

Scrutiny Review: Blue Badges and Supporting Better Access to Parking for Disabled People

**A Scrutiny Review by the Environment and Community Safety
Scrutiny Panel
2019/20**

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CHAIR'S FOREWORD

The remit of the Environment and Community Safety Scrutiny Panel is such that the options for reviews to focus on, issues to unpick and policies to test are almost innumerable. As Chair, working with my colleagues, I wanted to ensure that we focused on issues of importance to the community, issues that affected the lives of our people and issues where we could deliver real change. That vision remains my priority and will do so every day I serve as a Councillor here in the London Borough of Haringey.

There are many responsibilities of the Council to the people who live, learn and work in our community. Among those important responsibilities to the people of Haringey is the fight to ensure that our Borough – east and west – is accessible, inclusive, safe and welcoming.

Those aims and objectives underpin why we chose to look at the issue of disabled bays and Blue Badges. The application process, used by many residents in our Borough, have long been inefficient, inaccessible and in some cases, not fit for purpose. A Cabinet level decision was made in early 2019 to review a range of parking related issues in line with the new Transport Strategy. Our panel wanted to play our part and engaged with the review in as open and reflective a way as possible. At a meeting of our panel in April 2019, we heard from members of the public, officers of the council, relevant stakeholders and many others that action was needed on disabled bays and blue badges.

Since then, we have met with and seen first hand the processes and structures in London Boroughs across our capital city. We have brought residents into the Council to share their experiences, to explain their thoughts and to work together to develop a set of recommendations that will deliver real and meaningful change. And we have met with representatives of community organisations, disability charities and other bodies relevant to this matter.

The Panel is grateful to the Cabinet Member for taking the time and effort to listen to our deliberations and work constructively with us over recent weeks and months. The progress made on dedicated disabled bays that went to Cabinet in September 2019 is the first step to delivering real change and we will continue to monitor this important area in the coming weeks and months.

The real change proposed in our review will lead to a better deal for disabled people, and those who require assistance with their mobility, so that they are able to go about their day-to-day life without obstruction or inconvenience. This is an important report that deserves to be taken seriously and we have put together a set of recommendations that I hope will receive full support from the Cabinet.

I would like to thank Philip Slawther, our Clerk, for his work and support. Those thanks are extended to all the officers here at the London Borough of Haringey who have assisted us from the start of the process to the publication of this review.

Lastly, I would like to thank my colleagues on the Panel. It has been a useful, interesting, challenging and motivating experience and I am grateful to Cllr Eldridge

Culverwell, Cllr Scott Emery, Cllr Barbara Blake, Cllr Peray Ahmet, Cllr Julie Davies, Cllr Julie Ogiehor and Ian Sygrave for their individual, and combined, contribution.

Councillor Adam Jogee

Labour Member for Hornsey

Chair, Environment and Community Safety Scrutiny Panel

RECOMMENDATIONS:

1. Cabinet to give consideration as to how future Scrutiny Reviews could be best supported and common timelines agreed that allow Scrutiny to carry out its investigative work fully.

Disabled Bays and Provision of Dedicated Disabled Bays

2. That Cabinet undertake to monitor the implementation and conversion of dedicated disabled bays going forward, with particular focus on the impact on the overall availability and distribution of disabled parking bays.
3. That Cabinet reconsider the eligibility criteria for disabled bays and the use of automatic entitlement based upon whether the person is in receipt of higher rate/enhanced rate benefit payments.

Applying for and renewing a Blue Badge

4. That Cabinet undertake to explore ways of ensuring that online payments can be made for Blue Badges. At present the £10 administration fee can only be paid via cheque which causes unnecessary delays. This may require engaging with the DfT and seeking changes to the government website. It is suggested that Local Members of Parliament could be engaged on this issue and their influence sought.
5. That provision be put in place for Blue Badge applicants to be able to speak to the Concessionary Travel team directly.
6. That Cabinet explore ways in order to make the process of applying, renewing and being assessed for a Blue Badge more streamlined and less disjointed. Specifically, the Panel would like Cabinet to consider:
 - Whether regular updates could be provided to applicants on the status of their application?
 - Whether this could be automated?
 - Ensuring that applicants can upload documents online.
 - That provision of an automatic renewal reminder email/letter to Blue Badge holders at the appropriate point, be explored?
7. That the Cabinet Member should have a greater oversight of the overall process from start to finish. The Cabinet Member should receive regular performance monitoring updates from the different areas and an action plan should be developed to improve monitoring and ensure delays are minimised.
8. That the Cabinet Member undertake to arrange a quarterly strategic partnership forum with key stakeholders, including the Council, the Whittington, Police and DfT to ensure that the overall journey is streamlined and made more accessible. This

would also provide a partnership forum to address Blue Badge related crime as per Recommendation 11.

Enforcement and Blue Badge Related Crime.

9. That the Council should prioritise tougher enforcement of Blue Badge fraud in order to ensure that those with genuine mobility issues are able to use their vehicles. Training should be provided for Enforcement officers and processes put in place so that any Blue Badge identified by a CEO was inspected and the badge holders' details cross referenced with the back office for possible misuse. The Panel heard evidence from Bromley that this could take as little as 30 seconds.
10. Consideration should be given to how the Council, working with police and partners, could support the rollout of theft prevention devices for Blue Badges. The Panel received evidence that these were particularly effective and cost between £30 & £40. Cabinet should consider whether providing these was cheaper than the administration costs associated with replacing a stolen Blue Badge.
11. That the Council works closely with the police to reduce proliferation of Blue Badge related crime. The Panel received evidence that Blue Badge theft from vehicles has risen over 600% in the last three years. It is suggested that the Community Safety Partnership could examine this issue as part of its work programme for 2020/21.
12. That the Council explores the feasibility of issuing virtual permits instead of Companion Badges. Cabinet should also ensure that provision of paper applications is retained on some level in order to ensure residents without access to IT are not unduly disadvantaged.
13. The Cabinet Member should engage with other Boroughs that have implemented virtual permits to see what lessons can be learnt. Engagement should also be sought with the Mayor's Office and London Councils to encourage adoption at a pan-London level and explore the feasibility of having a more integrated system across London.

Correspondence and Communications

14. That a commitment is given that the Council will carry out a review of the letters and communications that it sends to residents to ensure that they are clear, courteous and without the use of intimidating language.
15. That the Council implement provision for residents to report disabled bays that were no longer in use and that processes are put in place for adequate monitoring of disabled bays and whether they were being used. Once a bay is identified as being unused there should be a clear timeline for its removal. A campaign should

be launched through Haringey People and our website to “report an unused disabled bay”.

16. That the Council should send out a booklet of key information to residents as soon as they are assessed as needing a Blue Badge.
17. That the Council explore ways in which an automatic reminder could be issued, along with the existing information given to the next of kin, to cancel a Blue Badge when a death is registered.
18. A communications campaign should be implemented across the Blue Badge agenda which clearly sets out the Council’s enforcement message. It is suggested that disability access representatives and the Council’s Equalities Steering Group should be involved in developing this campaign and that consideration should be given to highlighting awareness around the fact that not all disabilities are visible.

Health Assessments for Blue Badges

19. That consideration should be given on to how to minimise delays within the assessment process, including ensuring that assessment bundles can be transferred to Stuart Crescent electronically.
20. It is recommended that, the Council should work with Stuart Crescent Health Centre to ensure that the current 5 minute deadline for late arrivals was extended and a greater degree of flexibility afforded to applicants, given the mobility levels of the people being assessed and the lack of available parking facilities. Cabinet should work with the Whittington Trust to ensure that residents were provided with an alternative date when an appointment was missed.
21. That Cabinet ensures that monitoring of the current 23 day timescale for applications to be processed is undertaken. That Cabinet also explores recommissioning of the current contract to provide assessments for discretionary Blue Badge applications as it was last done over 10 years ago. The Panel recommends that consideration is given to commissioning additional providers for the assessment process for greater flexibility and distribution across the borough. The Council should explore ways of ensuring that that residents have a choice of which centre they attend and that there is some provision in the west of the Borough as well as in Tottenham. The Panel suggests that recommissioning this service could potentially provide an opportunity to speed up the assessment process and minimise delays.

