

## **REPORT OF THE CHAIRMAN OF OVERVIEW COMMITTEE**

### **OUTCOMES OF SCRUTINY REVIEW: BLUE BADGES**

#### **Purpose of the Report**

1. To share with the Overview Committee the findings from the task and finish review around Blue Badges and to seek the endorsement of the committee for the recommendations of the review to be submitted to Cabinet for consideration.

#### **Information**

##### **Background**

2. As part of their Work Programming process during the summer of 2024, members of Overview Committee expressed concern on how accessible and user-friendly applying for a Blue Badge was for residents since the application process had moved online with paper applications no longer being accepted.
3. After being agreed by Overview Committee for inclusion on its Work Programme, work was carried out to “scope” the review. This work was carried out by the Chairman and Vice-Chairman of the Overview Committee, in consultation with Marie Rowney - Group Manager Customers, Complaints and Information. This work identified the key objectives for review as well as setting out the strategic context in which the issues involved would be considered.
4. As a result of the scoping work that was carried out, the key objectives that would guide the review were identified as being:
  - To examine the application and issuing processes for Blue Badges in Nottinghamshire.
  - To consider any improvements that could be made to the Blue Badge application and issuing processes for Nottinghamshire residents.

##### **Link to Council Priorities**

5. The work of the Council’s scrutiny function should always be focussed on supporting delivery of its strategic priorities, which will in turn support the delivery of the best possible services to the residents of Nottinghamshire. The work in scoping the review identified that a review of Blue Badges supported a wide range of strategic priorities, as well as the strategies and policies that underpinned them.

## **The Nottinghamshire Plan 2021 - 2031**

6. The Nottinghamshire Plan 2021 - 2031 is an ambitious plan for the County Council that sets out the Council's strategic vision for the future of Nottinghamshire and the local authority. The activity in the Nottinghamshire Plan is built around achieving a bold 10-year vision for a 'healthy, prosperous and greener future for everyone'. This vision is supported by 10 ambitions which act as a framework for all County Council activity. The scoping activity highlighted how the work of the review would support the delivery of the following ambitions that are set out in the Nottinghamshire Plan:
- Helping our people live healthier and more independent lives.
  - Improving transport and digital connections.
  - A forward looking and resilient Council.

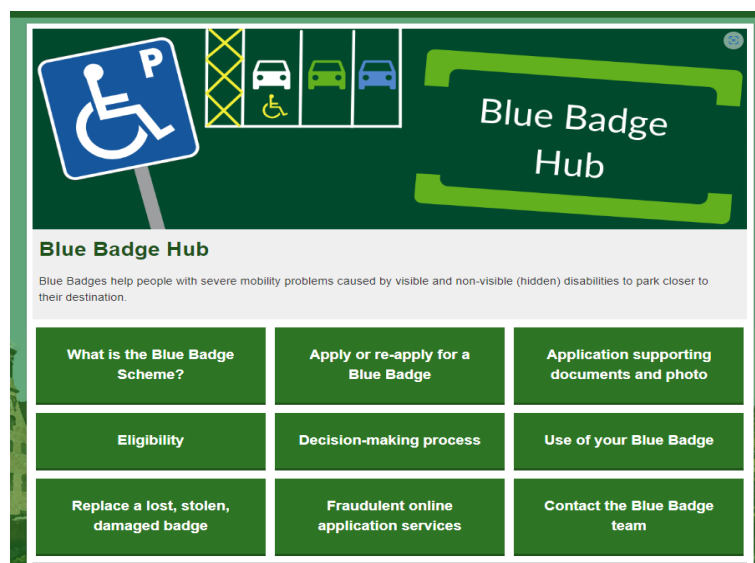
### **The Blue Badge Scheme**

7. The aim of the national Blue Badge Scheme is to help people with severe mobility problems caused by visible and non-visible (hidden) disabilities to park closer to their destination.
8. The Department for Transport is responsible for the legislation that sets out the framework for the Blue Badge scheme, the scheme is then administered by local authorities. The Department for Transport provides guidance for local authorities on eligibility criteria and on how to manage the scheme. The Department for Transport has updated their guidance on a number of occasions, and in August 2019 introduced criteria for assessing and awarding Blue Badges due to not all disabilities being visible, with some being "hidden" and not being immediately obvious.
9. In Nottinghamshire, Blue Badge processing and administration is managed through the Commissioned Services Team at the Council's Customer Service Centre.

