed from lead commissioners from the South East London Integrated Care Board, setting out their intention to decommissioning the Southwark community Musculoskeletal (MSK) service.

This is a standalone service based in primary care that is not part of the Southwark Integrated Musculoskeletal Community Services at GSTT or King's Denmark Hill.

Commissioners will attend to present and take questions.

**11. WORK PROGRAMME**

**DISCUSSION OF ANY OTHER OPEN ITEMS AS NOTIFIED AT THE START OF THE MEETING.**

**BLANK**

Date: 7 November 2023

**EXCLUSION OF PRESS AND PUBLIC**

The following motion should be moved, seconded and approved if the sub-committee wishes to exclude the press and public to deal with reports revealing exempt information:

“That the public be excluded from the meeting for the following items of business on the grounds that they involve the likely disclosure of exempt information as defined in paragraphs 1-7, Access to Information Procedure rules of the Constitution.”

## Loos for Southwark

What older Southwark residents would like to see to improve public toilet provision in the borough

### Loos for Southwark

#### Background

Loos for Southwark are a campaign group of Southwark residents brought together and supported by Age UK London as part of the London Loos campaign. 'Age UK London campaign' to make London more age-friendly, they work with, but are separate from 'Age UK Lewisham and Southwark').

**The residents are calling for improvements to the provision of public toilets in Southwark to reduce social isolation and make the borough more inclusive for residents and visitors.** The group believe improving public toilet provision benefits all residents. Some groups of people, such as those with specific health conditions, some older and disabled people, families with young children et.al., benefit even more than others.

The group consists of nine residents, all over the age of 60, from across the borough.

#### Improving public toilet provision in Southwark

The following are a list of improvements that members of the group would like to see.

- An assessment of the current state of public toilet provision in the borough. What are the geographical gaps (Southwark's 'loo deserts')? Is there provision in the locations where it is most needed (town centre provision and other places of high footfall)?
- More investment to improve the maintenance and cleanliness of public toilets.
- Exploration into whether public toilets that have been closed, could be reopened.
- Less restrictive opening hours. Where public toilets exist, the limited opening hours are restrictive. There is particular concern about availability in the evenings.
- Meaningful listening to residents about the situation. This should include proactive outreach to community organisations, especially groups representing older and disabled residents. Engagement must not be 'online only'.
- Clarification about the current status of the Community Toilet Scheme in Southwark.
- Engage local businesses to open their toilets as part of an improved Community Toilet Scheme.
- Community Toilet Schemes should receive regular support and monitoring.
- Members should have a sticker they can display in windows.
- Improve street signage to toilets.
- Use new and existing communication channels to increase awareness among residents about the location of public toilets in Southwark.
- There should be hard-copy materials available in a range of accessible formats.
- All town centres in the borough to have good provision of public toilets.
- Increase the number of toilets for disabled users, ensuring that these adhere to 'M' design standards.
- Public toilet provision should be included and understood as a public health responsibility.
- Stave Hill Ecological Park should have public toilets.

## Loos for Southwark

What older Southwark residents would like to see to improve public toilet provision in the borough

### Priorities for action

*The Loos for Southwark campaign group call on the London Borough of Southwark to:*

- **Develop, publish, implement, and monitor a Public Toilet Strategy. This should be based on a needs assessment and meaningful engagement with residents. The Strategy could include or be separate from an action plan that is monitored and scrutinised.**
  - **Improve public information about provision (signs, maps, awareness raising, hard copy materials, et.al.)**
  - **Improve provision in parks so that all reasonable sized parks had toilets.**
  - **Identify a Councillor as a Toilet Champion for Southwark,**
  - **Improve provision of accessible public toilets.**
  - **Meaningful resident participation in the current review of public toilet provision.**
- 

We recommend this document is considered alongside the findings of the report, '[Public toilets in London: The views of older Londoners](#)', Age UK London, 2022

October 2023.