1. Background

Introduction

- 1.1 The Panel were approached by the then Cabinet Member for Environment and the Interim AD for Environment and Neighbourhoods, who outlined proposals for the service to review a range of parking related issues in line with the Transport Strategy. The Parking Service were looking at updating a range of policies and operational practices as part of this. The impetus was a combination of a widening of existing Blue Badge eligibility criteria and opportunities arising from a scheduled upgrade to the Council's Civica IT system for parking, which would support additional online payment opportunities and maximise recovery of income from Parking Control Notices (PCNs). As part of this programme of work, it was felt that there were a number of opportunities for Scrutiny to be involved in a policy development role. Most Scrutiny Reviews are retrospective in nature and the Panel welcomed the opportunity to feed into an emerging policy area.
- 1.2 At its meeting on 30th April 2019, the Overview and Scrutiny Committee agreed to set up a review that looked into how the Council could provide better access to disabled parking services, with a particular focus on Blue Badge provision. During the Scrutiny Panel meeting on the 8th April 2019 the Panel undertook a discussion around parking services and some of the barriers faced by disabled people in accessing these services. The Panel heard from members of the public, majority and minority group Councillors and the Cabinet Member on this issue. The Panel received evidence that the process of getting a Blue Badge could be long and involve dealing a number of different agencies. This evidence reinforced some of the concerns that the Panel Members had come across through their individual surgeries and case work. Following the discussion at the April meeting of the Environment and Community Safety Panel, it was felt that there was a real need for a review of current processes and scope to make recommendations on how these could be improved.
- 1.3 One of the key issues that was highlighted at this stage was around the problems that some residents had experienced with getting a replacement Blue Badge in the eventuality that it was either lost or stolen. The Panel were keen to understand what could be done to speed this process up. Throughout the evidence gathering process for this review it was made clear that for many residents, having a Blue Badge, and the improved accessibility it afforded, could be life changing. The Panel were keen to hear from a range of stakeholders to better understand the problems that existed and evaluate where improvements could be made.

Scrutiny and Cabinet

- 1.4 Following Annual Council in May 2019, the portfolio holder for parking services changed and the Cabinet Member for Neighbourhoods became responsible for this area. The Cabinet Member for Neighbourhoods had given evidence to the Scrutiny Review and was engaged with the issue from the outset. The Panel would like to thank the Cabinet Member for Neighbourhoods for her contribution to this review, both as a backbencher and as the Cabinet Member and the level of support and enthusiasm that she has showed towards the issues raised.

- 1.5 Following a number of the evidence gathering sessions, the Cabinet Member made clear that she was keen to progress some of the issues that had been identified and was concerned that the scrutiny process was taking longer than she would have ideally liked. At this juncture the Cabinet Member took a decision that, rather than wait for the conclusion of the Scrutiny Review, she would seek to bring an initial phase of service improvements through the Council's Cabinet and that the recommendations of the Scrutiny Review would help inform subsequent stages of the wider operational review. The initial phase of changes to existing service provision were focused on the introduction of a dedicated disabled bay scheme and a upgrade to the Civica Parking Management IT System to underpin further improvements to the parking infrastructure in the future.
- 1.6 The Panel are aware that some of the proposals were time sensitive, particularly in respect of the expiry of the existing Civica contract. The Panel also recognise that this is a long-term process and that the reports that went to Cabinet in September 2019 set out the wider strategy and vision for the years ahead. The Panel understands the Cabinet Member's desire to bring about improvements and do to do so within a defined time period, but believe that the introduction of dedicated disabled bays was done without the Scrutiny Panel having completed its review of this scheme and without adequate opportunity to speak to other boroughs that had introduced similar schemes. The scheme has a cost implication to the Council and the Panel would have liked further opportunity to assure itself of the merits of introducing a dedicated a disabled bay scheme and to understand how and where this has been successful.
- 1.7 The Panel would like to see a close working relationship between Cabinet and Scrutiny and that both elements continue to explore opportunities to work in conjunction with one another and that there is a continued role for, and involvement in, policy development for Scrutiny.

Recommendation:

That Cabinet give consideration as to how future Scrutiny Reviews could be best supported and common timelines agreed that allow Scrutiny to carry out its investigative work fully.

Aims of the Review

- 1.8 The Panel was mindful that that parking is a complex and wide ranging policy area. It was felt that the review was most likely to be effective if it focussed on Blue Badges as this was a vital area of parking policy for those with disabilities and could be a life line for vulnerable residents who relied on the independence and ability to undertake day-to-day tasks that it affords. The Scrutiny Review also looked into the issue of dedicated disabled parking bays and whether these should be offered to residents.

1.9 The review aimed to establish:

- What are residents' experiences of accessing and using a Blue Badge?
- How can the process of issuing Blue Badges and replacement Blue Badges be improved? What, if any, are the delays involved in the process?
- What is the current process around issuing of companion Blue Badges and the barriers involved;
- Should the Council offer designated disabled parking bays;
- How Haringey compares with other local authorities and what can be learned from their experiences;
- How could improvements be made to the written correspondence received by residents in relation to disabled parking services and Blue Badges;

Scope/Terms of Reference

1.10 The terms of reference for the review were as follows:

"To consider and make recommendations to Cabinet on what barriers exist in getting and using a Blue Badge? What are the experiences of disabled service users in accessing parking services, particularly Blue Badges and how and where improvements can be made?"

Sources of Evidence:

1.11 Sources of evidence were:

- Experience of residents and service users.
- Relevant data sources, including information on current Council processes and procedures.
- Research information.
- Performance information.
- Interviews with relevant key Council officers
- Disability access groups and voluntary sector organisations such as Disabled Motoring UK and Transport for All.¹
- Best practice within the sector

1.12 A full list of all those who provided evidence is attached as Appendix A.

Membership

1.13 The membership of the Panel is as follows:

Councillors: Adam Jogee (Chair), Peray Ahmet, Julie Davies, Eldridge Culverwell, Barbara Blake, Scott Emery & Julia Ogiehor.
Co-opted Members: Ian Sygrave (Chair of Haringey Association of Neighbourhood Watches).

¹ Transport for All were initially keen to be involved in the process but subsequently declined our invitation to give evidence.

2. Introduction

- 2.1 There are around 2500 Blue Badge applications and renewals a year in Haringey and approximately 2800 disabled bays. There are around 250 applications received a year and Parking Services introduce 50 new bays and remove 20 redundant bays every 3 months. Haringey offers a Companion Badge that can be used instead of the Blue Badge and was brought in to reduce Blue Badge theft. Disabled drivers are able to park using a Blue Badge or a Companion Badge. However, the Blue Badge is valid for use across the UK, whilst the Companion Badge is only valid within Haringey. Blue Badge holders and Companion badge holders are permitted to park in all permit and shared use bays and on yellow lines for up to three hours and free of charge. A Blue Badge is issued for three years before a renewal is required.
- 2.2 The process of applying for a Blue Badge is done through a government website. In Haringey residents can also make a paper based application through the Customer Service Centres. Haringey Customer Services also offer Digital Assistance for residents at its Customer Service Centre, which was originally set up to assist with Universal Credit applications but is being extended to all online transactions in support of the FOBO programme.
- 2.3 Applications for Blue Badges, either online or via a paper application, are assessed by Haringey Customer Services staff. Applicants are deemed to be eligible for automatic entitlement based on set criteria which, if met and payment is received, will result in a Blue Badge being processed on that day and the DfT usually issuing the badge within 7 working days. Including postage and delivery, this process can take up to 10 working days. If the applicant does not meet the automatic criteria then their application is considered discretionary and further evidence is requested or a physical assessment of their mobility is undertaken.
- 2.4 The criteria for Blue Badge eligibility is set externally by the Department for Transport and is not something the Council has control over. All boroughs use this criteria for Blue Badge applications. Local authorities are, however, responsible for organising the assessment for discretionary applications, based on DfT criteria, as well as the day-to-day administration and enforcement of Blue Badge schemes.