### **Blue Badge application process**

10. To apply for a Blue Badge, residents need to complete an online application form on the GOV.UK website. In Nottinghamshire all applications need to be completed online, with paper applications no longer being accepted. If a resident is unable to complete an application online, assistance can be provided to complete an application over the telephone with a trained advisor in the Council's Customer Service Centre. The application process asks a series of questions about a resident's circumstances in order to check their initial eligibility. If, based on the answers provided, a resident is identified as being eligible for a Blue Badge, residents are then required to answer some further questions that will provide the information needed to fully assess their needs and to confirm their eligibility.
11. Blue Badges are issued for a maximum of three years, and when a badge expires each badge holder needs to reapply for a new badge. The scheme regulations, set by the Department of Transport do not include a "renewal" process, and as such all applications for Blue Badges are processed and assessed in the same way. This process ensures that badges are always issued in accordance with the current regulations governing the scheme, with residents having their eligibility assessed on the information supplied in each new application. The Council does not retain historical application data for review, and it is the applicant's responsibility to provide as much detail and evidence as possible every time that they apply for a Blue Badge.
12. The Blue Badge Hub on the Council's website provides a central location for all information on the scheme and the application process. The "big button" format of the Hub has been designed

to make all of the information that a resident needs to support them through the process of applying for a Blue Badge as easy to navigate and as user friendly as possible.



## Blue Badge eligibility

13. There are two types of Blue Badge eligibility, which are:

- Type 1 - "Eligible without further assessment".
- Type 2 - "Eligible subject to further assessment".

Irrespective of whether a resident is eligible under Type 1 or Type 2, everyone seeking a Blue Badge needs to apply using the same application process.

14. **Type 1:** A resident will automatically qualify for a Blue Badge if they:

- receive the Higher Rate of the Mobility Component of Disability Living Allowance
- receive eight points or more under the 'Moving Around' descriptor of the mobility component of the Personal Independence Payment (PIP) or score 10 points under Activity 11, descriptor E in the 'planning and following a journey' part of the mobility component, which states 'you cannot undertake any journeys because it would cause overwhelming psychological distress'.
- are registered blind (severely sight impaired)
- receive a War Pensioner's Mobility Supplement
- have been awarded a lump sum benefit at tariff 1-8 of the Armed 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.

15. **Type 2:** A resident may be eligible for a badge if they:

- have an enduring and substantial disability that causes inability to walk or very considerable difficulty in walking, which may include very considerable psychological distress; in this case they may be asked to have an independent mobility assessment.
- drive a vehicle regularly, have a severe disability in both arms and have considerable difficulty in operating all, or some, types of parking meter.

- are aged under three years and have to be accompanied everywhere by bulky medical equipment.
- are at risk of serious harm, or pose a risk of serious harm to any other person, when walking
- are an organisation caring for disabled people meeting the eligibility criteria. (The application of this criteria is at the Council's discretion).

## **Application and assessment**

16. After applying online, a resident will then need to provide supporting documentation to enable their application to be assessed as well as a photograph for the badge. These documents can be submitted online through the Council's Blue Badge Hub or by post. Whilst the Council aims to process applications as quickly as possible, residents are advised to allow up to six weeks for the processing of their application.

17. Once received, the information submitted both in the application form and in supporting evidence is thoroughly assessed against the Department for Transport's eligibility criteria to judge whether a resident is entitled to receive a Blue Badge. As part of the assessment process, it can be necessary for the Council to speak with a resident about their disability and eligibility for a Blue Badge to gain the fullest understanding of their condition and how it impacts on their mobility. The assessment team carry out hundreds of assessments each day and have undergone significant training to assess each application fairly and consistently against the scheme's eligibility criteria. The team are also supported by healthcare professionals who assist with more challenging or complex applications. If a resident is assessed to be eligible then a Blue Badge will be posted out once all correct documents, a photograph and the £10 badge fee have been received.