Contact: John McGeachy, Age UK London, [jmcgeachy@ageuklondon.org.uk](mailto:jmcgeachy@ageuklondon.org.uk)

## **AGE UK London Briefing: Increasing public toilet provision – addressing concerns about anti-social behaviour (Comments, reflections, mitigations:)**

### *Background*

At the London Borough of Southwark Health and Care Commission meeting on 19<sup>th</sup> September 2023, John McGeachy (an invited speaker) of Age UK London was asked about considerations around anti-social behaviour and the provision of public toilets. This was part of an item (Item 5) on public toilet provision. Following the meeting, comments on the subject were sought by John McGeachy by email from experts in the field of public toilet provision.

The following are responses sent as part of email conversations. They are specifically responses (verbatim) to the question ‘*What would you say to council officers who are reluctant to create new toilet provision because they are worried about anti-social behaviour.*’

#### **A: London Borough of Tower Hamlets: Kirsty Valentine (Ms), Programme Manager, High Streets Team, Growth & Economic Development Service (GED), Place Directorate**

##### **Economic Benefits:**

1. Acknowledging the wider economic benefits to the entire community (including business) and positive impact on resident’s health and wellbeing is of more importance than the cost to maintain public toilets.
2. Clean and safer public toilets make for clean & safer High Streets which enables residents, businesses & visitors to stay longer, shop for longer and ultimately spend more money.
3. More footfall and increased customers are needed to create a thriving High Street. Attracting residents to shop local & support local independent businesses in a post covid business environment is paramount for sustained economic growth and development.

We are aware that ASB is a concern for people, and we are addressing this through:

- Attendants on duty – where possible including attendants as their presence deters many forms of ASB.
- High presence of Enforcement officers/police/ASB team.” – ensuring a cross departmental involvement from the beginning & working closely with the ASB team, THEO’s (enforcement officers), the police etc to work collectively and supportively.

#### **B: Sara Carter MBA CMgr MCMI of Sara Carter Business Training and Consulting**

“I understand and respect your concerns regarding potential anti-social behavior. It's essential to consider the safety and well-being of our community. However, it's also crucial to recognise that access to clean and safe public toilets is a basic necessity for many residents and visitors.

To address these concerns proactively, various strategies can be implemented, such as regular monitoring, security measures, and cleanliness protocols, to ensure that the facilities are well-maintained and safe for all users. Additionally, we can collaborate with local law and council enforcement and community organisations to deter any anti-social behaviour in the vicinity.

Submission to the London Borough of Southwark review into public toilet provision

By providing accessible and well-maintained public toilets, we not only meet a fundamental need but also contribute to a cleaner and more welcoming community environment. Let's work together to strike a balance between addressing concerns and fulfilling the essential needs of our residents and visitors. "

**C: Gail Ramster, Senior Research Associate, The Helen Hamlyn Centre for Design, Royal College of Art**

It is important to "to find out what the specific type of ASB is that they are concerned about (if there is one). Vandalism has very different route causes to drug use, for example. At the One Kilburn meeting, where they'd managed to get all sorts of services in the same room, the Police Community Support Officer described vandalism as people drawing attention to themselves whereas the more probable ASB was about hiding in the toilets (for drug use or simply shelter).

They also had representatives from the Drugs and Alcohol Service there, who spoke about using more supportive and inclusive language to get help to users rather than threatening, and to avoid confrontation. Both they and the police offered to provide training/guidance for the toilet staff.

The other insight from that was a Community Support officer offering to provide a presence near the toilets on a regular basis, but that for them, this is much easier weekdays, whereas weekends they've a skeleton service.

So, getting people in the room, figuring out the specific risks, mitigating against them, and understanding the reality of what support can be offered, will help build a plan.

It seems like a much harder situation which comes up a lot is where a toilet has already been closed because of criminal activity, and now the council want to reopen it. If a specific problem exists (such as prostitution and drug dealing, which was the case in Hackney), and there's no plan for how to stop it happening again, the police will be much more reluctant to support."