Blue Badge eligibility as set by the DfT² is based on:

- a) Entitlement without further assessment if at least one of the following applies (automatic entitlement):

² <https://www.gov.uk/government/publications/blue-badge-can-i-get-one/can-i-get-a-blue-badge>

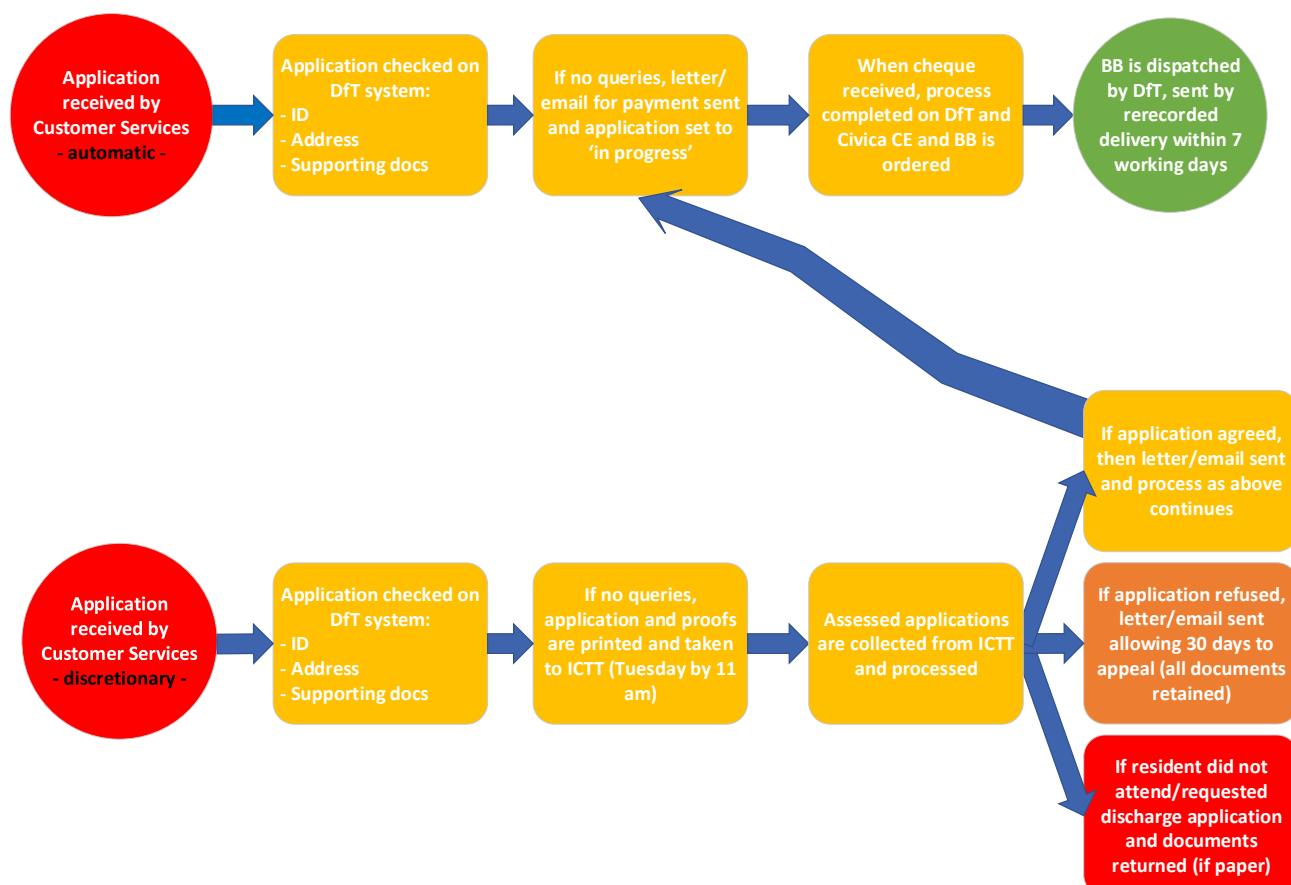
- In receipt of the higher rate of the mobility component of the Disability Living Allowance (DLA).
- In receipt of Personal Independence Payment (PIP) because you can't walk more than 50 metres (a score of 8 points or more under the 'moving around' activity of the mobility component).
- Registered blind (severely sight impaired).
- In receipt of a War Pensioner's Mobility Supplement.
- Receives a lump sum benefit within tariff levels 1-8 of the Armed Forces and Reserve Forces (Compensation) Scheme and have been certified as having a permanent and substantial disability which causes inability to walk or very considerable difficulty in walking.
- In receipt of the mobility component of PIP and have obtained 10 points specifically for descriptor E under the 'planning and following journeys' activity, on the grounds that you are unable to undertake any journey because it would cause you overwhelming psychological distress.

Or

b) Entitlement subject to further assessment. This is determined based on evidence and assessment. The DfT set out the following criteria:

- A person is unable to walk at all.
- A person is unable to walk without help from someone else or using mobility aids.
- A person finds walking very difficult due to pain, breathlessness or the time it takes.
- Walking is dangerous to their health and safety.
- A person has a terminal illness, which means they are unable to walk or find walking very difficult and have a DS1500 form.
- A person has a severe disability in both arms and drives regularly, but cannot operate pay-and-display parking machines.
- A person with a child under the age of 3 with a medical condition that means the child always needs to be accompanied by bulky medical equipment.
- A person with a child under the age of 3 with a medical condition that means the child must always be kept near a vehicle in case they need emergency medical treatment.
- A person struggles severely to plan or follow a journey.
- A person finds it difficult or impossible to control their actions and lack awareness of the impact they could have on others.
- A person regularly experiences intense and overwhelming responses to situations causing temporary loss of behavioral control.

2.5 Table 1. Application Process in Haringey for a Blue Badge - Automatic versus Discretionary process.*



*Discretionary assessments are carried out by Integrated Community Therapy Team (ICTT), which is part of the Whittington Trust.

Changes to the Blue Badge Scheme in June 2019

- 2.6 On 15th June 2019 the government released new guidance on Blue Badges which included changes to the eligibility criteria. These changes then came into force from 30th August 2019. Blue Badge eligibility criteria was extended to include hidden disabilities and includes people who are unable to walk as part of a journey without considerable psychological distress or the risk of serious harm. The expanded scheme coincided with the launch of a new task force to toughen up enforcement of the scheme and prevent misuse. To date, very little progress seems to have been made in relation to this task force.
- 2.7 In announcing the new guidance, the government set out that this was the biggest change to the scheme since its creation in the 1970s. The Panel received evidence from DMUK that a significant uptake in Badges was anticipated as a result of these changes. A funding pot of £1.7m was set up by the government to help councils with the expected increase in applications.

However the funding is only available in the in the first year of the programme. If the expected uptake in applications is sustained over longer period, Cabinet may need to consider additional funding to support this.

3 Dedicated Disabled Bays

Dedicated Disabled Bays

- 3.1 Cabinet adopted dedicated disabled bays at its meeting on 10th September 2019. All new disabled parking bays that the Council installs, at the request of residents, as of January 2020 are for the sole use of the applicant. Each bay will be marked by an identifying number, which corresponds to the user's permit. If a non-permitted Blue Badge holder uses this bay then they will be liable to receive a Penalty Charge Notice (PCN). Residents will also be able to submit an application to have their existing disabled bay converted into a dedicated bay. The Council's Disabled Parking Place Policy sets out that the Council will continue to install Disabled Parking Bays in town centres and other places of interest that can be used by any holder of a Blue Badge.³
- 3.2 The Panel received significant evidence from a range of contributors as to the importance that access to parking can make to people with disabilities in allowing them to park near their home or place of work. Access to disabled parking ensures that residents with disabilities are able to use their vehicle to undertake a range of day-to-day activities. Conversely, without access to parking many residents are fearful of going out and using their vehicle for fear that they will be unable to park upon their return. For those with significantly reduced mobility and a diminished capacity to walk even short distances unaided, this is a source of significant anxiety. The importance of a Blue Badge and access to parking on the health and wellbeing of users should not be underestimated and a number of those who gave evidence to panel characterised it as an essential part of their lives.
- 3.3 The evidence we received from Disability Motoring UK set out very clearly that one of the main concerns for disabled motorists was around a lack of enforcement and lack of available parking. The vast majority of Blue Badge holders respect the scheme and use their badges appropriately. However, with the introduction of more lenient eligibility criteria for Blue Badges by the DfT in August 2019, it is anticipated that the demand on existing disabled bays would increase significantly. This additional pressure is likely to be exacerbated in London by sustained population growth. The Panel also received evidence that when marking out disabled bays authorities needed to be mindful of the additional room required by vehicles with a disability ramp and that the of placing more than two bays in a line should be avoided for this reason.
- 3.4 Overall, the Panel broadly welcomes the introduction of dedicated disabled bays and is cognisant of the impact these may have on the quality of life for an individual Blue Badge user. However, the Panel is also concerned that the ongoing conversion of disabled bays to be used by a specific person at a specific location will have a significant effect on the overall availability of disabled bays across the borough. Given the increasing demand pressures expected on disabled bays and parking spaces in general, the Panel is concerned that the move to dedicated disabled bays will place additional strain on a limited resource. A Blue Badge

³ <https://www.haringey.gov.uk/sites/haringeygovuk/files/disabled-parking-place-policy.pdf>

holder may be able to park their car outside their residence but they will also need available parking at the other end of their journey. The Panel notes the adoption of an 'Opt-in' approach, partly in response to similar concerns, but feels that most users will seek to utilise this service once it becomes widely known.