18. If after being assessed a resident is found to be not eligible, they will be notified in writing advising how their application did not meet the required criteria for a Blue Badge. Residents are able to ask for this decision to be reviewed if they feel that the decision is wrong. However, unless a resident can provide additional medical evidence in relation to their conditions and how they impact on their mobility that has not been previously provided, or if their condition has significantly deteriorated since they applied, then their request to change a decision is unlikely to be successful.

## **Review activity.**

19. The members of the review group were:

- Councillor Boyd Elliott (Chairman)
- Councillor Glynn Gilfoyle (Vice-Chairman)
- Councillor Sinead Anderson
- Councillor Richard Butler
- Councillor Steve Carr
- Councillor Jim Creamer
- Councillor Mike Introna
- Councillor Mrs Sue Saddington

20. The first meeting of the review group took place on Monday 11 November. In addition to receiving information on the Blue Badge scheme, members received a presentation from Marie Rowney - Group Manager Customers, Complaints and Information, Louise Blant-Harwood - Service

Manager Design Build and Support, and Michelle Thorpe – Commissioned Services Team Leader that provided detailed information on the following issues.

### **The Blue Badge issuing process and administrative arrangements.**

21. The Commissioned Services Team, based within the Council's Customer Service Centre provides end-to-end delivery of the Blue Badge Scheme in line with Department for Transport guidance. In delivering the scheme the key focus is the balancing of the provision of a fair and consistent approach in the processing of applications for Blue Badges whilst also protecting the integrity of the scheme. The Commissioned Service Team are supported in their role by the Customer Services Team who manage enquiries from residents on Blue Badges and support them with the application process. The Customer Service Centre is also running a successful pilot scheme where Customer Service Advisors are making pro-active calls to some categories of badge holders whose badge is about to expire to support them with the reapplication process.
22. The Commissioned Services Team are the authors of the Council's policy on Blue Badges. The team are also responsible for the reviewing and updating the Blue Badge section of the Council's website, managing related complaints, and dealing with appeals when applications have been unsuccessful. The team are also responsible for managing and developing how the Blue Badge assessment process operates in Nottinghamshire and the related IT systems. Staff also attend regular training sessions to learn about updates to the guidance and take part in a range of networking opportunities with other local authorities to share best practice.
23. Over time, the processes for the administration of the scheme have been refined and developed to deliver service improvements, create efficiencies and to ensure that the highest level of customer service is always delivered to Nottinghamshire residents. These changes to processes have enabled the Council to deal with the significant increase in the number of applications for Blue Badges that has been seen in recent years, partly driven by the eligibility changes for Blue Badges that were introduced in 2019.
24. Department for Transport regulations that govern the scheme give local authorities the discretion to charge a fee on the issue of a badge, this fee cannot exceed £10 and has been set at this amount since 1 January 2012. In Nottinghamshire the fee is £10. Despite the increasing numbers of applications, improvements to the procedures around how applications are processed have enabled the average cost of processing each application to be substantially reduced. However, with the fee for issuing a badge having been set at the same amount for over 13 years, it is not possible for the Council to cover all of the costs that are incurred in the delivery of the scheme. As such the Council is always looking at how to deliver further improvements and efficiencies in how the scheme is administered.

### **The Digital First approach**

25. The Council is always looking to make its services more efficient to best meet residents' needs as well as making them sustainable to deliver. To support the delivery of this ambition, the Council's Annual Delivery Plan for 2024/25 states how the Council will "Continuously improve how people are able to access information, advice, guidance, support, and services. This will include improvements to Notts Help Yourself and the Council's website, trialling new technology to improve the customer experience whilst continuing to ensure that people are able to speak to someone over the phone or in person, where this best meets their needs."
26. In December 2023 the Council stopped accepting paper applications for Blue Badges. Documents in support of an application can still be submitted by post if a resident cannot submit

them electronically through the Blue Badge Hub. The change to an online only application process was not sudden and was introduced in phases.

