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**Improving Blue Badge administration,
assessment and enforcement:
good practice review**

Executive Summary

July 2011



In association with:

**The TAS Partnership Ltd
Atkins Transport Planning**



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EXECUTIVE SUMMARY

Introduction

This document is the Executive Summary of the final report on a wide-ranging review of the administration, assessment and enforcement practices used by Blue Badge issuing authorities in England. The review took place between September 2009 and January 2011, and was led by Integrated Transport Planning Ltd. (ITP) and the TAS Partnership Ltd. (TAS). The research team drew on specialist advice from the Department of Work and Pensions, Disabled Persons Transport Advisory Committee (DPTAC), College of Occupational Therapists, Chartered Society of Physiotherapists, Ferret Information Systems, the UCL Jill Dando Institute of Crime Science and Brunel University throughout the study. We also consulted with Blue Badge holders in different parts of the country to seek their views as Blue Badge 'service-users' on what constitutes good practice in terms of Blue Badge application, eligibility assessment, appeals and renewal practices.

This review should be read in conjunction with the updated Blue Badge Scheme Guidance published by the Department for Transport (DfT) in June 2011, which the findings from this research study have informed. Our findings underline the different policies and procedures adopted by local authorities to administer the Blue Badge scheme, particularly the different eligibility assessment practices in place. Our use of systems-thinking to objectively monitor and recommend improvements to the way the scheme is delivered highlighted the challenges that local authorities in England face when seeking to adopt more robust Blue Badge administration and eligibility assessment practices. Changing one thing, such as using independent mobility assessments (IMAs) to determine the eligibility of 'subject to further assessment' applicants, invariably means updating or revising a whole host of other practices to ensure they remain consistent and complementary.

This review therefore fills an important evidence gap regarding the opportunities that exist for local authority officers to overcome these challenges and instigate change to the way they deliver the Blue Badge scheme. It will help local authorities, and officers at DfT, to better understand the costs and benefits associated with different Blue Badge scheme practices by drawing on an evidence base of 'real world' local authority case studies and pilot study findings. It provides a means of defining good practice in the context of the Blue Badge scheme; and also offers a mechanism to monitor and assess the delivery, level of success and outcomes of the move to IMAs, in both the short and long-term.

Key objectives for the study

Five objectives defined in the research brief for the good practice review relate to Blue Badge scheme administration and assessment practices, which are the focus of this report. They were:

- ❑ To help local authorities make the change to improved administration and eligibility assessment practices by researching, piloting (if necessary) and identifying promoting existing good practices around assessment and administrative decision making.
- ❑ To research the assessment processes used by local authorities in determining whether an individual is eligible for a Blue Badge under the "eligible subject to further assessment" walking criterion and to determine to what extent such assessments are in line with assessment of the walking element of the Higher Rate Mobility Component of Disability Living Allowance (HRMCDLA). To seek views from local authorities and

stakeholders as to whether the walking element of HRMCDLA and Blue Badge “eligible subject to further assessment” walking criterion tests should be aligned.

- ❑ Subject to DfT’s decision on whether assessment of the Blue Badge walking criterion should be aligned with assessment for the walking element of HRMCDLA, to make recommendations on good practice for assessment of eligibility under the Blue Badge walking criterion. Recommendations should link in to the good practice recommendations arising in relation to administration and eligibility assessment practices that are currently used by local authorities in England.
- ❑ To research (and, if necessary pilot) joint mobility assessment arrangements with, *inter alia*, concessionary travel/adult social care.
- ❑ To develop evaluation measures and an evaluation protocol to assess the delivery, level of success and outcomes of the move to Independent Mobility Assessments (IMAs), in both the short and long-term.

Further objectives were identified in relation to the Blue Badge Centre of Excellence (CoE) Programme, which we reported on separately.¹ While the proactive enforcement of the Blue Badge Scheme is not a focus for this report, many of the good practice observations and recommendations it contains will significantly improve the scheme’s resistance to abuse.

