

Appendix 2: 13th October 2020 Cabinet response to 22nd June 2020 Overview and Scrutiny Committee 'Blue Badges and Supporting Better Access to Parking for Disabled People' review recommendations

Number	Recommendation	Cabinet Response
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.	Agreed.
2.	<p><u>Disabled Bays and Provision of Dedicated Disabled Bays</u></p> <p>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.</p>	<p>Agreed. The Cabinet agreed a series of recommendations arising from the Operational Review of Disabled Blue Badges and Disabled Parking Bays in September 2019. This included the introduction of dedicated disabled parking bays, an additional eligibility criterion that allows qualification subject to further assessment and an appeals process for applicants who application has been unsuccessful.</p> <p>Demand for dedicated disabled parking bays will be continually monitored to ensure an adequate and proportionate disabled parking provision borough wide.</p> <p>It may also be helpful to note that the disabled Blue Badges offers concessions in Haringey beyond the national scheme and can be used for unlimited time in residential, shared use and paybyphone parking bays, as well as for three hours on single yellow lines.</p>
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.	<p>Agreed. The eligibility criteria for dedicated disabled parking bays has been extended to include an entitlement subject to further assessment. This brings the assessment process for dedicated disabled parking bays more in line with the national disabled Blue Badge scheme. Applicants with severe mobility restrictions may be assessed by Experts</p>

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		Assessors to determine eligibility. Those assessments are undertaken by the Expert Assessors who deal with disabled Blue Badge assessments and are structured in a manner that covers eligibility for both services if required. This reduces bureaucracy and the need to multiple assessments for those services.
4.	<p><u>Applying for and renewing a Blue Badge</u></p> <p>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.</p>	<p>Agreed. It is recognised that the Department for Transport (DfT) disabled Blue Badge system while adequate in handling applications, does not support modern service delivery.</p> <p>As part of the Parking Transformation Programme, a new parking Management IT system has been commissioned and is expected to be implemented by the end of this calendar year. The service has taken the opportunity to include the development of a new Disabled Blue Badge Case Management System (CMS) as part of that procurement. This new system will allow online access as well as online payments.</p>
5.	That provision be put in place for Blue Badge applicants to be able to speak to the Concessionary Travel team directly.	<p>Agreed. This arrangement is now in place and the telephony system allows applicants direct access to the officers dealing with their applications.</p>
6.	That Cabinet explore ways in order to make the process of applying, renewing and being assessed for	<p>Agreed. Currently there are two ways of applying, renewing or replacing a Blue Badge.</p>

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	<p>a Blue Badge more streamlined and less disjointed. Specifically, the Panel would like Cabinet to consider:</p> <ul style="list-style-type: none"> • 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? 	<p>The Blue Badge Application Service is an electronic application service commissioned by the Department for Transport (DfT) and hosted through the gov.uk platform. This service allows applicants to renew or request a replacement badge or submit a new application. This service was implemented in January 2018 and is intended for use by all Local Authority (LA's) in England & Wales. Haringey also retained the paper-based application process.</p> <p>The new Haringey Blue Badge CMS will allow applicants to renew, request replacement badges or submit a new application through the Haringey website.</p> <p>The CMS will allow a status update to be sent to applicants by email. The new CMS will provide an enhanced service, including reminder letters, as well as a link to prompt online payment by credit or debit card once the application is accepted. This will make the process less disjointed and more streamlined.</p> <p>Blue Badge applicants currently have the option of uploading the supporting evidence requested via the DfT Managed Blue Badge Service on the Gov.Uk platform and will also have this option when the Blue Badge CMS is implemented. Work is also under way to provide direct access to Department for Works and Pensions (DWP) data to assist with the administration of the Disabled Blue Badge scheme. This is being led by the Local Government Data Sharing Transformation team.</p>