Recommendation:

That Cabinet undertake to monitor the implementation and conversion of dedicated disabled bays going forward, with a particular focus on its impact on the overall availability and distribution of disabled parking bays.

Appeals Process

- 3.5 The Panel welcomes the adoption of an appeals process for rejected disabled bays and some of the evidence it received during this Scrutiny Review related to the lack of an appeals process and a perception that the process could feel arbitrary. There was also a general lack of understanding from residents on the rules and criteria behind disabled bays and why, if you had a Blue Badge, you we're automatically entitled to a disabled bay. The Panel noted concerns about a lack of joined-up thinking on Blue Badges and disabled bays. There was a feeling among some of the contributors to this review that the process for applying for a disabled bay should be made easier, given the amount of evidence required when applying for a Blue Badge.

Disabled Bay Eligibility Criteria

- 3.6 Eligibility criteria for disabled bays is set by the Council but is based on the automatic entitlement for a Blue Badge set out in Paragraph 2.3 of this report. The Panel is broadly supportive of the Cabinet's decision to introduce an assessment process for those who do not qualify automatically, in as much as it is felt that criteria for automatic entitlement is not a suitable determinant on its own. The Panel is keenly aware of the fact that mobility should be a determining factor when it comes to eligibility for a disabled bay however, it is concerned by the fact that this is largely determined on receipt of enhanced rate disability benefits. The Panel are concerned that many people who require a disabled bay will not be in receipt of benefits and are also concerned about the age restriction for eligibility for PIP and the potential disadvantage that causes to those over the state pension age.
- 3.7 It is not felt that that the introduction of an assessment process similar to the one used for Blue Badges adequately addresses these concerns. Particularly as going through an assessment process will create additional delays to the application process as well as the additional time and resource pressures on already stretched services. The Panel feel that that the eligibility criteria should be amended so as not to be based on the extent to which a person receives benefits. Significant concerns exist about the government's handling of benefit entitlement and the inherent unfairness of this system. The Panel does not feel sufficiently assured that the current arrangements provide the necessary safeguards to protect disabled residents who are not in receipt of benefits.

Recommendation:

That Cabinet reconsider the eligibility criteria for disabled bays and the use of automatic entitlement based upon whether the person is in receipt of higher rate/enhanced rate benefit payments.

4 Applying for and renewing a Blue Badge

Process/Online Applications

4.1 When a resident contacts the Council about a Blue Badge the applicant is signposted to a government website in order to fill out an online application. The specific section of the gov.uk website that relates to Blue Badges is run by Northgate, an external supplier that the DfT have commissioned to manage this. In order to undertake the application process the following information is required:

- A recent digital photo showing their head and shoulders.
- A photo or scanned copy their:
 - Proof of identity (such as a birth certificate, passport or driving licence).
 - Proof of address (such as a Council Tax bill or government letter).
 - Proof of benefits (if you get any).
- The applicant also needs to provide:
 - National Insurance number.
 - Details of their current Blue Badge (if they're reapplying for a Blue Badge).

4.2 The Panel were pleased to hear from officers that residents could still make a paper application and that digital support in undertaking the online application was offered to residents at Customer Service Centres. The Panel felt strongly that paper applications need to be retained for those without access to IT or those without the requisite knowledge and skills to undertake an online application process and welcomed the assurances they received to that effect. The Panel broadly endorses a digital default approach and recognises that this is part of a wider reshaping of Customer Services through the FOBO programme, provided that this comes with the continued safeguard of paper copies being available as well.

4.3 The Council are responsible for the administration process of assessing eligibility and processing the application. As part of the online application process, applicants are requested to pay a £10 administration fee which goes to the Council to cover the cost of Customer Services staff processing and administering the Blue Badge. The £10 administration fee is the maximum allowed in England as set out in statute and the Panel received evidence that it was debatable whether £10 was sufficient to meet all of the costs of administering the badge.

4.4 The Panel were surprised to hear that the £10 administration fee for the application could only be done via cheque, which was made payable to the Council. It was felt that cheques were becoming increasingly obsolete and that this was entirely out of sync with having an online application process. A number of Panel Members remarked that they were unsure whether they even owned a cheque book. The Panel also received evidence that the use of cheques to make the payments caused significant delays to the process.

- 4.5 The online system used for processing applications was commissioned by the DfT and the fact that applicants can't make online payments in support of their applications may be largely outside of the Council's control. The Panel heard evidence that the Council had previously used its own system for Blue Badge applications and that this had included the facility to make online payments. The decision to migrate to the DfT system was taken on the basis of greater functionality. Incidentally, the Panel was advised that, apart from the lack of online payments, the DfT system was a significant upgrade on the previous system and was much easier to use.
- 4.6 As part of the upgrade to Civica it is anticipated that there will be significant opportunity to improve the Council's service offer and make it more user-friendly. The Panel welcomes plans to improve systems to avoid duplication and allow IT systems to 'talk' to one another. It is hoped that this will reduce the number of times residents are asked to supply the same information to the Council and reduce costs. It is anticipated that this will make processing new badges and renewals quicker and much easier for residents. However, a fundamental part of this is developing online payments for Blue Badges. The Panel was advised that if the online application process took online payments, application that met the automatic criteria would take approximately 10 minutes to process and then 7 working days for the DfT to issue the badge.

Recommendation:

That Cabinet undertake to explore ways of ensuring that online payments can be made for Blue Badges. At present the £10 administration fee can only be paid via cheque which causes unnecessary delays.

This may require engaging with the DfT and seeking changes to the government website. It is suggested that Local Members of Parliament could be engaged on this issue and their influence sought.

Improvements

- 4.7 The Panel would like to see a process whereby Blue Badge applicants received regular updates on the status of their application and that this could be automated, so as to minimise the impact on staff resources. The application for a Blue Badge can take up to six weeks and it is anticipated that generating automatic updates on the status of applications would close the feedback loop to residents and also reduce pressure on the Council's Customer Services.
- 4.8 One of the recurring themes from the evidence that the Panel received was around a lack of joined up services when it came to applying for a Blue Badge. The fact that the process involves both Customer Services and the Concessionary Travel team within the Council, which in itself can involve multiple phone calls, emails and even visits to the Customer Service Centre, as well as dealing with a DfT managed IT system and NHS primary care services is identified as a source of significant frustration for service users. The fact that the process involves dealing with multiple agencies leads to delays and applicants having to relay the same

information several times. It also increases the likelihood of documents being lost in the system. The Panel feels that there is significant scope to improve joined-up working in this area and that in an ideal world this would all be managed by one agency.

