

BCP Corporate and Community Overview and Scrutiny Working Group Report on the Blue Badge Service

1.Introduction

1.1 At the Corporate and Community Overview and Scrutiny Committee meeting held on 12 June 2023, the Committee discussed the Blue Badge application process which according to the Council's website could take twelve weeks to process. The Committee agreed to form a member led informal Working Group (WG) to scrutinise the Blue Badge application process to evaluate why the process could take this long, if the time could be reduced, and whether a further formal, in-depth evaluation of the system by the committee is warranted. The Committee agreed that Cllr's Stephen Bartlett, Tony Trent, and Kate Salmon would form the WG and report back to the Committee at its meeting on 9 October 2023.

1.2 On 14 July 2023, the WG met with Council Officers Matti Raudsepp (Director of Customer, Arts and Property) and Stuart Walters (Customer Services Manager) to gather information on the Blue Badge system. Officers provided an overview of the Blue Badge system and answered questions during and after the meeting.

1.3 The WG received feedback on the Blue Badge Application process from the Clinical Reference Group and this is reflected in this report.

2.Blue Badge Overview

2.1 The aim of the Blue Badge scheme is to help people with severe mobility problems caused by visible and non-visible (hidden) disabilities to access goods and services, by allowing them to park close to their destination. The scheme is open to eligible people irrespective of whether they are travelling as a driver or as a passenger.

2.2 The scheme provides a national range of on-street parking concessions to Blue Badge holders. It allows them to park without charge or time limit in otherwise restricted on-street parking environments and allows them to park on yellow lines for up to three hours, unless a loading ban is in place.

2.3 The Blue Badge system is a National System and the Council's responsibility is to process the applications in accordance with the rules directed by government.

3. Department for Transport Role

3.1 The Department for Transport (DfT) is responsible for the legislation that sets out the framework for the scheme. This includes:

- a. the prescribed descriptions of disabled people to whom a badge may be issued i.e., the eligibility criteria.
- b. the maximum fee that can be charged by local authorities for issue of a badge.
- c. the period of issue of a badge.
- d. the grounds for refusal to issue a badge and the grounds to withdraw a badge.
- e. the circumstances in which a badge should be returned to the issuing authority.
- f. the way a badge should be displayed.
- g. the national concessions available to badge holders under the scheme.

4. Local Authority Role

4.1 Local authorities are responsible for the day-to-day administration and enforcement of the scheme. They are responsible for determining and implementing administrative, assessment, and enforcement procedures which they believe are in accordance with the governing legislation.

4.2 Whatever the local arrangements, it is important that there is effective communication between the teams that issue Blue Badges and those that conduct on-street enforcement.

4.3 It is the responsibility of each local authority to ensure that badges are only issued to residents who satisfy one or more of the eligibility criteria set out in the legislation that governs the scheme. Under no circumstances should anyone who does not satisfy at least one of the criteria receive a badge.

5. Blue Badges in the BCP Council Area

5.1 The population of BCP Council area is 400,300 as per the 2021 Census, within that figure 73,838 residents identify as having a disability. Of this figure 30,616 state that the disability 'prevents them from undertaking regular activity a lot'.

5.2 There are currently c 21,000 Blue Badges on issue within the BCP area.

5.3 Blue Badge applications comprise new applications and renewal applications, and the Council processes about seven thousand applications per annum.

6. Application Timescales

6.1 The Government Department for Transport says a decision on an application should be made within twelve weeks and this is the time stated on the Council's website. The average time for BCP Council to process the application is currently eight weeks. There are fluctuations in this timescale depending on the nature of the application and the evidence of eligibility that is provided.

6.2 Following a decision to award a badge, and receipt of the fee, the badge is printed and despatched by a third-party company appointed by the DfT. A badge is usually received by the applicant between five and seven working days after payment has been received.

6.3 The DfT national database has an option that can be enabled which will send a reminder before a badge is due to expire, this option is not currently enabled for BCP. The Council is assessing the reminder facility to determine associated cost and how, or if, it could be used.