The research team focused on responding to the objectives set out in the DfT’s research brief. However, it is important to recognise that the scope of this project evolved during the delivery period as a result of several factors. These included:

- ❑ Early recognition, following the development of case studies of good practice, that the range of different approaches to Blue Badge scheme administration and assessment was much wider than originally anticipated. Our initial review of procedures at 33 local authorities yielded seven different approaches to handling application forms and 10 different approaches to determining the eligibility of subject to further assessment applicants.
- ❑ The change of government in May 2010 and subsequent Comprehensive Spending Review, following which local authorities have placed greater emphasis on delivering public services more cost-effectively. The statutory nature of the Blue Badge scheme ensures its delivery is protected amid revised central government budget allocations for local authorities. However, engagement with local authority staff members during the course of the review revealed that senior managers are exploring how they can reduce costs associated with the delivery of the Blue Badge scheme without compromising on the fairness and consistency of administration and assessment practices.

Consequently, the objective of piloting different approaches to conducting Blue Badge eligibility assessments under the ‘subject to further assessment’ walking criterion evolved during the course of the project. The pilots we conducted focused primarily on validating the eligibility assessment approaches adopted by different local authorities in line with the Blue Badge Scheme Local Authority Guidance published by DfT in January 2008. In light of the spending reviews taking place in local authorities across England, this required due consideration of the different geographic and organisational contexts of different local authorities, as well as focusing on the quality of decision-making and the cost effectiveness of different approaches.

¹ DfT (2011) *Blue Badge Centre of Excellence Programme Evaluation Report*.

Study approach

The review included a wide range of activities including:

- In-depth case studies of administration and eligibility assessment practices in 33 local authorities, including the eight Blue Badge Centres of Excellence (CoEs)²;
- In-depth analysis including cost modelling of alternative administration and assessment approaches using data gathered from the case studies;
- A series of stakeholder workshops with a wide range of local authority and other stakeholder organisations;
- Three pilot studies that tested and evaluated promising new eligibility assessment approaches;
- Focus group discussions with Blue Badge holders and the Disabled Persons Transport Advisory Committee (DPTAC) to establish their views; and
- Drafting of good practice guidance for local authorities based on the findings of the research.

Throughout the review the research team used the following criteria to define good practice, as agreed with DfT at the beginning of the project:

- Fairness and consistency in respect of the treatment of Blue Badge applicants;
- Customer-friendliness and clarity;
- Speed and efficiency (including cost-effectiveness); and
- Resistance to abuse.

Our Conclusions

Publicity and information about the Blue Badge Scheme

Publicising the Blue Badge scheme at a local level is part of the wider information dissemination function that local authorities undertake on a range of services for which they are responsible. Despite this, many authorities do not actively publicise the Blue Badge scheme, which contributes to a perception among some badge holders that it is 'hidden' to prevent too many people from getting a Blue Badge. Our research highlighted that the key information requirements of Blue Badge applicants and badge holders are:

- The Blue Badge eligibility criteria, to help inform applicant's decision to apply.
- How to apply for a badge, to improve the clarity of the scheme for applicants.
- What constitutes correct use or misuse of a badge, to reduce cases of inadvertent Blue Badge misuse and abuse; and
- Where Blue Badge holders can park and how the scheme is enforced - to reduce the uncertainty reported by badge holders in respect of local parking rules and the frustration associated with unexpected penalty charge notices.

We advocate that local authorities develop coherent communication strategies that consider how best to reach the local target audience for Blue Badge information, and set out how information

² The Blue Badge CoE programme evaluation was conducted alongside this good practice review, but has been reported separately. This document identifies good practices associated with the enforcement of the Blue Badge scheme, and can be downloaded from the Blue Badge section of the DfT website.

about the scheme will be made available locally: in print, online, by telephone and through contact/customer-service centres. The two DfT leaflets '*Can I get a Blue Badge*' and '*Blue Badge Scheme Rules and Responsibilities*', which provide detailed information about the scheme, are available for local authorities to download free of charge from the DfT website for use when designing their local information.

Quick wins for local authorities on Blue Badge Scheme publicity and information:
<ul style="list-style-type: none"> • Signposting the Blue Badge scheme from other relevant local authority services
<ul style="list-style-type: none"> • Developing clearly presented written information about the Blue Badge scheme in easy to comprehend language, and with due consideration of the needs of different community groups and those with specialised information needs
<ul style="list-style-type: none"> • Establishing clearly presented and thoughtfully designed Blue Badge web-pages
<ul style="list-style-type: none"> • Providing disability and equality awareness training for all members of staff who regularly deal with applicants and Blue Badge holders

Further detail on the topic of publicity and information about the Blue Badge Scheme can be found in Chapter 3 of the accompanying final report on the good practice review.