# Changing Places Toilets in Southwark

5

Agenda Item 7

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# What is a Changing Places toilet?

Changing Places toilets (CPTs) are large accessible toilets that include specialist equipment such as hoists and adult-size changing benches so people with specific care needs can receive safe and dignified personal care away from home.



# Regulatory changes

From Jan 2021 a significant change was made to building regulations, requiring the installation of Changing Places toilets in any new builds or major refurbishments in respect of

- Places of assembly, recreation and entertainment (e.g. art galleries, cinemas, libraries, museums) with capacity of 350+ or collections of smaller buildings such as zoos, theme parks with a capacity of 2000+
- Shopping centres or retail parks with a gross floor area of 30,000m<sup>2</sup> or more
- Retail premises with a gross floor area of 2500m<sup>2</sup> or more
- Sport and leisure buildings with a gross floor area more than 5000m<sup>2</sup>
- Hospitals and primary care centres
- Crematoria and cemetery buildings

More information [here](#)

# Changing Places Campaign

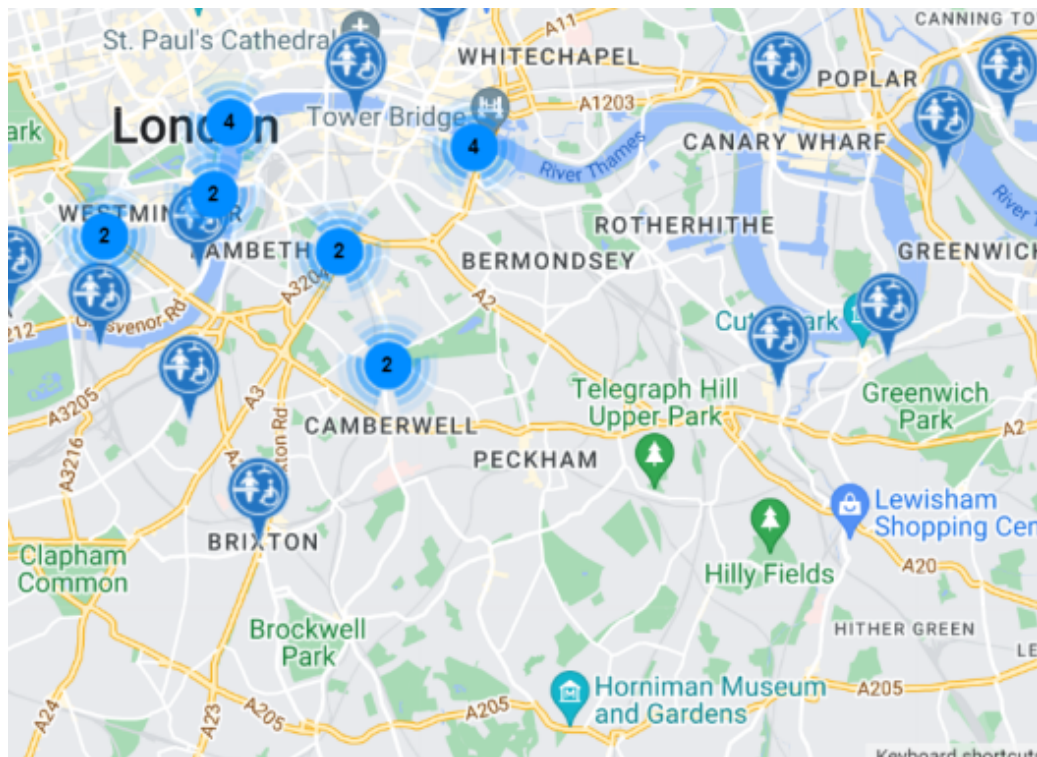
<https://www.bbc.co.uk/news/av/uk-england-lancashire-42780873>

# Changing Places in Southwark

## Existing provision

According to the [Changing Places National Map](#), there are 7 CPTs in Southwark:

- Guys & St Thomas' Hospital
- London Bridge Station
- Tate Modern
- Southwark Resource Centre
- The Castle Centre
- Cambridge House (?)
- City Hall (?)