7. Blue Badge Cost

7.1 The cost for producing each badge, including despatch, is £3.40. A further £1.38 is charged for each additional entry in the DfT provided nationwide database. The remainder of the £10 fee, £5.22, is used to cover some of the Council's staff costs. Where an applicant is referred to Adult Social Care for a mobility assessment, a charge of £50 per assessment is made to the Customer Services budget. Historically there are about two mobility assessments per month at an annual cost of £1,200.

8. Council Resources

8.1 The Blue Badge service is managed and delivered from within the Council's Customer Services Department. Adult Social Care also become involved if a mobility assessment is needed. This may be because the evidence provided does not provide enough insight to the impact on the individual or because the council have refused the application and the applicant has requested a review of the decision. In both cases Adult Social Care will undertake a mobility assessment, in person, and give a decision.

8.2 The online application and background database is a national government system. It is not a case management system, therefore BCP have procured a Blue Badge Customer Management (case management) system that interfaces with the Government system.

8.3 Applications for a Blue Badge are made on-line, but paper applications are also available. Currently 88% of applications are made on-line, and 12% are paper applications.

8.4 The Council Blue Badge team comprises four individuals whose role is to review and make decisions on applications and renewals. The team has three part time and one full time members of staff, supported by a Team Manager. The Team Manager has responsibility for the Blue Badge service as well as three other functions within customer services.

8.5 In the main, the team are working remotely and access their workload from the Blue Badge case management system for online applications, and hard copy (paper) applications are scanned to the case management system by the Corporate Digital mailroom (also part of Customer Services).

8.6 The Team Manager works remotely but spends at least one day per week in one of the hub offices; more frequently if there is a need to attend specific meetings or to meet in person with their direct reports. The team's performance is tracked monthly.

8.7 The Team has long standing and experienced staff.

8.8 The total number of person-hours hours is 6,835 but this does not include the telephone team.

8.9 The cost of the service includes the direct staff costs (assessing team), badge production and system. This gives a high-level cost of £161,000 (rounded), offset by £80,000 income, leaving a net shortfall (cost to the Council) of £80,000, which can fluctuate each year depending on the number of applications and renewals.

9. Blue Badge New Applications

9.1 There are two eligibility criteria, 'eligible without further assessment,' and 'eligible subject to further assessment.' These are sometimes known as 'automatic eligibility' and 'non automatic eligibility.' Automatic eligibility applications are quicker and easier to process. The ratio of badges currently on issue within BCP are 'eligible without further assessment' 30%, and 'eligible subject to further assessment' 70%.

9.2 Where applications require supporting evidence from medical specialists, the medical specialists must respond to such requests within a reasonable timescale suggested by expert medical and social care professionals.

10. Blue Badge Renewal Applications

10.1 A set of 'core principles' on the Blue Badge reapplication process exist. They are intended as a guide for local authorities and were developed by an independent review research team drawing on significant input from experienced practitioners. Their use is not mandatory, and it remains the responsibility of local authorities to determine their renewal process. The core principles are:

- a. Send all badge holders a reapplication reminder three months in advance of the expiry date of their Blue Badge.
- b. Verify the applicant's address and contact details, and personal information are correct, updating the Council's records, as necessary.
- c. Update the vehicle registrations held on record by the local authority to aid the continuing enforcement of the Blue Badge Scheme.
- d. Secure the return of the expired Blue Badge so that it can be destroyed, retaining a note of this badge's serial number on the applicant's Blue Badge record.

10.2 Renewal Applications also fall into the 'without further assessment' and subject to further assessment categories.

10.3 For 'without further assessment' applications, the council must verify that the applicant continues to demonstrate eligibility by checking local records, for example the Blind Register for those registered blind. Where necessary, the council will also request copies of other documents required to support the renewal application. The council will wherever possible ensure the re-application process is as quick and efficient as possible, but where a renewal application can no longer qualify under the 'without further assessment category, the application will then fall into the 'further assessment' category.