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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.	<p>It is the intention to share this information through Searchlight which most Local Authorities already use. While due to associated sensitivities, access to this data will not be rolled out to all Customer Service staff. We do have nominated staff within the parking client service can access the data.</p> <p>In practice this will mean that applicants receiving Personal Independence Payment (PIP) and Disability Living Allowance (DLA) who are likely to have an automatic entitlement to either a Disabled Blue Badge, or a dedicated disabled parking bay will not have to supply any documentation.</p> <p>Agreed. The service monitors the overall performance of this service and arrangements will be reviewed to also measures each component part of the process. This will help identify weaknesses or failures at any part of the process. This information can be shared with the Cabinet Member as well as any measures being undertaken to rectify underperformance.</p>
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 level forum to address Blue Badge related crime as per Recommendation 11.	<p>Agreed. The role that this strategic partnership could play is recognised. Discussions are underway with partner organisations to understand the viability of establishing this forum.</p>
9.	<u>Enforcement and Blue Badge related crime</u>	

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	<p>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.</p>	<p>Agreed</p> <p>The service has undertaken enforcement of the fraudulent use of disabled Blue Badges for a number of years. Those operations are led by service experts supported where necessary by Police and Civil Enforcement Officers (CEOs). Those operations involve proactive onsite investigation of Blue Badge usage, as well as the investigation of irregularities reported by CEOs and residents.</p> <p>Further training can be provided to CEOs who already play a role in identifying potential abuse. The functionality of the new IT system will allow validation of Blue Badges using the handheld software, which will link into the national database. We are mindful that all disabilities are not visible, and we therefore seek to adopt an appropriate degree of sensitivity in handling such matters.</p> <p>While identification of the abuse can be done by CEOs, dedicated resources are required in the back office to deal with all follow up actions which can be quite complex. The new operational model being designed and delivered as part of the parking transformation programme will increase capacity across the service and will support increased enforcement in this area.</p>

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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.	<p>Agreed.</p> <p>The service can raise awareness of the availability of theft prevention devices and how they may be purchased, as part of an overall campaign to raise awareness of the scheme, as well as reducing abuse and its associated crime. The new free virtual residential parking permit being issued to Blue Badge Holders will also help reduce theft of badges.</p>
11.	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.	<p>Not agreed.</p> <p>An analysis of costs has been undertaken. The cost to the Council in providing theft reduction devices would exceed current service costs. Current funding limitations need to be considered, as well as the fact the disabled Blue Badge service is not a means tested service. As a consequence, many badge holders will have the resources required to purchase those devices, if required.</p>
12.	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.	<p>Not agreed.</p> <p>The Council already works with the police on misuse of Disabled Blue Badges and this is done in the context of many priorities. Investigating Blue Badge theft does not connect with the terms of reference of the Community Safety Partnership as their role is mainly strategic. However, the establishment of the quarterly strategic partnership forum that will include police representatives would also serve to ensure that the impact of blue badge related of crime is continually raised.</p>

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13.	<p>A) 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.</p> <p>B) 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.</p>	<p>A) Agreed. The decisions arising from the recent review of parking fees and charges included replacing the companion badge with a free virtual residential parking permit for the applicant's home CPZ. Many local authorities who previously offered companion badges have already replaced them with a residential parking permit.</p> <p>The Council will move to virtual parking permits, once the new IT system goes live later this year. Paper-based applications will be retained for this who cannot use online services.</p> <p>B) Agreed. The Council is represented at London Councils Transport Executive Committee (TEC). TEC also provides the opportunity to seek consistency in transport issues. Haringey offers concessions beyond the National Scheme and beyond that offered by many other boroughs and as such those boroughs may also benefit from Haringey's experience.</p> <p>The parking service also collaborates and shares experience with other boroughs and this is reflected in the approach to delivery of the new parking IT system.</p> <p>In particular, the arrangements supporting the new permit offer has been designed taking account of experience of other boroughs who have already gone live with virtual permits.</p>