The application process

Blue Badge application processes (and specifically the application form) are heavily informed by the eligibility assessment practices adopted by a local authority. Desk-based and independent mobility assessment practices require more detailed application forms, and such local variations in assessment practices mean that a standardised Blue Badge application form will need to be carefully designed if it is to be of relevance to all the Blue Badge issuing across all local authorities in England. Alongside the June 2011 Scheme Guidance we believe the standardised application form being developed through the Blue Badge Improvement Service (BBIS) will help to accelerate the common adoption of sound eligibility assessment practices and procedures. However, there does appear to be some benefit to both local authorities and applicants of having several distinct application forms for the various Blue Badge eligibility pathways. The model application form we developed for inclusion in updated Blue Badge scheme guidance is modular, thereby enabling local authorities to select the sections or individual questions that are consistent with their local eligibility assessment practices in the short term, and can be used to inform the BBIS online application form design.

We found that a number of local authorities in our sample are inadvertently operating outside of the Data Protection Act, 1998, by applying secondary uses to applicants' sensitive personal data without seeking their consent to do so. The model application form we developed as an output of our review contains updated declarations that can be used to secure explicit consent from Blue Badge applicants for secondary use of their sensitive personal data (information sharing) and to indicate they will comply with the application procedures of the local authority. Extra declarations on Blue Badge fraud and misuse are also included which may benefit local authorities.

Most applications are currently received on paper forms, but telephone, online (downloadable forms) and in-person practices are increasingly common. Ideally, we believe local authorities should make several of these options available to ensure they offer equitable access to the Blue Badge schemes and stress they need to be supported by robust eligibility assessment practices.

Based on our experience of piloting a Blue Badge application form with existing Blue Badge holders, we strongly recommend that local authorities that seek information from applicants about

their walking ability (e.g. to inform a desk-based assessment, or for cross-referencing in an IMA) should ask a combination of qualitative and quantitative questions about an applicant's walking ability to inform subsequent assessment.

Quick wins for local authorities on the Blue Badge application process:
<ul style="list-style-type: none"> • Including information about who is likely to be eligible for a Blue Badge at the beginning of the application form, and a reminder checklist at the end of the form
<ul style="list-style-type: none"> • Including questions that ask for detailed information about the applicant's disability and mobility difficulties in the application form, to allow you to make informed decisions with regard to their eligibility
<ul style="list-style-type: none"> • Producing more detailed notes for the applicant to read if they are seeking further information about the eligibility criteria or Blue Badge scheme
<ul style="list-style-type: none"> • Making the Blue Badge application form available as a downloadable file, which can save up to 25% of the costs associated with printing and distributing application forms
<ul style="list-style-type: none"> • Requiring a 'without further assessment' applicant's proof of eligibility to be dated within the last 12 months and including contact information for DWP/ Service Personnel and Veterans Agency in the Blue Badge application form and guidance notes
<ul style="list-style-type: none"> • Incorporating robust information-sharing declarations, such as those included in the updated model application form, in application forms in order to unlock access to relevant existing records held by the Council in relation to Blue Badge applicants
<ul style="list-style-type: none"> • Providing support to applicants who need help with completing the Blue Badge application form, for example over the telephone or in-person?
<ul style="list-style-type: none"> • Implementing fast-track application process for people who have a terminal illness which affects their mobility, to make the final weeks of their life easier?

Further detail on the topic of the application process can be found in Chapter 4 of the accompanying final report on our Blue Badge good practice review.

Organisational badges

We advise local authorities that the wide range of different types of organisation that receive and use a Blue Badge when caring for disabled people, who would meet one or more of the qualifying criteria for a badge, means that local authorities must draw on the scheme legislation, regulations and available guidance to make their own informed decisions based on local understanding of an organisation's circumstances.

Some local authorities have developed their own explicit guidelines (e.g. minimum of 10 care recipients per qualifying organisation, or 1 badge per 15 disabled residents in a residential care home, provided they would themselves qualify for a Blue Badge). These offer practical examples of how local authorities with an understanding of the local provision of care services for disabled people can reach informed decisions about the eligibility of organisations when they apply for a Blue Badge, and the number of badges that are awarded to successful applicants. Based on case study examples from our study, it may also be relevant to inform unsuccessful organisations (who did not care for a sufficient number of qualifying disabled people) that individuals they care for are able to apply for an individual Blue Badge, which could be used to aid their transportation, if they are successful in their application.