27. In 2022, and with the Council's commitment to a "digital first" approach in mind alongside a significant increase in applications being made for Blue Badges, it became evident that to keep up with service demand and to maintain the best level of customer service, efficiencies in how applications were processed needed to be made. In an endeavour to reduce manual processes and to start the Blue Badge digital journey, applicants who had provided an email address on their paper application form were now managed and communicated with digitally. By the end of 2023/24 digital correspondence use had risen significantly with 96.5% of all communication now being made solely through digital channels.
28. The success seen with the move to a digital by default communication approach initiated consideration of how the entire application process could be made digital and ending the use of paper-based applications. At this time, the continued use of paper applications for Blue Badges, when an online application process was available, had been creating significant challenges for the Commissioned Services Team in their ability to process Blue Badge applications as efficiently as possible. Many paper applications received were using out-of-date forms that had been handed out in locations that were outside of the Council's control. As such, many of these paper applications did not include all the required information to enable them to be processed in a timely way, as changes to the application form and scheme criteria were not reflected in these out-of-date forms. There were also cases of residents submitting photocopies of previous applications, rather than completing a new application form when reapplying for a Blue Badge. This meant that a clear and honest assessment of a resident's current needs, disabilities, and medical conditions was unable to be made against current eligibility criteria. The impact of these issues resulted in increased levels of manual work having to be carried out by the Commissioned Services Team to process applications, resulting in delays for residents in receiving their Blue Badge.
29. As part of the considerations around the introduction of an all-online application process, research and benchmarking activity was carried out to examine the approach being taken by other local authorities. This activity established that a Digital First drive was prevalent at most other local authorities and that, many were at a far more advanced and developed stage than was the case in Nottinghamshire, with many having had paperless processes in place for several years. This benchmarking activity also showed that the ongoing impact of the Covid-19 pandemic, and the budget constraints that were being faced by local authorities were major factors in the move towards a digital approach on how services were delivered and to make them more efficient.
30. The change to communicating digitally with residents who had applied on paper, but who had supplied an email address had shown that for many residents the use of a paper form had been a choice rather than a need. However, there were concerns in advance of the change that moving to an all-online service could make applying for a Blue Badge difficult for some residents. In order to ensure that no resident would be unable to apply for a Blue Badge an external provider was sourced to support residents who could not independently apply online. The provider was ultimately unable to provide the level of service within the required timescales and the arrangement was ended. However, after a successful trial, residents who cannot make an application on-line either independently or with assistance from family or friends will soon be able to complete their application over the phone with a trained Customer Service Centre advisor within five working days of requesting this service. Work has also been completed with community groups across Nottinghamshire to provide guidance and training to enable them to support residents with the online application process if required.

## **Service delivery and continuous improvement.**

31. Department for Transport guidelines state that applications should be processed with 12-weeks of receipt, however in Nottinghamshire the target is to deal with all applications within six-weeks or less. This target is currently being met. The ongoing benchmarking activity and communication that takes place with other local authorities has shown that other local authorities are not working to a similar target of processing applications within 6-weeks but instead aim for the Department for Transport guideline of 12 weeks. Despite the Department for Transport guidance, some local authorities are currently taking up to 24 weeks to process applications.
32. For 2024/25 it is estimated that the Council will process 24,125 Blue Badge applications. In Nottinghamshire, of the applications made:
- 85% are successful and are granted a Blue Badge.
  - 15% are refused as it was not shown on the application how they met the eligibility criteria.
  - 10% of residents that are refused appeal against the decision.
  - 77% of appeals received are successful in being granted a Blue Badge. This is due to additional information being submitted with an appeal.
  - 23% (0.06% of all applications) of residents who appeal are not successful in being granted a Blue Badge.
33. The service is always looking at ways to further improve and develop the Blue Badge application process. Between November 2023 and March 2024, 73% of residents reapplying for a badge had the option to complete their application over the phone. During 2023-24, 70% of new applications were processed as automatically eligible. Currently only residents aged under 75 and who are applying for a first or subsequent Blue Badge under the Type 2 criteria (Eligible subject to further assessment), are unable to apply for a badge over the phone.
34. The service's focus on continuous development and improvement, as well as its focus on providing a high-quality and customer focused experience has resulted in some excellent feedback being received from residents and councillors on the level of service that is provided to residents who are applying for a Blue Badge. There have also been no formal Blue Badge complaints via the Complaints team this year.