- 4.9 The Panel received evidence that a number of residents had experienced a situation where a Blue Badge holder had reported their badge stolen and had applied for a replacement but had still received a PCN from a Civil Enforcement Officer (CEO). Residents also reported significant problems when it came to uploading documents as part of the online application process. Uploading photos was often straightforward, but attempts to upload documentary evidence were often unsuccessful. This could require phone calls to more than one department or agency to resolve. The applicant is usually directed to send the missing information to the local authority by post or in person. A further example of the disjointed nature of the process is the fact that the Haringey website states that the process takes up to six weeks whilst the gov.uk websites advised that this can take up to 12 weeks.
- 4.10 The Panel heard evidence from Brian Leveson, who is a local resident and the parent of a severely disabled child. Mr Leveson emphasised the importance to the quality of life for his family that the Blue Badge provided, as well as the fragmented nature of applying for the badge and a perception that each service/agency worked in silo. Mr Leveson set out that delays to the application process had a significant effect on his family, especially in the context of needing to attend regular hospital appointments. Mr Leveson was registered for Council Tax and with the SEND transport service, whilst his son was enrolled in a local school. Despite the authority holding all of the relevant information, Mr Leveson was still required to provide the information again when renewing the Blue Badge.
- 4.11 The Panel feels that the Council should be doing everything it can to remove obstacles for Blue Badge users but it was concerned that sometimes it seemed as though the Council was actually putting additional obstacles in the way. One example relayed to the Panel was of a resident having to attend the Customer Service Centre to deal with the a Blue Badge application in person only to be sent away as they did not have the full DLA letter from the DWP, despite the fact that it was only the first page that contained the relevant information.
- 4.12 The Panel heard evidence from Mr Leveson that in comparison to applying for other services, applying for a Blue Badge could be frustrating but that this was partly due to only having to do it every three years, so exposure to the process was limited. It also meant that the process could have changed since the last application. The Panel was advised that one of the main sources of frustration was not being able to speak to the concessionary travel team directly and having to go through Customer Services instead, as this caused delays and generated multiple contacts with the Council unnecessarily. The Panel feels that there should be some provision to speak to the Concessionary Travel team directly, given the vulnerable nature of some of the applicants for Blue Badges and the impact delays can have.

Recommendation:

That provision be put in place for Blue Badge applicants to be able to speak to the Concessionary Travel team directly.

4.13 *Badge Renewal*

The process for renewing a Blue Badge is largely the same as applying for the first time and the Panel notes that it is not necessary to resend the old badge away when applying for a replacement. During evidence gathering, a number of residents raised the issue of a lack of a reminder letter that a Blue Badge was due for renewal. The Panel heard evidence that there had not been a conscious decision to stop sending out reminder letters to residents. However, unlike the previous Bevis system, the system used by the DfT simply did not have the functionality to send out reminder letters automatically at present. The Panel were advised that the DfT system was still in development and had effectively been a beta site for some time. It was anticipated that the facility to generate reminder letters should be forthcoming. The Panel would like to see automatic reminder emails and letters sent out to Blue Badge holders.

Replacement Blue Badges

4.14 The Panel welcomed the fact that there was a specific process in place for reissuing Blue Badges that had been stolen. Badge holders were required to report the theft to the Police and provide a crime reference number. The badge would normally take 7 working days to issue. A number of people who spoke to the Panel as part of this review complained about the length of time that renewals and replacement Blue Badges took. The Panel advocates that the Council should look at ways to speed up the process and explore how lost or stolen Blue Badges could be turned around more quickly. The Panel hopes that the upgrade of the Parking Management IT system may facilitate this.

Recommendation:

That Cabinet explore ways in order to make the process of applying, renewing and being assessed for, a Blue Badge more streamlined and less disjointed. Specifically, the Panel would like Cabinet to consider:

- **Whether updates could be provided to applicants on the status of their application?**
- **Whether this could be automated?**
- **Ensuring that applicants can upload documents online.**
- **That provision of an automatic renewal reminder email/letter to Blue Badge holders at the appropriate point, be explored?**

- 4.15 Throughout the evidence gathering process, it was made clear to the Panel that one of the main concerns from Blue Badge users was around delays and the inherent difficulties involved in having to deal with more than one agency. It was also evident that the Council was the agency that bore the brunt of complaints and was largely held responsible when delays occurred. However, Customer Services process the vast majority of applications on the day they are received. In light of the perception and the fact that the authority has some leverage to try and improve the process, the Panel feel that the Council should take more of a hands-on approach to monitoring the overall journey of applications and ensure that there is a more integrated approach taken by all parties. It is felt that the Council is perhaps best placed to take a leading role on breaking down operational silos.
- 4.16 It is suggested that the Cabinet Member should undertake a piece of work to see what could be done around minimising delays and ensuring that the Council monitors the application process from start to finish. It is felt that bringing responsibility for the whole process under one person will facilitate improvements through a more robust monitoring process. The Panel would like to see the Cabinet Member receive regular performance monitoring updates as part of their portfolio. This will provide relevant data on where delays occur and allow us to better understand where further improvements could be made. Some of the data already exists such as that presented to the Panel by Customer Services. However, there are a number of stages in the process where performance is not collected. As an example, the Panel heard that Stuart Crescent did not collect data on missed appointments for the assessments visits. Missed appointments usually resulted in the application being sent back to the Council and delays occurring as a result.

Recommendation:

That the Cabinet Member should have a greater oversight of the overall process from start to finish. The Cabinet Member should receive regular performance monitoring updates from the different areas and an action plan should be developed to improve monitoring and ensure delays are minimised.

- 4.17 It is felt that there is a gap at the partnership level around monitoring this issue and that it would benefit from the development of a more co-ordinated multi-agency response. As well as the Cabinet Member looking at how they can take a greater role in monitoring the process as a whole, it is evident that the Council can't resolve this issue on its own and needs to work with partners to improve outcomes for service users. To that end, the Panel would like to see the Cabinet Member meet with key stakeholders on a quarterly basis as part of strategic partnership forum to ensure that the overall application process is done in a way that is joined-up and made more accessible. The Council has a number of partnership forums that it uses to develop a multi-agency response and it is felt that this could build on that network. It is suggested that the forum outlined could even be established on a time-limited basis.
- 4.18 The forum would likely be made up of Council representatives, health colleagues, police and the DfT. This would provide an additional level of accountability as well as a dedicated body to ensure that a more integrated and considered approach is

taken. It is suggested that this would also provide an ideal forum for addressing Blue Badge related crime. The Panel feels that this is a major concern and one that requires a partnership level response.

Recommendation:

That the Cabinet Member undertake to arrange a quarterly strategic partnership forum with key stakeholders, including the Council, the Whittington, Police and DfT to ensure that the overall journey is streamlined and made more accessible. This would also provide a partnership forum to address Blue Badge related crime as per recommendation 11.

5 Enforcement and Blue Badge Related Crime

- 5.1 The Panel received a significant amount of evidence around the rise of Blue Badge related crime as well as a rise in the misuse of Blue Badges. A stolen Blue Badge could be worth a reasonable amount of money given that Blue Badge holders can often park free of charge and free from parking restrictions, such as disabled bays or yellow lines. Nationally, Blue Badge theft from vehicles has risen over 600% in the last three years. As the perceived value of a Blue Badge has increased (especially with an ever increasing pressure on London's parking infrastructure), there has been a rise in the number of fraudulent Blue Badges in circulation. The Blue Badge scheme operates across 27 different EU states (plus the UK) and their design can vary from country to country. This provides significant scope for forgery, particularly in the context of the fact that the Badges could be in one of 20 plus languages.

Enforcement

- 5.2 Disabled Motoring UK advised the Panel that the largest amount of complaints they received from Blue Badge holders were around a lack of enforcement of the scheme and the consequent impact on availability of parking spaces and a fear of negative perceptions towards 'genuine' Blue Badge holders. Concerns were also noted that without a proactive enforcement approach, this could lead to members of the public taking it on themselves to police the system and the inherent risks of a rise in vigilantism.
- 5.3 The Panel considered that Blue Badge abuse and misuse is rising due to a number of factors:
- Lack of enforcement
 - Lack of understanding of the rules for the scheme (such as Badge holders allowing family members to use their badge).
 - Failure to return Badges, such as when a family member passes away.
 - A rise in the number of Blue Badges being used from other EU countries fraudulently.
- 5.4 A number of Local Authorities have undertaken various schemes for tackling Blue Badge abuse, ranging from increased enforcement patrols, encouraging the reporting of misuse, communications campaigns and improvements to technology and IT systems. During this Review the Panel visited the London Borough of Bromley to hear from officers from their shared parking service (Bromley and Bexley) about the adoption of a zero tolerance approach to Blue Badge misuse. This came about as a result of concerns from local residents and Blue Badge holders about widespread misuse of Blue Badges in the Borough and it has been up and running for around two and a half years to date.
- 5.5 The scheme involves providing additional training for Civil Enforcement Officers (CEOs) and encouraging them to inspect any Blue Badge they come across during the course of their duties and cross referencing the numerical information on the Badge with information held on the badge holder, such as name and D.O.B. (as

well as the person who was observed using it).The CEO would call up the back office to check with the team for possible misuse and then if anything was considered out of place an investigation would be carried out by the back office. This would usually involve telephoning the registered Blue Badge holder and asking if they were using the badge at the time. Prosecution would depend on whether officers could prove misuse, through the CEO witnessing it or through CCTV footage, for example. We received evidence that the GLC General Powers Act 1972 provides Local Authorities with the ability to request disclosure of the drivers' details and if they failed to provide those, the Local Authority is able to prosecute the registered keeper.

