

<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	
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### 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/government/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.

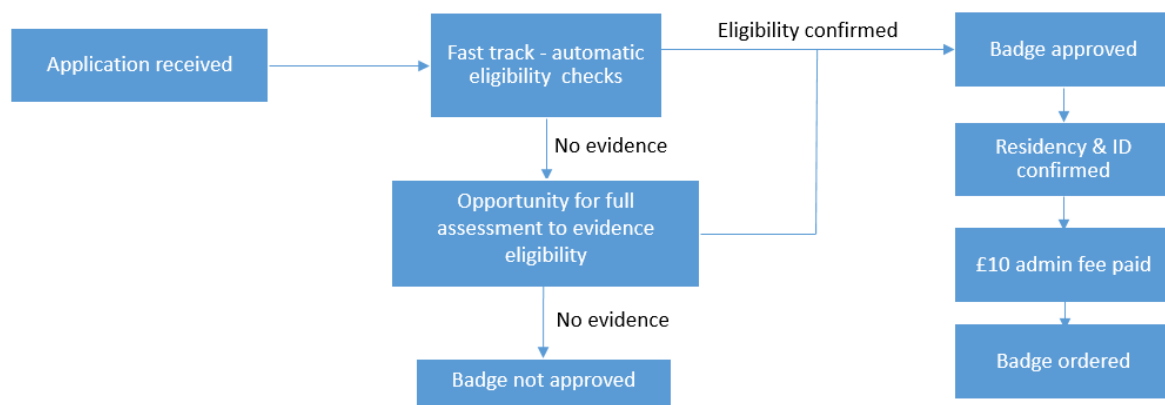
## 7. Application and process

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.

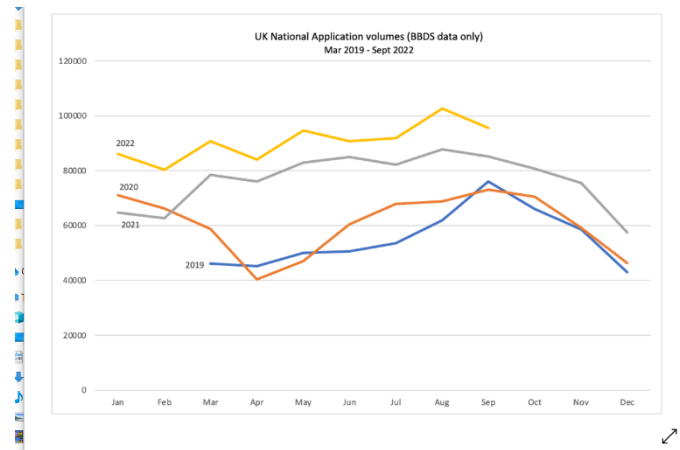
In 2022, 172 applicants whose badge was not awarded, requested for the decision to be reviewed. Of those 52% provided further evidence to eligibility and the badge was awarded.

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 carryout investigations across Southwark and also various operations with the police to combat Blue Badge misuse and fraud.

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<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