The LA with the most CPTs is Leeds with 42 (approx. 1:19,000 population compared to 1:46,000 in Southwark)

# Changing Places in Southwark

## Evidence of local need

- Resident population includes:
  - 120 people issued with a hoist.
  - 130 residents that have double handed care needs (requiring care from 2 people).
- Additionally, we are a Central London Borough that welcomes a substantial number of visitors every year which include a significant number of disabled visitors

### Note

It is difficult to quantify the need for CPTs in Southwark as users include residents, visitors, and their respective carers (both paid and unpaid). These stats provide some insights but should be considered with caution, as they are likely to significantly underestimate the numbers of people that require these facilities.

*“We're unable to leave the house for more than 4 hours due to toileting needs, on this occasion we was 1 hour away from home and a toilet was needed there was no changing place toilet within the area so had to return home to use toilet as we have all necessary facilities at home”*

**Southwark Parent Carer**



# Changing Places in Southwark

## Local survey

### Top day out destinations for people surveyed:

1. Parks
2. Shopping/ Town Centres
3. Entertainment Venues (Cinema, Bowling, Theatre)
4. Leisure/ Sports Centre
5. Meals/ Dinner out

### Preferred locations for new CPTS:



A word cloud showing various locations and facilities. The most prominent words are 'Surrey Quays' and 'shopping centre'. Other visible words include 'Nunhead community', 'Sainsbury Sydenham cinema', 'Rye Park', 'Dulwich council sports centre', 'Fox on the Hill Library', 'Dulwich Park Picture', 'Park - Bede Peckham community Centre', 'Cheery Tree', and 'House Transport Hubs'.

50% of respondents that answered this question mentioned Surrey Quays.

1/3 also referenced one or more parks including Southwark Park, Peckham Rye Park and Dulwich Park.



# Government scheme

In 2021, Local Authorities were invited to opt-in to share a £30m capital fund to install more Changing Places toilets across England in existing buildings.

Southwark was successful in a bid for £120K to support the development of 3 new facilities at:

1. **Surrey Quays**
2. **Dulwich Park**
3. **Peckham Leisure Centre (upgrade to existing facility)**

Match funding of £80K was agreed by the C&A capital board.

# Progress to date

**Peckham Pulse:** Refurbishment underway, anticipated completion by end Nov.

**Dulwich Park:** Planning application approved on 11th September. Installation target date of 22nd November 2023.

**Surrey Quays:** Appropriate site couldn't be identified due to ongoing re-development of this area. Assurances received from Tesco that new store will include a CPT.

A change request was submitted to DLUHC to request a reduction in delivery outputs from 3 units to 2 with the remaining funding used to off-set the additional cost of the modular unit at Dulwich Park (previously being met by C&A match-funding).

The C&A match funding has been parked for now, to allow us to explore other opportunities to develop CPT provision without the constraints of the government grant terms.

# Plans for other CPTs in Southwark

Canada Water Leisure Centre

Una Marson library (due to open Autumn 2023)

CPT included within [proposed upgrade to Peckham Rye Station](#)



## Briefing note

**To:** Health & Social Care Scrutiny Commission

**From:** Matt Little, Principal Strategy Officer, Local Economy Team

**Title:** Access to Toilet facilities – Business engagement

**Date:** 18 October 2023

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## Introduction

To date, the Local Economy Team currently plays no active role in support of delivery of a community toilet scheme. However, this briefing note provides the Scrutiny Commission with an outline of the range of business engagement channels that could be utilised to engage businesses and support delivery of a toilet access strategy.

### 1. Business e-newsletter and council website

The council has a business e-newsletter that goes out to over 12,000 subscribers on a monthly basis. This could be used to digitally promote a Toilet Access scheme to a wide range of business across the borough.

We can also add a section on the business pages on the council website.