Quick wins for local authorities on Organisational Blue Badge practices:
<ul style="list-style-type: none"> • Developing a separate organisational Blue Badge application form based on the organisational badge questions in the model form (Technical Annex 5)
<ul style="list-style-type: none"> • Developing defined local criteria for the award/refusal of organisational Blue Badges based on due consideration of the regulations and DfT scheme guidance, and local understanding of the organisations that have a genuine need for a Blue Badge
<ul style="list-style-type: none"> • Including declarations in the organisational Blue Badge application form as a means of raising awareness of penalties for fraudulent claims and Blue Badge misuse/abuse.
<ul style="list-style-type: none"> • Conducting site visits to the premises of organisational Blue Badge applicants in order to verify claims they have made in their application forms

Further detail on the topic of organisational badges can be found in Chapter 5 of the accompanying final report on our Blue Badge good practice review.

Determining the eligibility of individual applicants under the ‘subject to further assessment’ walking criterion

We found compelling evidence that intelligently combined cross-checking, desk-based assessment and IMA approaches offer a substantially more robust, and lower cost, Blue Badge eligibility assessment practice (for applicants applying under the ‘Subject to further assessment walking criterion’) than assessments made by an applicant’s own GP. Focus group discussions with Blue Badge holders also revealed support for this approach provided it was delivered by an appropriately qualified healthcare professional.

Comparing our case study local authorities revealed that IMAs deliver average assessment cost savings of 30% against the use of GP assessments and result in lower Blue Badge award rates (70%) compared to where GP assessments are used (95%). IMA approaches yielded lower appeal rates among unsuccessful applicants (20% compared to 39% for GP assessments). They also resulted in fewer successful appeals (21% compared to 28% for GP assessments), which suggests IMA practices are more accurate. IMAs also accelerate the application process to 1-3 weeks from the local authority receiving a completed application form compared with 3-6 weeks where GP input is sought. We learned that an appropriate caseload level for Blue Badge assessors is 7-8 applicants per day, based on an average of 30 minutes to complete an assessment and 10 minutes for the assessor to report their recommendations. Our case study example from Shropshire Council, where assessment centres are run at a district level, shows it is possible for more rural or two-tier local authorities to establish IMAs in place of GP assessments.

Our pilot to validate the ‘core principles’ of desk-based assessment against those developed for IMAs revealed that desk-based assessments are valid tools for filtering out applicants that need to be referred for an IMA, and as a means of awarding and refusing some Blue Badge applications. The piloted desk-based assessment tool was 91% accurate compared to the core principles IMA practice, and offered a ‘lower margin for error’ than free-form desk-based decision-making using only the eligibility criteria and local authority scheme guidance (and not the desk-based assessment tool) to review each applicant’s self-reported information – particularly when used by staff members who are not healthcare professionals. The accuracy of the desk-based assessment tool was found to be heavily reliant upon applicants fully completing the application form, which emphasises the importance of local authorities returning incomplete application forms to

applicants for them to provide missing information so as to improve the accuracy and consistency of Blue Badge eligibility decisions.

Desk-based assessment tools are also particularly useful for local authorities which handle high volumes of Blue Badge applicants (e.g. more than 10,000 per annum). We calculated that intelligently combining the piloted IMA and desk-based assessment approaches based on these 'core principles', local authorities would, on average, save almost £7,500 per 1,000 applicants against sending every applicant for an IMA (36% cheaper), and almost £18,000 per 1,000 applicants against the cost of referring every applicant to their own GP (60% cheaper). Enabling assessors to recommend whether an applicant should be reassessed if they choose to renew a badge could reduce future costs by around £4,200 per 1,000 applicants each renewal cycle.

A number of benefits for local authorities and Blue Badge applicants emerge through joint assessments, including reducing the number of overall assessments and reducing the amount of time that applicants have to spend being assessed. Manchester City Council's approach of integrating Blue Badge eligibility assessments with those undertaken for mobility aids and home adaptations demonstrated that the great majority (90%) of people who underwent at-home social care assessments were already in receipt of a Blue Badge. As such, the process of joining up eligibility assessments in this way was calculated to save a modest £1,500 per annum (£9.42 per badge issued following a social care assessment) when compared to the cost of these individuals applying separately for a Blue Badge.