- 5.6 Bromley estimates that around 90% of misuse is carried out by family members. One of the other issues identified was around the fact that it was relatively easy to get a replacement Blue Badge and the original could then often be found again, increasing the number in circulation. A replacement Blue Badge is not marked as a replacement and it is not possible to tell just by looking at the badge. In both instances, it was only when the CEO checked with the back-office that possible misuse could be identified. Bromley also outlined a number of examples of where Blue Badge fraud was symptomatic of wider fraudulent behaviour or criminality; including cases where the investigation also led to instances of housing benefit fraud and illegal sub-letting of a property being identified.
- 5.7 In addition to the enforcement element, a number of communications activities were undertaken as part of the zero-tolerance approach in Bromley, including press releases of successful prosecutions and newsletters to Blue Badge holders to publicise the zero tolerance approach. Bromley also introduced a poster campaign in car parks warning drivers of the risk of prosecution and the likely fines imposed. It was reported to the Panel that, overall the scheme had been overwhelmingly successful and had a positive effect on behaviour change as well as generating the Local Authority significant amount of goodwill and positive press coverage. The scheme was overwhelmingly popular with residents and Blue Badge holders. The naming and shaming of offenders was also well received. Bromley are in the process of expanding the scheme to include an anti-idling campaign, outside local schools.

Recommendation:

That the Council should prioritise tougher enforcement of Blue Badge fraud in order to ensure that those with genuine mobility issues are able to use their vehicles. Training should be provided for Enforcement officers and processes put in place so that any Blue Badge identified by a CEO was inspected and the badge holders' details cross referenced with the back office for possible misuse. The Panel heard evidence that this could take as little as 30 seconds.

Companion Blue Badges

- 5.8 Haringey currently operates a companion Blue Badge scheme which incorporates the vehicle registration number and can be used instead of the Blue Badge. The companion badge has no intrinsic value as it can only be used on the designated vehicle and is aimed at preventing theft of Blue Badges. As part of the application process for this, the resident has to be a Blue Badge holder and provide proof of address in Haringey. The vehicle registration document must be registered to that address and the Companion Badge is only valid for one vehicle. However, unlike the Blue Badge which valid throughout the UK, the Companion Badge was only valid within Haringey. Furthermore, the Panel notes that the Companion Badge is also not valid for TfL managed roads within Haringey.
- 5.9 The Panel is supportive of the Companion Badge scheme and welcomes attempts to tackle Blue Badge related crime. The Panel notes that the Companion Badge costs £30, as opposed to the £10 fee for a Blue Badge. Some of the contributors to the review felt that this was an inconsistency. However, on balance, the Panel is sympathetic to the fact that the Council has to be able to cover the costs of producing and administering the badge. The Council has seen year-on-year budget cuts since 2010 and, the Council has to make difficult choices about which services it is able to subsidise.

Theft of Blue Badges

- 5.10 As outlined, theft of Blue Badges from motor vehicles is a growing concern for Blue Badge users. The Panel heard evidence from some residents that theirs had been stolen on multiple occasions. Aside from the obvious inconvenience of having your vehicle broken in to and the badge stolen, there were also concerns outlined above about length of time it took to get a replacement especially as the process could suffer from delays and there was no facility to track the progress of a Blue Badge application.
- 5.11 The Panel received evidence from Graham Day, secretary of St Ann's and Haringey joint Ward Panel on his experiences as a Blue Badge holder in the borough. Mr Day suggested that theft of Blue Badges was a recurring issue raised at Ward Panel meetings and he had suggested that based on the figures in Harringay ward, there was probably around 700 incidents a year borough wide. Mr Day advised the Panel that he had a device which attached to the steering wheel and locked the Blue Badge in place. The device cost between £30 & £40 and had prevented any further thefts of his Blue Badge taking place. The Panel considered the relative cost of theft prevention devices against the administration costs of renewing stolen badges, sometimes on multiple occasions. The Panel feels that there is a clear case for the Council looking at how it could provide these devices for Blue Badge users, perhaps on an 'invest to save' basis, given the administration costs of providing replacements. It is anticipated that the Council could be able to take advantage of being able to receive a reduced unit cost from buying in bulk. At the very least, the Council should be promoting these devices to its Blue Badge users as part of the application process.

- 5.12 Theft of Blue Badges and Blue Badge-related crime will require working with police colleagues and other key partners to resolve. There is ample evidence of the proliferation of this type of crime and the Panel feels that this needs to be higher up the political agenda. The Council already has a partnership body that looks into crime and community safety and it is suggested that the Community Safety Partnership could provide leadership on this issue and monitor efforts to tackle it going forwards.

Recommendation:

Consideration should be given to how the Council, working with police and partners, could support the rollout of theft prevention devices for Blue Badges. The Panel received evidence that these were particularly effective and cost between £30 & £40. Cabinet should consider whether providing these was cheaper than the administration costs associated with replacing a stolen Blue Badge.

Recommendation:

That the Council works closely with the police to reduce proliferation of Blue Badge related crime. The Panel received evidence that Blue Badge theft from vehicles has risen over 600% in the last three years. It is suggested that the Community Safety Partnership could examine this issue as part of its work programme for 2020/21.

Virtual Permits

- 5.13 The Panel would like to see the Council move to a position of issuing virtual permits instead of a physical Blue Badge and believe that this should be the long term aim of for Haringey. The Panel envisage that this would work in a similar way to car tax, in that all of the information is stored electronically and there is no longer any need to physically display a tax disc on a vehicle's windscreen. All of the necessary documentation is already supplied to the Council as part of the Companion Badge application process. It would simply be a case of the CEO scanning the vehicle registration into a device and an electronic database would hold all of the relevant information, including whether that person held a Blue Badge. The clear advantage of having a system of virtual permits is that there is nothing to steal and there is no risk of forgery. Consequently, it is anticipated that that this would have significant impact on the theft of Blue Badges overnight. It would also negate the need for separate Companion Badges to be issued.
- 5.14 Although a virtual Blue Badge permit would fulfil a similar role to the existing Companion Badge scheme, it is felt that there are a number of distinct advantages. Having a virtual permit system for Blue Badges would minimise any delays associated with processing and delivery and permits could presumably be issued instantly. Having an online database that allowed the CEO instant real-time access to whether or not that person held a valid Blue Badge would also eliminate mistakes and the risk of CEO's incorrectly issuing PCN's for failing to display a Blue Badge or Companion Badge. As has been outlined elsewhere in this report, this is an issue

especially when the holder has had their Blue Badge stolen. Virtual permits would assist with the Council's carbon reduction targets as there would be no need for a paper Companion Badge to be produced, as well as the associated reduction from not having to undertake postage and delivery. It is also expected that there would be savings available from moving to virtual permits through streamlining processes and reducing administration.

- 5.15 The Panel recognise that introducing a system of virtual permits is not something that can be done overnight and that this is a long term aspiration. It would take some time to develop our processes in support of this and there would likely be costs involved in upgrading the functionality of the IT systems and the hand held devices used by CEOs. It is hoped that the decision to upgrade the Parking Management IT System will provide opportunities to explore how this could be done and at what cost. Alongside virtual permits the Panel feel strongly that the Council should also retain some provision of a paper application process as there are significant equalities considerations when moving to an online application system only.