### 2. Town Centres and High Streets

In line with the Council Delivery Plan commitment to promote thriving town centres and high streets, we have developed Town Centre Action Plans for Bermondsey, Camberwell, Canada Water, Elephant & Castle / Walworth, and Peckham. Working with the Cabinet Member for Jobs, Business and Skills, officers are working closely with local businesses and other key stakeholders to further develop these action plans in line with local needs and challenges.

As part of ongoing town centre engagement, visits to the high streets in these areas are made (approx. monthly), which could be used to promote a Toilet Access Scheme to local shops. We could target specific types of premises or locations required. As the scheme rolls out we could target specific high streets depending on the number of sign ups and type of providers in each geographical area.

Additionally, we run regular (approx. bi-monthly) engagement events for local businesses in each of these town centres which could be used to promote a Toilet Access Scheme. Relevant officers can present the scheme to local businesses and explain the wider benefits and also how it can help attract customers, for example by bringing more people to the area and encourage them to stay longer.

### **3. Business Networks and BIDs**

There are five Business Improvement Districts (BIDs) in Southwark<sup>1</sup>, which meet regularly with the Cabinet Member for Jobs, Business and Skills and officers. There are also various business networks<sup>2</sup> which we can use to promote a Toilet Scheme to their members and the potential benefits it offers.

### **4. Voluntary and Community Sector (VCS)**

Community Southwark - the umbrella body for the voluntary and community sector in Southwark – can be engaged to promote a Toilet Scheme to VCS members.

Colleagues in our Communities Teams would work with key VCS organisations, who support our older residents, to feed into the development of a toilet scheme and promote to members across the borough.

Brief Ends

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<sup>1</sup> Better Bankside, Blue Bermondsey, Southbank (partial), Team London Bridge, and We Are Waterloo (partial)

<sup>2</sup> Including: Federation of Small Businesses (London), Southwark Chamber of Commerce, SE5 forum, Elephant & Castle business forum, and Peckham business forum (soon to launch).

## Councillor Evelyn Akoto

### Cabinet Member for Health and Wellbeing

Cllr Akoto's responsibilities include:

- **Public health** - including reducing health inequalities; Covid19 and health protection; Community Health Ambassadors; vaccinations, immunisation and screening; health visiting, school nursing and childhood obesity; sexual health, contraception and HIV; and smoking, drug and alcohol services
- **Adult social care** - including adult safeguarding; home care; nursing and care homes; occupational therapy, aids and adaptations; and commissioning extra care, sheltered and supported housing
- **Health and wellbeing partnerships** - overseeing key stakeholder relationships such as Partnership Southwark and SC1
- **Improving health services** - working with the NHS, general practice (GPs), local hospitals, community health services and pharmacists,
- **Adult mental health**
- **Older people** - including ensuring Southwark is an age friendly borough and opening a modern centre for Black African and Caribbean elders
- **Adults with disabilities** - including social care support; increasing the voice and influence of people with disabilities and their families in local decision making
- **Carers** - support for people who are providing unpaid care for adult family members or friends with a disability or health condition, including respite care
- **Food** - making Southwark a right to Food borough with access to affordable healthy food for all

Cllr Akoto's additional responsibilities now include:

- **Reducing crime and anti-social behaviour** – including community wardens, anti-social behaviour team, noise service, CCTV, public spaces protection orders, preventing hate crime, tackling modern day slavery
- **Violence reduction** – working to end misogyny and violence against women and girls; and youth violence and the criminal exploitation of young people
- **Domestic abuse** – support for people who have experienced domestic abuse, Women's Safety Centre and safe spaces
- **Improving policing** – promoting equitable policing and strengthening community relations with the police
- **Licencing** – of premises serving alcohol or late night refreshment and of gambling
- **Environmental health** – including trading standards, food safety and environmental protection
- **Private rented housing** – increasing protections for private renters licencing and advice services for private sector renters



<b>Item No.</b>	<b>Classification:</b> Open	<b>Date:</b> 15 November 2023	<b>Meeting:</b> Health and Social Care Scrutiny Committee
<b>Report title:</b>		Blue Badge Scheme Briefing	
<b>Ward(s) or groups affected:</b>		All	
<b>Report Author:</b>		Shaidi Khan	

### 1. Background Information

Southwark Health and Social Care Scrutiny Commission has called for a briefing to be provided to the Commission on 15 November 2023 to address the following:

- The criteria for Blue Badges
- The Blue Badge application process: including how people can access support and assistance in filling out an online form.
- Scope to reduce the time taken to make a decision to award Blue.