10.4 Further assessment applications require local authority records to be checked to see how the applicant was assessed previously and whether this included a recommendation that the applicant needed to be reassessed upon reapplying. Where an applicant's condition has improved since their last application, the application is considered in the same way as the new badge application.

11. Working Group Analysis

11.1 From the detailed information provided by officers, examination of the application forms and feedback from applicants, the Blue Badge application system appears complex and labour intensive. The complexity is driven by the strict rules that are set nationally and must be rigorously observed to prevent fraud, particularly as ownership of a Blue Badge confers parking benefits than can hold significant financial value for a badge owner.

11.2 Applicants seeking to renew a badge comment that the information required to support the application is far too detailed and overly intrusive. Applicants question why information submitted when the badge was originally applied for, is asked for again, for example, proof of identity, proof of address, proof of benefits, National Insurance Number, details of current Blue Badge and a new head and shoulders photograph. Compiling the information needed is reported to be time consuming and the application process stressful. The WG understands why applicants may make these comments and are sympathetic to the views expressed, but also understands that it is not currently possible for the IT systems used for processing applications to extract relevant data, and manual research across different platforms would not be efficient; hence, the burden of providing the required information has to fall with the applicant. It should also be remembered that over the three-year period from when a Blue Badge was issued, the data held by the Council may no longer be valid. Furthermore, it is the applicant that is required to provide the information and to ensure it is correct, whereas it is the council's responsibility to verify the information supplied is correct. Hopefully, as the council's transformation programme progresses, it will be possible for data to be shared across services to minimise the duplication of data entry and the automatic extraction of relevant data to the services required.

11.3 The WG recognises that many Blue Badge applications are made on behalf of the applicant by a carer, and that this can be an onerous task particularly where the carer may not be related to the Blue Badge holder and where the Badge owner may be disabled. Difficulty of obtaining the information required can be challenging in these circumstances. It is suggested that where existing Blue Badge holders apply for a badge renewal, that a tick box is added to the application form to indicate they receive services from Adult Social Care. This would then allow verification of the application via data already held by the council.

11.4 The council website gives sufficient information on how to apply for or renew a Blue Badge, and that current applications are taking up to twelve weeks to process but the website does not explain why the process can take this long. The WG considers that a short brief on why an application may take this long may help applicants and where applicable their carers, to better understand the reasons why this is so, and why it is essential that applications are made in good time.

11.5 Although applications may take twelve weeks to process, there has been only one formal complaint against the service provision during 2022, whereas there were two compliments over the same period.

11.6 Notwithstanding the service is operating well and within government guidelines, officers had previously recognised that where applications are not made in sufficient time, then new badges may not be issued before an existing badge had expired. To minimise this concern, Officers had introduced a working practice to accelerate the renewal process. However, a Council Audit found that this was contrary to Government guidelines and increased the potential for fraudulent applications. Because of this the working practice was stopped.

11.7 The WG considered that delays in obtaining a Blue Badge are caused primarily by applications being submitted in an untimely way. There is currently no reminder

system in place, and unless applicants read the guidelines on the Council website, applicants would not necessarily be aware that an application could take twelve weeks. For applicants that did not use computers, this risk increased. The WG felt that applicants, may consider twelve weeks to be excessive in today's modern world of instantaneous computer transactions.

11.8 The WG considered if an increase in staff might reduce applications perceived to be late (caused by late applications), but this was rejected on the basis that additional staff could not reduce the number of untimely applications. Overall, the service was working well and within national guidelines; hence, the cost of additional staff could not be justified for the slight (if any) benefit that might ensue.

11.9 The Blue Badge Team work remotely and the WG considered if this has any benefit or disadvantages to service delivery. This is a complex issue and is beyond the scope of this study. But broadly, the WG felt that because of the administrative nature of the process, remote working had little or no effect on the overall delivery of the service.

11.10 The WG considered if the introduction of a reminder system could prove beneficial to the renewal application process. This would notify existing badge holders of the date by which a renewal application had to be submitted if they were to avoid a delay in receiving a replacement badge. The DfT national database has an option that can be enabled which will send a reminder before a badge is due to expire, but this option is not currently enabled for BCP. Work is currently being undertaken to assess if the system could be used, and what costs would be involved.