Recommendation:

That the Council explores the feasibility of issuing virtual permits instead of Companion Badges. Cabinet should also ensure that provision of paper applications is retained on some level in order to ensure residents without access to IT are not unduly disadvantaged.

- 5.16 The London Borough of Bromley have moved to a position of virtual permits and advised that they had achieved significant cost savings as a result. There are a number of examples of authorities that have transitioned to a similar system and the Panel would like to see the Cabinet Member engage with other boroughs that have implemented virtual permits to see what lessons could be learnt.

- 5.17 The Panel would also like to see virtual permits encouraged at a pan-London level and believe that the Mayor and London Councils should be engaged to promote this issue. Exploration of the feasibility of adopting a more integrated approach across London is encouraged, albeit it is recognised as a long term outcome. The Panel would like to see a situation where a virtual permit issued to a Haringey resident could be used across London. In order to achieve optimal results in tackling the theft of Blue Badges we need co-ordination at a London-wide level in order to ensure that the IT systems are joined up and that processes are integrated.

Recommendation:

The Cabinet Member should engage with other boroughs that have implemented virtual permits to see what lessons can be learnt. Engagement should also be sought with the Mayor's Office and London Councils to encourage adoption at a Pan-London level and explore the feasibility of having a more integrated system across London.

6 Correspondence and Communication

Correspondence with Residents

- 6.1 The Panel received evidence around a variable quality in the letters and other forms of communication issued by the Council around Blue Badges and associated parking services. Residents were concerned about the tone of some of the communications especially in reference to where that person was required to do something or had failed to provide what was requested. It was felt that the language used could be quite intimidating and a disproportionate emphasis was placed upon the potential sanction or penalty, rather than simply providing the information requested. One example we received was around a straightforward request for information around a Blue Badge renewal, the response to which was unduly focused on highlighting the possible penalties to that person from continuing to use the badge after its expiry. The person was directed to the gov.uk website but no additional information was provided about how long the process could take or what documentation was required.
- 6.2 Other concerns highlighted to the Panel were around a lack of clear advice when it came to communications and concerns that letters and emails were not always set out in a way that made them easy to understand. We also received evidence of instances where the Council treated what was essentially a recurring service request as a complaint. In one instance, a service user wanted to know if and when they would receive a disabled parking bay, but were instead directed through a complaints process. The resident in question also commented that, after receiving approval, they never received any contact from the Council telling them when the bay was going to be installed. Frustrations from residents at automated telephone messages advising people to go online were also relayed to the Panel. It is felt that for those with severe disabilities, it is not always as easy to access online services and that some consideration should be given as to how appropriate this message is in these circumstances.
- 6.3 It is felt that the issues raised in relation to the quality and tone of correspondence are likely to be broader than just Blue Badges and that the issues raised as part of this review will likely have a resonance across the organisation. It is therefore suggested that a review should be undertaken of the correspondence from across the organisation that the Council sends out to its residents.

Recommendation:

That a commitment is given that the Council will carry out a review of the letters and communications that it sends to residents to ensure that they are clear, courteous and without the use of intimidating language.

Reporting a Disabled Bay that is no longer in use.

- 6.4 The Panel heard evidence from local residents and ward councillors that removing a disabled bay that was no longer in use could be quite a long and drawn out process. Many Disabled Bays have been in place for a number of years and in many instances the original applicant may well no longer living there. Given the decision to implement Dedicated Disabled Bays and the anticipated increase in demand for disabled parking spaces, it is felt that there is an imperative to monitor and remove obsolete disabled bays as promptly as possible. The Panel understands that notice has to be given for a removal of a bay and that this can take some time. However, the panel heard anecdotal evidence of the process taking over six months in some cases.
- 6.5 The Panel were keen to see some communications activity undertaken on this issue to engage with residents and encourage them to report bays that were no longer in use. The Panel suggest that there could be a dedicated web page on the Council's home website where residents could 'Report an Unused Disabled Bay.' This could be supported through press releases and other communications activity.

Recommendation:

That the Council implement provision for residents to report disabled bays that were no longer in use and that processes are put in place for adequate monitoring of disabled bays and whether they were being used. Once a bay is identified as being unused there should be a clear timeline for its removal. A campaign should be launched through Haringey People and our website to "report an unused disabled bay".

Communications Activity

- 6.6 In light of concerns from residents that applying for or renewing Blue Badge could be a complicated process and involve liaising with different services and agencies, the Panel would like to see the Council send out a booklet of key information to residents as soon as they are assessed as meeting either the automatic or discretionary criteria. It is anticipated that this booklet will provide a range of information, advice and guidance on the process and the anticipated timescales involved. It would also provide an opportunity for the Council to provide information on other services such as how to apply for a Dedicated Disabled Bay.

Recommendation:

That the Council should send out a booklet of key information to residents as soon as they are assessed as being eligible for a Blue Badge.

- 6.7 The Panel also feel that there is scope for the Council to take a more proactive approach in issuing reminders to cancel a Blue Badge when a death is registered. The Council's Register Office is responsible for the recording of a death. This is usually undertaken by a relative and should be done within 5 days (in England).

As part of this process, a raft of information is given to the next of kin about who to contact and what to do next, including information on pensions, taxes and benefits. The Panel suggests that a reminder around cancelling Blue Badges could be easily incorporated into that process. As has been highlighted elsewhere in this report, a significant amount of misuse of Blue Badges is done by family members including continuing to use the badge after that person is deceased. Cancelling a Blue Badge is unlikely to be at the forefront of a person's mind when registering a death. Providing a gentle reminder at this juncture is felt to be appropriate and in keeping with other forms of information provided.

Recommendation:

That the Council explore ways in which an automatic reminder could be issued to cancel a Blue Badge, along with the existing information given to the next of kin when a death is registered.

- 6.8 Following on from Recommendation 9 in respect of adopting a more proactive enforcement approach to Blue Badges, the Panel feels that a communications campaign should be implemented across the Blue Badge agenda which clearly sets out the Council's enforcement message. This would also provide an ideal opportunity to promote some of the other recommendations from this review such as use of anti-theft devices as well as other pertinent information in relation to parking.
- 6.9 During the course of this review the Panel heard from a representative of the Equalities Steering Group for Haringey staff. The representative advised that she had a non-visible disability and was reluctant to apply for a Blue Badge, due to the fact that she did not 'look' as though she had a disability. It was reported to the Panel that many staff members had encountered hostility from people who perceived that they didn't fit the stereotype of what a disabled person should be. Consequently, a number of staff in Haringey were reluctant to acknowledge their disability and didn't feel entitled to apply for a Blue Badge. The Panel also heard evidence that there were a number of cases disabilities where the symptoms and mobility levels a person has could vary significantly over a short timescale and that basing an assessment on mobility at a fixed point in time was flawed.
- 6.10 The Panel recommends that Cabinet seek to include disability access representatives and the Equalities Steering Group in developing a communications campaign. As part of the campaign, consideration should be given to awareness raising around disability and that staff can access advice and support in applying for a Blue Badge. The Panel suggests that one of the topics of the campaign should focus on raising awareness that not all disabilities are visible.

Recommendation:

A communications campaign should be implemented across the Blue Badge agenda which clearly sets out the Council's enforcement message. It is suggested that disability access representatives and the Council's Equalities Steering Group should be involved in developing this campaign and that consideration should be given highlighting awareness around the fact that not all disabilities are visible.