## **Appeals**

35. If an application for a Blue Badge is refused, a letter is sent to the resident stating that a Blue Badge cannot be issued based on the information that has been provided. This letter provides information on why badge has not been issued and how the application did not meet the eligibility criteria of the scheme.
36. A resident can appeal the decision by submitting further information and evidence in support of their application by post or through the Blue Badge Hub. Once an appeal request has been received it is assessed by a Specialist Commissioned Services Officer or a Senior Practitioner. This review will take place within 24 hours of an appeal being received. However, in cases where an appeal is complex, these are required to be reviewed by a wider group or by a Team Leader. In these cases, the average processing time for an appeal is currently 7.35 days. Once a decision

has been made, the resident will be informed of the outcome in writing. If an appeal is unsuccessful, a resident must wait for six-months before submitting a new application unless their health or mobility deteriorates significantly during this time.

### **Liaison with the Department for Transport, Benchmarking, Best Practice activity**

37. As part of the Council's commitment to continuous service development, the implementation of best practice and in providing a high-quality and responsive service for Nottinghamshire residents, officers are active members of the Department for Transport's Local Authority Peer Group which is a panel of 19 local authorities who meet regularly to discuss best practice. Officers also participate in the Department for Transport's Local Authority Assessors Group where officers meet to discuss the assessment process in order to ensure consistency in how applications are processed.
38. Officers also actively participate in and use a wide range of information sharing forums including regularly meeting with representatives of nine other Local Authorities. The Council also has a close working relationship with Nottingham City Council around enforcement of the correct use of Blue Badges.

### **Blue Badge fraud, misuse, and enforcement**

39. Whilst there is an amount of Blue Badge fraud nationally, the number of fraudulent applications made in Nottinghamshire is very small with robust processes being in place for these rare occurrences to be managed and dealt with accordingly. However, nationally, instances of fraudulent applications and levels of Blue Badge misuse can be an issue. This can be a particular issue for local authorities that cover large cities where parking is generally more difficult to find and where it can be expensive to pay for.
40. Every successful applicant for a Blue Badge is issued with the Department for Transport's, 'The Blue Badge scheme: rights and responsibilities in England' leaflet with their badge. This leaflet provides the badge holder with the information needed to ensure their badge is used appropriately. As part of the application process the applicant must agree not to allow someone else to use their badge.
41. The vast majority of Blue Badge holders use their badges responsibly, however there are individuals who misuse the scheme. The misuse of the Blue Badge scheme undermines the benefits of the scheme, impacts upon local traffic management, and can create hostility amongst other badge holders who use their badges correctly. Misuse can also result in a genuinely disabled person being unable to access designated parking spaces. In Nottinghamshire, there is no evidence of any significant misuse, with instances of misuse often relating to people in badge holders support networks using a badge when the badge holder is not in the vehicle.
42. Identifying Blue Badge misuse requires local enforcement efforts and community awareness, and the Blue Badge Hub provides an online form for residents to report any concerns about misuse. The enforcement of the Blue Badge Scheme is carried out by the Council's Civil Enforcement Officers, who through their normal patrols identify instances of illegal on-street parking misusing Blue Badges and carry out specific targeted enforcement days and locations throughout the year. During 2022-23, 24 Blue Badges (including expired badges) were seized during Civil Enforcement Officer day-to-day patrols and 11 Penalty Charge Notices were issued for badge misuse.



43. After receiving the information members of the review group took the opportunity to ask questions of officers on the information that had been provided and to discuss the issues that had been raised.

### **Review recommendations.**

44. The Commissioned Services Team continually review how it delivers its services to ensure that they are offering the most cost effective and efficient service for residents and for the Council. As part of the review members learnt about a range of changes to processes for the Blue Badge application service that are currently being trialled and considered to identify the benefits and any drawbacks of these changes. As part of their considerations, members had regard to the impact of the changes on the service received by residents, any costs involved for the Council, and the Council's responsibility to maintain the integrity of the Blue Badge scheme.

45. Members of the review group welcomed that after a successful trial period, residents who cannot independently make an application on-line will be able to complete their application over the phone with a trained Customer Service Centre advisor. This service will be available for any resident that is making a first application (all ages) or a reapplication (under the age of 75) under the further assessment route (not automatically eligible) who does not have online access themselves, are unable to complete the application, do not have any family or friends to help them, or who are unable to access library internet services.