11.11 New applicants are informed about application timescales via information published on the Council's website. For applicants that do not use computers, access to information is by telephone to the Council Customer Services who will arrange for the application forms to be mailed to the applicant. A WG member also visited the town centre library where the Blue Badge application forms and web information can be printed on request (the WG understand that all BCP Libraries will provide this service). The BCP Customer Service Centre will also provide this service on request.

11.12 The WG are reassured that in cases where a Blue Badge is urgently needed, for example where an applicant had a terminal illness, a Blue Badge could be issued within fifteen working days. For applicants in this category, and who do not use computers, it is unclear how they would be aware that this service would be available to them.

11.13 The WG considered whether the Council's Blue Badge management system is to be integrated with modern digital technology being introduced via the Council Transformation Programme. Officers confirmed this is planned for 2025. We assume data sharing will result in a faster application process and a more efficient service provision.

11.14 A top-level service process flow chart for the Blue Badge service is not currently available. The long established and experienced team does not need this to provide the service, however, the WG considers that all Council services should have a documented flow chart for reference, training, and development purposes as these will

be essential if services are to be integrated into the future Customer Services Management System.

11.15 The Blue Badge fee is set by Government and is currently £10 for a badge that is valid for up to 3 years. Applicants with a terminal illness do not pay the fee. Given that the costs of providing the service exceeds the revenue received by approximately £80K, and the fee charged to Badge holders is low, (£10 for 3 years), the WG considers that a rise in the fee should be considered, albeit this would have to be decided by government. Nevertheless, should the Council support this view, representations to Government could be made through the Local Government Association (LGA)

12. Conclusions

12.1 The Working Group concludes that:

- a. The multiple categories of applicants, the complexity of the application process and the detailed information that government requires to be verified, often from external sources, offers little scope for reducing the current application timescales.
- b. A further formal, in-depth evaluation of the system by the Corporate and Community Overview and Scrutiny Committee is not warranted.
- c. The Blue Badge service is operating within service levels as defined by government guidelines.
- d. The nationally set Blue Badge fee does not cover the costs of providing the service.
- e. Applicants renewing their badges may not be aware that the application process can take twelve weeks, and this can lead to badges expiring before a new badge can be issued. It may be possible to issue a reminder to badge holders, but there will be a cost associated if this is implemented.
- f. The addition of a carers tick box to the application form to indicate they receive services from Adult Social Care may allow verification of the application via data already held by the council.
- g. An explanation on the council website of the reasons why an application may take twelve weeks to process may encourage applicants to submit applications in a timely fashion.
- h. In urgent cases, a Blue Badge can be issued within fifteen working days.
- i. The implementation and integration of a new Customer Services Management System with other new digital systems introduced via the Council's Transformation Programme, offers the potential to improve service response times. However, these benefits are unlikely to materialise before 2025.
- j. All Council services should have a documented flow chart for reference, training, and development purposes and these will be essential if services are integrated into the future Customer Services Management System.
- k. The addition of more staff to the Blue Badge team would not necessarily improve service delivery timescales.
- l. The Blue Badge Team are working remotely but this has no positive or negative effect on the overall delivery of the service.

13. Recommendations to Officers

13.1 The following recommendations are provided to Officers:

- a. Officers continue to explore methods and the costs of providing Blue Badge renewal applicants with a renewal reminder and make appropriate recommendations to the responsible cabinet portfolio holder.
- b. Officers consider the addition of a carers tick box to the application form to indicate the Blue Badge holder receives services from Adult Social Care which may allow verification of the application via data already held by the council.
- c. Officers consults with LGA members on the appropriateness of the Blue Badge fee to determine if an approach to government to increase the fee is desirable and/or warranted.
- d. Officers consider producing a Blue Badge service flow chart.
- e. Officers consider adding a note on the council website to explain why an application may take up to 12 weeks to process.