

To: Audit, Risk and Scrutiny Board

On: 21 March 2022

Report by: Head of Digital, Transformation and Customer Services

Heading: Blue Badge Process Review – Progress Update

1. Summary

1.1 Following the Council Motion, shown below, on 30th September 2021 regarding Blue Badge qualifications, the Head of Customer and Business Services was asked to conduct a review into the Council's processes for Blue Badge applications. Due to recent structure changes, the responsibility for this review now lies with the Head of Digital, Transformation and Customer Services.

Council recognises that Blue Badge permits have in recent years become much more restrictive than before, ensuring that there is no abuse of this system. However, the restrictions seem to focus only on whether or not someone can physically walk any distance. Some residents have what is often referred to as 'unseen' illness or affliction so that, while they have the appearance of being able bodied, they in fact have illnesses which demand an ability to park as close as possible to, for example, toilet facilities if they are to have any quality of life. Our on-line application automatically refuses any such application. Council requires to re-examine its eligibility criteria and ensure that those sufferers who require a Blue Badge can have access to a simple system of application and have to go through a very unwieldy and sometimes unsuccessful application process with staff who then have to make individual judgements on these applications.

1.2 The Council Motion highlighted four areas of concern;

1. Eligibility Criteria,
2. Applications for "Unseen" illnesses,
3. Automatic refusal of badges
4. The online application process.

As a result of the Council motion, an end-to-end review of the Council's Blue Badge administration processes was undertaken.

- 1.3 Members are reminded that the Council is limited in its ability to alter eligibility criteria or the national application process for Blue Badges.

2. **Recommendations**

- 2.1 To note the limitations placed on the Council to alter the eligibility criteria for blue badges
- 2.2 To note the use of a national application form supported by the gov.uk platform which the Council is unable to change
- 2.3 To note the additional work being carried out as a result of the review to provide a more efficient and customer focussed application process.

3. **Background**

- 3.1 The National Blue Badge Scheme is managed by each Local Authority and is regulated by The Disabled Persons (Badges for Motor Vehicles)(Scotland) Regulations 2000.

There are two Blue Badge schemes which are currently administered by Local Authorities in Scotland, the first is the original scheme which awards badges based, primarily, on a person's ability to get around and the second is based on "unseen" illnesses which result in a person being a danger to themselves and others while around traffic.

The administration of both schemes is the responsibility of the Customer Services team, with the support of the Health and Social Care Partnership's Occupational Therapy team.

- 3.2 In terms of the points raised in the council motion, the following sections outline the current position and notes the limitations placed on the Council when managing the scheme.

1. Eligibility Criteria

The Blue Badge eligibility criteria is outlined in the legislation and is shown below. Applications under the following criteria are reviewed by the

Customer Services team, and where sufficient evidence is provided with the application, these will be approved and processed through the National manufacturing and distribution centre.

- You receive the higher rate of the mobility component of Disability Living Allowance.
- You receive the Mobility Component of Personal Independence Payment - 8 points or more in respect of moving around or 12 points or more in respect of Planning and Following Journeys.
- You are registered as blind (severely sight impaired).
- You receive a War Pensioner's Mobility Supplement.
- You have been both awarded a lump sum benefit at tariffs 1-8 of the Armed Forces and Reserved Forces (Compensation) Scheme and are certified as having a permanent and substantial disability which causes you to be unable to walk or have very considerable difficulty in walking.

If a customer does not meet any of the above criteria, they can apply under the following discretionary criteria, and they are asked to provide additional information in the online application form. This additional information may include details of their condition, medication, and any healthcare support they are currently receiving.

1. You are over the age of two and have a permanent and substantial disability which means you are unable to walk.
2. You are over the age of two and have a permanent and substantial disability which means you are virtually unable to walk.
3. You are over the age of two and have a temporary and substantial disability, for more than 12 months but less than 3 years, which means you are unable to walk.
4. You are over the age of two and have a temporary and substantial disability, for more than 12 months but less than 3 years, which means you are virtually unable to walk.
5. You drive a vehicle regularly and have a severe disability in both arms which means you are unable to operate all or some types of parking meters.
6. You drive a vehicle regularly and have a severe disability in both arms which means you have considerable difficulty operating all or some types of parking meters.
7. You are under the age of three and have a medical condition that means you must always be accompanied by bulky medical equipment.