7 Assessments for Discretionary Blue Badge Applications

Discretionary Application Process

- 7.1 If the applicant does not meet the automatic eligibility criteria for a Blue Badge, Customer Services will refer the applicant for an assessment. In Haringey, Assessment for non-automatic or discretionary entitlement is carried out by a qualified assessor through the Integrated Community Therapy Team (ICTT), at the Whittington Trust, which is located at Stuart Crescent Health Centre. The Panel received evidence from Adeola Akano, Clinical Services Manager for ICTT that the clinic held slots on a Wednesday and Thursday to undertake the assessments, with six members of staff working on them (depending on the number of referrals received). Ultimately, it was the responsibility of the Senior Therapist to make a clinical judgement on whether someone was assessed as qualifying for a Blue Badge and this was done through reviewing the application bundle and consideration of the assessment score. The Panel were advised that the Senior Technician did not undertake the mobility assessment or have direct contact with the applicant (unless it was an appeal). The criteria used in determining eligibility for a discretionary entitlement is set out at Paragraph 2.4 of this report.
- 7.2 Applications for discretionary assessment are taken to Stuart Crescent once a week on a Tuesday by Customer Service staff. When the applications are dropped off, completed assessments are collected at the same time. If the application was approved, payment is requested by Customer Services in order to process the application. The Panel were advised by Customer Service that the application was processed on the day payment was received. Customer Services are not allowed to process Blue Badge applications without receiving payment and could not undertake any part of the process until they knew the applicant had been assessed as meeting the eligibility criteria. Once payment is received, the application is processed and it takes 7 working days for the DfT to issue the badge, as per applications that met the automatic eligibility criteria.
- 7.3 If the application is refused and the person is assessed as not meeting the criteria, Customer Services would then contact that person to advise that their application has been refused and that they have a 30 day window in which to appeal. All of the documents that have been received were retained during the 30 day window in order to support any potential appeal. During an appeal, the applicant could be asked to provide further evidence and could also be asked to repeat the mobility assessment. An appeal is undertaken by the Senior Therapist or the Team Leader at Stuart Crescent. If the appeal is unsuccessful, the application is withdrawn or applicant does not attend the assessment then the case is closed and Customer Services return all of the documents to the applicant.

Electronic Applications and Improving the Process.

- 7.4 The Panel considered the fact that applications were only sent to Stuart Crescent once a week and believes that this is source of delay. Further delays are then caused by the completed assessments also being collected once a week. The Panel were advised that Customer Services did not monitor the time between dropping off and collecting applications but applicants are advised that the process can take up to 6 weeks. The application bundles that are provided to Stuart Crescent are hard copies and the first task that staff at Stuart Crescent have to undertake is to manually key in all of the information from the bundle on to a spreadsheet. The feels like quite an antiquated approach and the Panel are surprised that printed hard copies of the application and documentary evidence are still used. One way to speed up the process and reduce the level of administration is to transfer the information to Stuart Crescent electronically. It is suggested that this would also have the advantage of being able to be undertaken at any time rather than waiting until a Tuesday morning. The Panel heard evidence that the issue revolved around the old IT system used at Stuart Crescent and concerns about information security. The Panel were advised that the Whittington Trust were in discussions to develop a secure system for document transfer.

Missed Appointments

- 7.5 The Panel noted with some concern that the window for late arrival to the assessment appointment was five minutes. If the appointment was missed Stuart Crescent advised that they would usually allow the applicant to reschedule the appointment once, but that after this the application was sent back to the Council. The Panel are clear in their view that an alternative slot has to be provided to applicants if they are unable to attend the appointment and that the Council should ensure that this takes place. The Panel feels that having an inflexible approach will contribute to further delays and that this should be reconsidered. The Panel received evidence from residents that a five minute was a very narrow threshold, particularly for people with limited mobility. Furthermore, this is exacerbated by a lack of parking facilities, including disabled bays, at the site and the fact that it is a walk to the nearest bus stop which involves crossing a very busy road.
- 7.6 The Panel received slightly conflicting evidence from Stuart Crescent as to the flexibility with which staff enforce the five minute window for late appointments. The Panel were initially informed that this was a necessity and that applicants were clearly advised that they could not be late and should arrive early for appointments. After some follow up questions, Ms Akano indicated that there was some degree of flexibility in this. However the experiences of residents that we heard from suggested that this contributed to delays and provided an added level of stress and anxiety for those attending the clinic. The Panel were interested to know what percentage of people had their appointments rescheduled and applications returned due to being late, but were advised that this information was not collected. The Panel feel that this is something that the Cabinet Member for Neighbourhoods may want to follow up on.
- 7.7 The Panel is sympathetic to the pressures that NHS services are under and the fact that delayed appointments have a knock-on effect, but emphasise the need

for common sense to be used. Especially in light the fact that a number of applicants that attend the assessments will have severe disabilities. The Panel would also like to highlight the fact that people attending GP appointments are afforded a 10 minute window. Overall, the Panel believes that there is scope for the Council to work with the ICTT team to improve the service and make it more responsive to residents' needs. It is suggested that the Cabinet Member having greater oversight of this process could be a key driver.

Recommendation:

That consideration should be given on to how to minimise delays within the assessment process, including ensuring that assessment bundles can be transferred to Stuart Crescent electronically.

Recommendation:

It is recommended that, the Council should work with Stuart Crescent Health Centre to ensure that the current 5 minute deadline for late arrivals was extended and a greater degree of flexibility afforded to applicants, given the mobility levels of the people being assessed and the lack of available parking facilities.

The Cabinet should work with the Whittington Trust to ensure that residents were provided with an alternative date when an appointment was missed.

Location of Assessment Site

- 7.8 The Panel raised concerns about the accessibility of the current site at Stuart Crescent given the limited parking available and considered whether alternative sites could be sought. In response, we were advised that there is an alternative site used at Gordon Road and that appointments alternated between Stuart Crescent and the Gordon Road site on a weekly basis. Residents are able to request the Gordon Road site that has more parking available, however this is not advertised and residents would have to call up the clinic to reschedule to then be offered a later appointment at Gordon Road. The Panel notes that the initial letter sent to applicants only refers to the Stuart Crescent site. It is felt that the fact there is a second location to undergo an assessment from could be better communicated to residents and that residents should be given more of a choice between the two.
- 7.9 The Panel would also like to see additional sites sourced across the borough, particularly as both current sites are fairly central and east-west transport links can be slow. It is suggested that commissioning more than one provider to undertake assessments would also provide an additional level of flexibility. Residents should be able to have a choice of location for their assessment. The panel would like to see a site in Tottenham as well as in the west of the borough. The Panel were advised by management at Stuart Crescent that there is not enough capacity at the Hornsey site at present to undertake assessments.

- 7.10 The Panel were advised that Customers Services were commissioned by Parking Services to undertake processing and administration of Blue Badge applications and that Parking also commissioned the Integrated Community Therapy Team to provide discretionary assessments at Stuart Crescent. The current 23 day time scale to undertake assessments was agreed when the contract was last commissioned. This contract was commissioned in 2009/10 and the Panel feel that this should be looked at and consideration be given to recommissioning it given the timescales involved and the fact that increased demand for Blue Badges is anticipated following the recent changes to the eligibility criteria.

Recommendation:

That Cabinet ensures that monitoring of the current 23 day timescale for applications to be processed is undertaken.

That Cabinet also explores recommissioning of the current contract to provide assessments for discretionary Blue Badge applications as it was last done over 10 years ago. The Panel recommends that consideration is given to commissioning additional providers for the assessment process for greater flexibility and distribution across the borough. The Council should explore ways of ensuring that residents have a choice of which centre they attend and that there is some provision in the west of the Borough as well as in Tottenham. The Panel suggests that recommissioning this service could potentially provide an opportunity to speed up the assessment process and minimise delays.

Appendix A

Participants in the Review:

Adeola Akano, Integrated Community Therapy Team Clinical Service Manager from Stuart Crescent Health Centre

Gossica Anichebe, Interim Policy and Programme Manager – LB Hackney

Sofia Bouceddour, Transport Planner – LB Camden

Laura Berryman

Cllr Zena Brabazon

Andy Briggs, AD for Customer Services and Libraries

Cllr Dana Carlin

Cllr Seema Chandwani, Cabinet Member for Neighbourhoods

Cllr Pippa Connor

Ann Cunningham, Head of Operations

Graham Day, Secretary of the St Ann and Haringay joint Ward Panel

Fred Fernandes, Parking Operations Manager

Graham Footer, Chief Executive – Disabled Motoring UK

Cllr Kirsten Hearn, Cabinet Member for Climate Change and Sustainability

Dawn Hunter, Concessionary Travel Manager

Brian Leveson

Carly Norris, Project Manager – LB Hackney

Elaine Prado, Head of Business Change, Customer Services.

Shereen Tennant, Haringey Equalities Steering Group

Chloe Wenbourne, Interim Head of Service - Shared Parking Service (Bromley and Bexley)

David Wray, Blue Badge and Fraud Enforcement Officer - Shared Parking Service (Bromley and Bexley)