### 2. Blue Badge Scheme

The Blue Badge (Disabled Persons' Parking) Scheme was introduced in 1971 under Section 21 of the Chronically Sick and Disabled Persons Act 1970.

The Scheme aims to help people with severe mobility problems caused by visible and non-visible ('hidden') disabilities to access goods and service by allowing them to park close to their destination.

The Local Authority is responsible for administering the scheme.

### 3. Blue Badge Criteria

The Department for Transport (DfT) issue guidance to Local Authorities on how to administer the scheme, which also sets out the eligibility criteria for Blue Badges. Full details can be found on [Running a Blue Badge parking scheme - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/running-a-blue-badge-parking-scheme)

There are two main routes to qualify for a Blue Badge, without further assessment (known as automatic criteria) or by further assessment (non-automatic criteria).

### 4. Blue Badge Criteria Discretion

The Local Authority has no discretion regarding the eligibility criteria, which must be applied consistently to all applicants, ensuring a fair and robust service.

### 5. Blue Badge Criteria – Automatic

The automatic criteria is for those who have a specific disability or are in receipt of a specific benefit. These include:

- Higher Rate of the Mobility Component of the Disability Living Allowance
- Receive 8 points or more, for the moving around activity of the mobility component of Personal Independence Payment (PIP)
- Receives 10 points specifically for Descriptor E under the "planning and following journeys" activity, on the grounds that they are unable to undertake any journey because it would cause them overwhelming psychological distress;
- Severely sight impaired

## 6. Blue Badge Criteria – Non Automatic

The criteria are for those persons who are certified by a suitably qualified assessor as having an enduring and substantial disability which causes them, during the course of a journey, to:

- Be unable to walk
- Experience considerable difficulty whilst walking, which may include very considerable psychological distress; or
- Be at risk of serious harm when walking; or pose, when walking, a risk of serious harm to any other person.

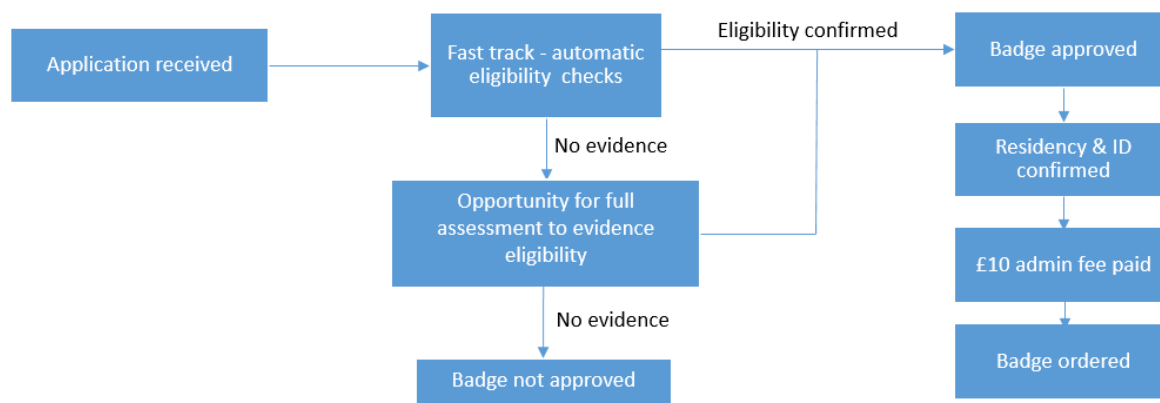
## 7. Application and process

Residents apply for a Blue Badge by completing an application form on Southwark website. The form requests various information to support the resident in evidencing eligibility via all routes including, the option to apply and provide information for a Freedom Pass. My Southwark Service Point offer support to those who require assistance with completing the online form.