We identified scope for local authorities in close proximity to work together to deliver Blue Badge eligibility assessments, and note this would work particularly well in London and the Metropolitan areas. We also highlighted how the lack of dedicated Blue Badge eligibility assessment guidance and bespoke training is a significant shortcoming, and a barrier to the consistent uptake of IMA and desk-based assessment practices. A number of practices identified through this review were deemed unsatisfactory on the basis they were inequitable, inconsistently applied, or delivered inaccurate eligibility assessment outcomes. Such practices included accepting 'proxy' proofs of eligibility for the HRMCDLA and WPMS benefits (such as Vehicle Tax Excise Duty exemption certificates or Motability Finance agreements), refusing Blue Badges to people solely on the grounds they are able to use public transport, adopting desk-based assessments without any recourse to an IMA, and only offering IMAs when an applicant appeals against a refusal.

Based on the case study local authorities, our findings indicate the real cost to local authorities of delivering the Blue Badge scheme in line with current guidance is approximately £30 per applicant. This covers both assessment and administrative costs.

Quick wins for local authorities on the eligibility assessment process:
<ul style="list-style-type: none"> Establishing the ability to cross-check existing Council records to seek evidence of applicants' eligibility for a Blue Badge under the 'subject to further assessment' criteria
<ul style="list-style-type: none"> Adopting a desk-based assessment tool that has been designed with input from appropriate healthcare professionals with experience of conducting Blue Badge mobility assessments, and which is primarily used to filter applicants that do/do not need to be seen in person for a mobility assessment.
<ul style="list-style-type: none"> Joining-up Blue Badge eligibility assessments with those for other relevant concessions such as Concessionary Travel passes, Taxi Cards, home adaptations and social care
<ul style="list-style-type: none"> Allowing the healthcare professionals that conduct in-person mobility assessments to determine whether a successful Blue Badge applicant needs to be re-assessed when they next apply to renew their badge.

Further detail on the topic of determining the eligibility of individual applicants under the 'Subject to further assessment' walking criterion can be found in Chapter 6 of the accompanying final report on our Blue Badge good practice review.

Administering the scheme after assessment

We found that many local authorities offer appeals procedures for unsuccessful applicants. The best examples set out their appeals procedures clearly in a detailed feedback letter that explained why the applicant had been unsuccessful and outlined how they could initiate an appeal against their decision, and the timescale in which they needed to act. By an **appeal**, we refer to the practice of allowing unsuccessful Blue Badge applicants to either register a **complaint** about the way their application was handled (e.g. if they were dissatisfied with the procedures used by the local authority), or request a **review** of their decision because they feel they have been wrongly refused a Blue Badge. Some local authorities had explicitly separated their appeals procedures in this way in order to improve the clarity of the process for unsuccessful applicants, and mitigate against unsuccessful applicants speculatively appealing every refusal decision.

It was common for local authorities to advise unsuccessful applicants that they cannot reapply for a Blue Badge in the next 3-6 months unless their mobility has deteriorated substantially. While there is no legal requirement for local authorities to do this, or offer an appeals procedure, we considered them both to be good practices because they help to ensure badges are awarded fairly and consistently to those people who meet the eligibility criteria and limit repeated speculative applications from unsuccessful applicants. We found that offering an appeals procedure costs a local authority an average of £3,000 to £5,000 per annum, which is considered to represent good value in the context of the overall cost to the local authority of administering the Blue Badge scheme, and the quality assurance it provides to Blue Badge issuing authorities and applicants.

Fundamentally, our case study evidence indicates that, contrary to the views held by some of the local authority officers, there is no overall increase in the number of 'subject to further assessment applicants' that appeal against an unsuccessful Blue Badge application when compared with the practice of accepting assessment by an applicant's own GP.

Issuing new, renewal and replacement Blue Badges in person was found to be a highly effective way of improving the resistance to abuse of the scheme, particularly for local authorities in urban areas, or where a network of contact/customer service centres has been implemented. Sound information management systems are required to support this practice, and are also essential if renewal reminders are to be issued and if the authority wishes to share information with parking enforcement teams in their local authority/neighbouring local authorities.