46. Members also noted their support for changes that will enable some types of badge holders, including those in receipt of an automatically qualifying benefit and those who are severely sight impaired, to reapply for their Blue Badge using a short telephone application process. Members agreed that the introduction of this service would make the process of reapplying for a Blue Badge easier and quicker for many residents. Between November 2023 and March 2024 73% of re-applications had the option to complete a phone application.

47. In September 2024, a pilot process was launched to enable applications from residents submitted under Type 2 eligibility criteria (eligible subject to further assessment) who are aged at least 75 and who have had a Blue Badge before, to be processed automatically without going through the full assessment process. Previously, only re-applications from residents submitted under Type 2 eligibility criteria and who were aged at least 80 were processed in this way. This pilot activity has enabled reapplications from this group of residents to be processed more quickly and at a reduced cost to the Council as the full assessment process did not need to be completed for these applications. This change has provided a saving to the Council in officer time and in administration costs. As noted, the Department for Transport regulations give local authorities the discretion to charge a maximum fee of £10 on the issue of a Blue Badge, an amount that has not increased in over 13 years. In this context and alongside increasing demand for Blue Badges, members agreed that this approach to Type 2 reapplications for those aged 75 or over had the potential to enable the costs involved in the administration of the Blue Badge scheme to be reduced and as such was very welcome.

48. Members of the review group noted that whilst there was a risk that adopting this procedure permanently could result in Blue Badges being issued to some residents who did not meet the eligibility criteria, for example if their condition had improved since their previous application, that the risk of this happening was low. Members agreed that for this group of residents, both with mobility difficulties as well as with hidden disabilities, it was unlikely that their entitlement for a Blue Badge under the Type 2 eligibility criteria would have changed since their last application. Members agreed that the benefits that the reduction from age 80 to age 75 for residents reapplying for a Blue Badge under the Type 2 eligibility criteria, reducing the time and cost to the

Council of processing these applications, enabling a simpler application process for residents (also meaning that they could complete their reapplication over the telephone) and the delivery of an even higher level of customer service, outweighed the minute risk of a Blue Badge being issued to a resident who was not entitled to one.

### ***Recommendation One***

***That the pilot activity that has enabled residents who are aged at least 75 years and who already have a Blue Badge to be automatically entitled to a new Blue Badge when they reapply should be maintained.***

49. Another pilot scheme that has been recently introduced has been the proactive calling by Customer Service Advisors to some current Blue Badge holders in vulnerable groups who have a badge that is approaching its expiry date to support them to reapply for a Blue Badge in good time. Feedback from residents who have received one of these calls has been very positive, with residents stating how useful they have found this service with many not being aware that their Blue Badge was about to expire and that they would need to reapply for a new one.
50. Members of the review group agreed that this trial of this proactive calling was an excellent service for these residents and should if resources allow be expanded to include more groups of badge holders. Members welcomed that to give all residents who were being called confidence and assurance that the calls were genuine, calls made from the Customer Service Centre now displayed caller information to show that it was the Council that was calling.

### ***Recommendation Two***

***That the pilot activity of contacting vulnerable Blue Badge holders in advance of their current Blue Badge expiring should be maintained,***

***and,***

***that if current or future resourcing capacity allows, then the benefits of extending this service should be explored.***

51. As part of the review process, members considered the correspondence and forms that are owned and written by Council as part of the application process used to communicate with residents as well as with professionals who are being contacted to request further information as part of an assessment. As noted, the content and wording of the Blue Badge application form is set by the Department for Transport and cannot be amended by the Council.
52. Members welcomed the work that is currently being carried by the Commissioned Services Team to review the content and number of letter templates and forms used in the Blue Badge administration process to further improve their content and accessibility. Members agreed that this work supported the ongoing activity to streamline processes, create efficiencies and to deliver the best level of customer service to Nottinghamshire residents.