Once evidence of eligibility is confirmed, the applicant is advised accordingly. Proof of identity and residency is required before a badge can be issued, along with an administration fee of £10, which is charged by most London Boroughs.

A Blue Badge is then ordered using the national system, which ensures consistency and allows for enhance physical securities making it harder to forge. The Blue Badge is posted via Royal Mail recorded delivery, directly from the printing hub to the applicant's home.

Figure 1 - Application process



## 8. Fast tracked application

Where eligibility can be confirmed using system checks or from the information provided by the applicant, the badge is approved swiftly via the fast track service.

If no evidence of eligibility is found the application is processed via the non-automatic route. Approximately 40% of applications are fast tracked.

## 9. Full Non-automatic route assessment

To allow applicants the best chance in evidencing eligibility to access the scheme, a variety of tools are used, including:

- Arranging and booking appointments with assessors to gain further information
- Writing to applicants to provide further information
- Allowing applicants the time to obtain and return information

External occupational health assessors are used to review the information against the DfT legislation to determine eligibility. They are qualified and trained to carry out assessments and are all registered with the Health and Care Professions Council, ensuring quality of assessments.

### 10. Processing times

The demand for Blue Badges continues to grow. Approximately 500 applications are received a month. There are almost 7,800 current Southwark Blue Badges. Southwark Council has issued around 3,000 badges so far, this year.

Blue badges are issued for a maximum of three years, shorter if the badge is being aligned to a specific benefit.

Applications can be fast tracked, in order to do so applicants need to provide the correct information and evidence of eligibility. This is usually via the automatic route.

45% of applications are approved within 5 working days. Table 1 below shows the length of time taken for a badge to be ordered from the application date.

Figure 2 - Snapshot from August 2023, of the 234 badges ordered

	No. of Days taken to order badge	No. of applicants	Comments
Average	13	5	
Shortest	0	8	Ordered on day of application.
Longest	111	1	11 days to approve badge. 100 days was waiting on applicant.

### 11. Reducing Processing times

The general timeframe that Local Authorities take to process applications to make decisions of eligibility is 12 weeks.

Southwark Council's current decision process is completed in 10 weeks, which is 2 weeks better than the general timeframe. The 10 weeks processing time, allows for arranging appointments, appointments to be attended, time for applicants to request and obtain additional information from medical practitioners and various professional bodies, which then is reviewed and carefully assessed. It is a robust, multistage process that allows applicant a good opportunity to evidence eligibility.

Consideration is being given to the different options of how processing times can be reduced, including reviewing the application form to encourage customers to provide the correct information at first point of contact, exploring if the assessment process can be further streamlined without negatively impacting on the support provided to the customer to help them evidence eligibility or reducing the quality and comprehensiveness of assessments, reducing the time given to residents to obtain and provide further information, engaging in conversations with national Blue Badge experts, mobility forums, assessment experts and Blue Badge LA peer groups to share best practice.

The Council must be mindful that when reducing processing times, that information is still assessed carefully and the correct decision are made based on the information provided. That the customer is provided the time and information to obtain additional medical information to support them evidence eligibility, and that the service continues to issue

badges to only those who are eligible to the scheme and that the decisions are not rushed and badges incorrectly issued.

Failure to administer the scheme correctly, including not making the correct decisions or providing the support customers require and/or allowing them the time to engage with the process, will result in increased members enquiries, complaints and appeals. It may also mean that the decisions are not made in line with the legal criteria.

## **12. Challenges**

Some applicants are reluctant to provide detailed information believing it an invasion of privacy distrusting the council's use of data and incorrectly believing that personal details, medical records and other data can be accessed by other council services.

There are misconceptions that an illness or a person with some walking difficulty would automatically qualify for a Blue Badge, or that a GP can approve one. This is incorrect.