Quick wins for local authorities on administering the scheme after assessment:

- Detailed refusal letters which explain why an individual's Blue Badge application was refused, with specific reference to the relevant Blue Badge eligibility criterion
- Indicating in writing that an applicant can appeal a refusal, and offering unsuccessful applicants up to 28 days to express their intention to appeal a local authority's decision
- Distinguishing between a 'review' of the local authorities decision, and a 'complaint' about the local authority's practices when handling appeals
- Clearly identifying the name of the Blue Badge issuing authority and a contact number that parking enforcement officers can call if they suspect a badge is being misused or abused in another local authority area
- Issuing renewal reminders approximately 3 months before Blue Badges expire

Quick wins for local authorities on administering the scheme after assessment:
• Issuing new, renewal and replacement Blue Badges in-person to an applicant
• Including reminders in death registry packs to encourage the return of Blue Badges
• Recording the detail of deceased badge holders using updates from local authority registrars
• Requiring a police crime/lost property reference number from applicants reporting a badge as stolen or lost

Further detail on the topic of administering the Blue Badge scheme after assessment can be found in Chapter 7 of the accompanying final report on our Blue Badge good practice review.

Enforcement and tackling abuse

Given this review's primary focus on Blue Badge scheme administration and assessment practices, the strongest conclusion emerging on enforcement is that robust administrative and assessment practices have a substantial role to play in improving the resistance to abuse of the Blue Badge scheme. By making sure that Blue Badges are only awarded to individuals who meet the eligibility criteria, and preventing opportunities to fraudulently obtain genuine Blue Badges from local authorities, the need to proactively enforce the scheme on-street is lessened.

We found strong evidence that the scale of abuse, and therefore the need for effective enforcement practices, is proportional to the perceived value of the Blue Badge in a particular area; and that London appears to show the highest levels of abuse which we believe reflects scarcer, more expensive parking and the London Congestion Charge. The most commonly used on-street enforcement practices are a combination of vigilance (on-street personnel), technology (instant data access), collaboration (with the Police), ability to take action (issuing of penalties) and deterrence (media liaison and publicity).

A particular challenge for Blue Badge enforcement is balancing the need to make data instantly (or readily) accessible to local parking enforcement officers when required, but also protecting sensitive personal data about Blue Badge applicants. However, good lines of communications between on-street enforcement officers and back-office administration staff can overcome this, with administrative staff 'looking-up' Blue Badge records on demand for enforcement officers.

The net result of variable enforcement activities is that those who seek to abuse or misuse Blue Badges fare differently depending on the area in which they offend, with direct consequences for the integrity of the scheme as a whole. For local authorities in urban areas there is some merit in promoting the cost:benefit approach that Wandsworth Borough Council adopted as a means of ensuring their Blue Badge enforcement activities are revenue-neutral. If such an approach were widely adopted it could help to ensure that a proportionate amount of Blue Badge enforcement activity, representative of the extent of Blue Badge misuse, abuse and fraud in each area, is undertaken in urban areas. We note that in rural areas, where there is less pressure on disabled parking bays, and parking assists in general, this may be a less appropriate model to follow.

We found that the majority of local authorities that do proactively enforce the scheme tend to focus on their enforcement successes. Such authorities reported this practice had been successful at raising awareness of the Blue Badge Scheme's rules, and gained the local authority kudos with eligible badge holders for tackling the issue of Blue Badge misuse and abuse.

Further detail on the topic of enforcement and tackling abuse can be found in Chapter 8 of the accompanying final report on our Blue Badge good practice review.

Supporting change in local authorities

Given the reforms to the Blue Badge scheme announced by the coalition Government on 14 February 2011 and planned changes to legislation over the coming 2 years, we identified a need for a culture of continuous improvement and change-management in local authority Blue Badge teams, supported by regularly communicated updates to good practice guidance and scheme updates. We note there may be a future role for DfT in terms of coordinating these activities to ensure that desirable practices, in keeping with a sound interpretation of what constitutes 'good practice' delivery of the Blue Badge Scheme, are being adopted by local authorities within the context of their local circumstances.

All local authorities would benefit from regular data collection and monitoring of their delivery of the Blue Badge scheme using the indicators set out in Appendix C to this report. Not only would this process facilitate easier submission of annual statistics to DfT, but it would help to inform evidence-based decision making within a local authority – thereby helping decision-makers to identify opportunities for service improvement and cost/efficiency savings.

Further detail on supporting change in local authorities can be found in Chapter 9 of the accompanying final report on our Blue Badge good practice review.

Recommendations

Based on the key conclusions from our good practice review we make the following recommendations to DfT, which are structured around the objectives of our research brief.