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	<p data-bbox="374 272 904 304"><u>Correspondence and Communication</u></p>	
14.	<p data-bbox="374 344 1128 528">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.</p>	<p data-bbox="1167 344 2033 456">Agreed. The all communications are being reviewed to ensure that they are clear concise and courteous.</p>
15.	<p data-bbox="374 600 1128 935">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'.</p>	<p data-bbox="1167 600 2033 823">Agreed. This can support efforts in monitoring the wider disabled parking bay provision across the borough. There would not necessarily be a need to remove a disabled parking bay unless there are pressures on kerb space that particular area.</p>
16.	<p data-bbox="374 1007 1128 1118">That the Council should send out a booklet of key information to residents as soon as they are assessed as needing a Blue Badge.</p>	<p data-bbox="1167 1007 2033 1190">Agreed. The national disabled Blue Badge information booklet is provided to each new applicant to ensure a comprehensive understanding of the scheme. Local concessions will also be set out in the letter agreed qualification for the scheme.</p>

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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.	Partly agreed. The Council does not hold next of kin data on Blue Badge holders. The Council does however subscribe to the Government's 'Tell Us Once' service, which allows relatives registering a death to notify several services at that one point of contact. Those notifications are also used to cancel Blue Badges. It may also be helpful to note that the maximum number of years that badges are valid is three years.
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.	Agreed. A publicity campaign has commenced raising awareness of the impact and consequence of parking illegally in Disabled parking bays in Town Centres. This campaign will be extended to cover all elements of the scheme. We will also work with the DfT to promote communications at National Level regarding hidden disabilities.
19.	<u>Health Assessments for Blue Badges</u> 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.	Agreed. Boroughs have their own arrangements in place for mobility assessments by Expert Mobility Assessors. Haringey deliver this service in partnership with the Whittington Health Trust. Discussion on the electronic transfer of applications bundles is underway. It is hoped that a solution will be in place in the near future.

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20.	<p>A) 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.</p> <p>B) Cabinet should work with the Whittington Trust to ensure that residents were provided with an alternative date when an appointment was missed.</p>	<p>Agreed. The appointment letter issued by the Whittington Health Trust is designed in line with their corporate design, we are seeking to bring the letter more in line with the Haringey design. While we are informed that in practice applicants arriving slightly late are not refused an assessment, we are seeking to have this letter revised and a greater degree of flexibility introduced.</p> <p>Agreed. This is being negotiated with the Whittington Health Trust.</p>
21.	<p>A) That Cabinet ensures that monitoring of the current 23-day timescale for applications to be processed is undertaken.</p>	<p>A) Agreed. The monitoring of all component parts of the process will be monitored. The Council measures performance in this area, as well as the timelines for the full end to end application process. We currently aim to process all completed applications within 30 working days. This exceeds the new DfT guidance which allows up to 12 weeks for application handling. We are also working with the Trust to understand the delays in undertaking some assessments. There are varying factors and we are seeking solutions to all. However, we believe that ensuring a better understanding of the process by applicants, allowing them to come well prepared will improve not only improve the customer experience, but will also reduce delays in assessment by reducing the need to rearrange appointments.</p>

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21.	B) 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.	<p>B) Agreed in Part.</p> <p>The Council delivers this service through a partnership arrangement with the Whittington Health Trust. This is not a formal tendered arrangement, but a negotiated arrangement with costs borne by the Trust.</p> <p>Market research has been undertaken to understand the private sector offer. A move to the private sector at present would require significant additional investment in the service. While we understand the limitations of the market research undertaken, it is clear that while there may be some benefits and flexibilities, they would not be extensive.</p> <p>We therefore recommend remaining with the Whittington Health Trust. However, we acknowledge that while the Stuart Crescent and Bound Green Assessment Centres serve the west and central parts of the borough reasonably well, the east of the borough would benefit from a dedicated service. We will work with the Trust to explore opportunities for the future.</p>