Medical interventions are delayed due to the NHS backlogs, which results in applicants having reduced medical documentary information to support their application.

## **13. Support in evidencing eligibility**

In 2022, approximately 20% of applications were not approved, due to lack of evidence of eligibility.

Applicants who have not provided enough information are contacted to provide further information. External assessors engage with applicants to support them explore every route of eligibility and guide them in providing the information to evidence this. If no evidence is found, the applicant is advised their application has not been approved and the reasons why. Where possible, if it is felt that an applicant may be eligible and has not provided any information to evidence eligibility, they are advised of the information that they would be expected to have, so that this can be provided.

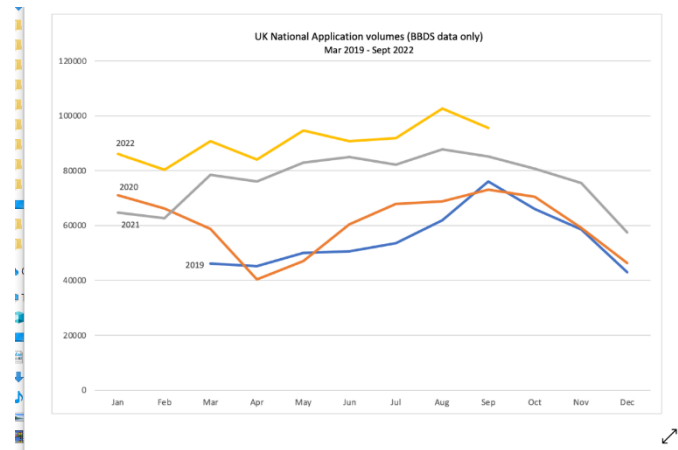
In 2022, 172 applicants whose badge was not awarded, requested for the decision to be reviewed. Of those 52% provided further evidence to eligibility and the badge was awarded.

Last year, of the 5037 applicants, 34 applicants (0.6%) submitted a complaint, of which less than a third were upheld.

## **14. Protecting the scheme's integrity**

Blue Badges applications continue to increase, year on year, quite significantly as demonstrated in the table below.

Figure 3 - UK national Blue Badge application volumes



Source: Department for Transport

Increased number of Blue Badges coupled with a national reduction in parking provision, especially in London, makes the scheme more valuable and access to disabled parking at a premium. The Council not only has a legal duty to ensure the criteria is applied correctly, but also to protect the integrity of the scheme, so that those who qualify are able to access the scheme and those who provide no evidence of eligibility are not incorrectly issued with a badge, diluting the access of the scheme.

Considering the financial challenges, the Council should take every opportunity to raise funds where appropriate. It is estimated that around £700 is lost in council revenue (parking fees), for every badge incorrectly issued.

Blue Badges are becoming more valuable as the monetary concessions that can be accessed widen (eg congestion charge relief, Low Traffic Neighbourhood (LTN) dispensation, free parking spaces). The risk of fraudulent use is therefore high with a potential loss of revenue to the council. The parking team have partnered with Blue Badge Fraud Investigations, to carry out investigations across Southwark and also various operations with the police to combat Blue Badge misuse and fraud.

<b>Lead Officer</b>		
<b>Report Author</b>	<i>Shaidi Khan</i>	
<b>Version</b>	<i>Final 6 November 2023</i>	
<i>Dated</i>	November 2023	
<b>CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER</b>		
<b>Officer Title</b>	<b>Comments Sought</b>	<b>Comments Included</b>
Head of Specialist Services Michelle Peake	Yes	Yes

Director of Exchequer, Finance and Governance Dominica Cain	Yes	Yes
Cabinet Member for Climate Emergency, Clean Air and Streets Briefing  Cllr McAsh	Yes	Yes
Date final report sent to Scrutiny Team		6 November 2023



## Health & Social Care Scrutiny Commission

**MUNICIPAL YEAR 2023-24**

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		<b>Dated: October 2023</b>	