8. You are under the age of three and have a medical condition that means you must always be kept near a vehicle in case you need emergency medical treatment.

Anyone who applies under the additional criteria outlined above will, in line with the legislation, have their application form reviewed by an Occupational Therapist. They may decide to approve or decline the application, contact the customer for additional information on their mobility issues or invite the customer to attend an independent mobility assessment which is also carried out by an Occupational Therapist.

Once the decision is made, the customer is informed and where the badge is approved, the Customer Services team will process this through the national system. When a badge is declined, the customer has the right to request a review of decision within 6 months. This review is carried out by the Occupational Therapy Team Managers.

2. Applications for “Unseen” illnesses

In 2017 Transport Scotland revised and extended the eligibility criteria to allow people who pose a risk to themselves or others in traffic to apply for a disabled person’s parking badge, provided they meet the criteria.

The eligibility criteria was extended to:

- a) A person who has a mental disorder within the meaning in the Mental Health (Care and Treatment)(Scotland) Act 2003,
- b) Who received specified social security benefits at specific rates, and
- c) Who lacks awareness of danger from traffic, which is likely to compromise their safety, or the safety of others, as a result.

As part of the application process under the extended eligibility criteria, the customer must provide evidence from a registered Healthcare Professional.

3. Automatic Refusal of badges

The only circumstance where a person’s application is refused by the online system at the point of application is when they state that they do not

meet any of the automatic criteria listed above and they cannot identify with any of the eight discretionary criteria outlined above.

This is not something the council can change, as the customer is confirming themselves that they do not meet any of the automatic or discretionary eligibility criteria.

4. The online Application Process

The online application process is supported by the Gov.uk website. This is a national application system which the Council does not manage and has no remit in making direct changes or improvements.

- 3.3** Members are asked to recognise that the Council is limited therefore in its ability to change the eligibility criteria or the national application process. However, the recent end to end review has highlighted several process improvements which the Council can make to ensure the Blue Badge application process is clearer, and more customer focussed.

The changes which have been identified so far and are currently being progressed by the Customer Development and Technology Teams are as follows.

- **Website Information**
Changes are being made to the information available to customers, to ensure they are better informed before starting the application process.
- **Improved Customer Communication**
Customers will be provided with more regular updates as their application moves through the assessment process, this will keep them informed at each key stage to prevent them having to contact the council for updates.
- **Online Payments**
Customers will be given the option to make the payment for their badge online, once it has been fully approved.

- 3.4** The review into Blue Badge processes will continue, with the team planning to make significant improvements to the current, paper based, application process for unseen illnesses. This will aim to make this process available online and over the telephone, greatly improving the customer experience and reducing the time it will take for this group of customers to complete an application.

Implications of the Report

1. **Financial** - None
2. **HR & Organisational Development** - None
3. **Community/Council Planning** –
 - Our Renfrewshire is fair - The Blue Badge scheme is governed by legislation which results in all applicants following the same process and being assessed against the same criteria, with support from Occupational Therapy professionals responsible for making discretionary decisions.
 - Working together to improve outcomes – customer research has been carried out in the end-to-end review process, ensuring the voice of the customer is included in any recommended changes
 - Working together to improve outcomes – Regular liaison meetings take place with the Health and Social Care Partnership to review the Blue Badge process and continue to support applicants in the most effective manner
4. **Legal** – None
5. **Property/Assets** – None
6. **Information Technology** - None
7. **Equality & Human Rights** - The Recommendations contained within this report have been assessed in relation to their impact on equalities and human rights. No negative impacts on equality groups or potential for infringement of individuals' human rights have been identified arising from the recommendations contained in the report because the Blue Badge scheme has been equality impact assessed by Transport Scotland as part of the legislative process.
8. **Health & Safety** - None
9. **Procurement** – None
10. **Risk** - None
11. **Privacy Impact** – Privacy Impact Assessments have been completed for the Information Systems and external suppliers used in the end-to-end Blue Badge process

12. **Cosla Policy Position** – None.

13. **Climate Risk** - None

List of Background Papers

(a) None

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