Helping local authorities to adopt improved administration and assessment practices

Further guidance in relation to specific Blue Badge scheme processes would help the adoption of improved practices. Most notable of these is the adoption of robust eligibility assessment practices for applicants under the 'subject to further assessment' walking criterion. We recommended that updated Blue Badge scheme guidance should take a 'WebTag' style and appear online in modular format so that it is easy for local authority officers to digest, and can be readily modified and updated by DfT when changes are made to legislation and regulations underpinning the scheme. This also opens the guidance up to continual improvement based on practice feedback from the local authorities charged with adopting and implementing the Blue Badge reforms.

Given the relatively high cost of developing and maintaining online application tools, we do not believe it makes financial sense for the 152 Blue Badge issuing authorities to each develop them individually, particularly as DfT is currently working with local authorities to establish a common service delivery project. The Blue Badge Improvement Service (BBIS) should be available in 2012 and will include, among other facilities, an on-line application facility for members of the general public through DirectGov. We recommend DfT explores the scope for this online application system to build in:

- Cross-checks with DWP and Service Personnel Veterans Agency benefit records.
- Scope for local authority administrative staff to use the system to input paper and telephone applications.
- View-only access for in-street enforcement officers trying to detect misuse and abuse.

Alignment of Blue Badge walking criterion and the walking element of the Higher Rate Mobility Component of Disability Living Allowance

We recommend against formally aligning the Blue Badge walking criterion with the walking element of the Higher Rate Mobility Component of Disability Living Allowance (HRMCDLA), mainly because of proposed major reforms to Disability Living Allowance. The local authorities we interviewed through the study indicated that it was the practical focus of the assessment criteria for the walking element of the HRMCDLA criterion they appreciated, rather than necessarily the fact that the assessment criteria was derived from DWP guidance. As such, our recommendation is that updating the assessment criteria for the Blue Badge 'subject to further assessment' walking criterion can be best achieved by:

- De-coupling the Blue Badge walking criterion from the walking element of HRMCDLA in updated DfT Blue Badge scheme guidance, since there is no basis for this in current legislation.
- Including a more practically focused set of core eligibility assessment principles in updated DfT Blue Badge scheme guidance which have been developed and piloted through this review by local authority practitioners and expert advisers based on good practices which emerged in respect of assessing applicants for eligibility under the Blue Badge walking criterion.
- DfT considering updating the secondary legislation that underpins the Blue Badge scheme to ensure greater uptake of IMA eligibility assessment practices based on the core principles identified through this research study.

We note that many local authorities remain unclear on the issue of what constitutes a 'permanent and substantial' disability. The most challenging aspect relates to the concept of permanency of disability, and whether this refers to individuals who are impaired 'all of the time' or whether it also covers individuals whose impairment 'will not go away', but impairs them intermittently. We recommend that DfT seeks to clarify this issue in updated guidance or future legislation.

Recommendations on good practice for assessing applicants under the Blue Badge walking criterion

The research team developed and piloted a set of core principles for Blue Badge desk-based assessments and mobility assessments that we recommend are included in updated scheme guidance to aid local authorities in adopting these practices. We also developed evidence-based case studies which emphasise that these practices are more robust and less expensive than prevailing practices of relying on evidence from an applicant's own GP to determine whether an individual is eligible for a Blue Badge. Our recommendation is that these are also included in updated guidance to demonstrate the value of adopting these practices.

We recommend DfT considers developing, or supporting, an approved training workshop aimed at Blue Badge administration staff and eligibility assessment staff. This could be based on identified core principles of desk-based assessments and IMAs to help local authorities adopt a consistent approach to determining the eligibility of Blue Badge applicants within their local circumstances, as well as providing a form of continuing professional development for these members of staff.

Recommendations on joint assessments

We recommend that, wherever possible, local authorities should be encouraged to join up their Blue Badge assessment practices and procedures with those for other locally administered

benefits and concessions. We found good examples of local authorities integrating their Blue Badge assessment practices with those for other concessions; including taxicards, concessionary travel passes, social care and adaptations in the home. Joint assessments reflect good practice, due to the strong customer service benefits and modest cost savings they deliver for local authorities. We have drafted a dedicated section of guidance on joint assessments, accompanied by case study evidence and pilot study findings and recommend it is included in updated DfT scheme guidance.

Measuring and monitoring success in Blue Badge Scheme delivery across England

We strongly recommend the adoption of a systems-thinking approach within local authorities in order to monitor and evaluate the impact of changes to local systems for delivering the Blue Badge scheme. To aid this we have developed an evaluation protocol and set of indicators which can be used to measure and monitor the outputs and outcomes of the move to IMAs in both the short and the long term.



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