### ***Recommendation Three***

***That to make the processes involved in applying for a Blue Badge as clear and accessible as possible, a review of the correspondence and forms used throughout the application process be carried out.***

53. Blue Badges are issued for a maximum of three years, and when a badge expires each badge holder needs to apply for a new Blue Badge. As already detailed, there is now renewal process for Blue Badges with all applications processed and assessed in the same way. The Council does not retain historical application data, and it is the applicant's responsibility to provide as much detail and evidence as possible every time they apply for a Blue Badge.
54. Members agreed that whilst it was important to have a robust application process in place that ensured all relevant information on a resident's health condition or hidden disability was able to be captured, the application form could be time consuming to complete and could also be confusing for some residents. Whilst members agreed that it would be beneficial for many residents if the application questions and process could be simplified, acknowledged that as the application form and questions were set nationally by the Department for Transport, simplifying the online application process, or changing the questions asked was not something that the Council could do independently. Members agreed however that it would be helpful if the Department for Transport introduced a simplified application process that could be used when reapplying for a new Blue Badge.
55. Officers from the Commissioned Services Team are active members of a range of focus groups and forums with the Department for Transport as well as with other local authorities where, as experts in delivering the scheme, they have the opportunity to discuss its delivery and to make suggestions for areas of its operation that can be further improved and developed. Members agreed that whilst the Council's active participation in these groups provided a good opportunity for officers to highlight areas of the scheme where changes or improvements could be made, it would be beneficial if Nottinghamshire MPs could also support this activity by raising the benefits of a simplified online application process for Blue Badge applications directly with the Department for Transport and also with relevant Government ministers.

#### ***Recommendation Four***

***That the Cabinet Member for Finance and Resources and the Chairman of Overview Committee write to all Nottinghamshire MPs to request that they highlight the benefits of a simplified online application process for Blue Badges with the Department for Transport and relevant Government ministers***

***and***

***that through the communication channels available to the Council with the Department for Transport, activity should continue to highlight and support the benefits of further improvements and simplification of the online application process for Blue Badges.***

56. As detailed, there is no "renewal" process for Blue Badges, everyone seeking a Blue Badge needs to apply or reapply using the same application form and process. For those residents reapplying under Type 2 eligibility, all applicants need to detail how their health condition or hidden disability impacts their mobility on their application, as well as providing supporting evidence to enable an assessment to be completed on their entitlement for a Blue Badge.
57. Members of the review group agreed that for residents who were reapplying for a Blue Badge under Type 1 eligibility criteria the process of completing an online application form and providing evidence of their entitlement each time they needed to reapply was a relatively easy and straightforward process to complete. Members agreed however that for residents who were reapplying for a Blue Badge under Type 2 eligibility and who had a condition that was either degenerative or would not improve, having to provide the same information and supporting

documentary evidence (which could be difficult and time consuming to do) each time that they reapplied for a Blue Badge could be a frustrating process when their condition was unchanged or had worsened.

58. For all reapplications under Type 2 submitted by residents aged under 80 (and in the pilot scheme under 75), a full assessment is carried out to assess a resident's eligibility. Members agreed that for reapplications received from residents whose conditions were either degenerative or had stayed the same since their last application, carrying out a full assessment was not the best use of the Commissioned Services Team's resources and also had the potential to lengthen the time taken to process an application.
59. Due to GDPR and other regulations around the retention of data, the Council can only retain the most recent application form received from a resident. This along the lack of a "renewal" function the Council does not currently have a way of recording whether a resident's condition is degenerative or will not improve. Members also noted it was not possible for an additional question to be added to the application form to request evidence of a degenerative or permanent condition. Members however agreed that to make the reapplication process easier for these residents and reduce the number of assessments carried out by the Commissioned Services Team, finding a way of recording whether a condition was degenerative or would not improve to make the reapplication process easier would be a welcome service development.

#### ***Recommendation Five***

***That the possibility of recording information on whether a resident's condition is degenerative or will not improve, in order to enable future applications to be processed more swiftly, be explored.***

60. The Blue Badge Hub on the Council's website provides a central location for all information about the Blue Badge scheme and the application process. Members of the review group agreed that the "big button" format of the Hub, designed to make all of the information that a resident needs to support them through the process of applying for a Blue Badge, was clear and easy to navigate for residents. The format and presentation of the Hub also compares very favourably to the Blue Badge application web pages used by other local authorities. The web pages of other local authorities commonly use a more traditional text based, less visual approach making them more difficult for residents to navigate and to access the information that they are looking for. These sites do not provide the customer focussed approach and ease of access to information that Nottinghamshire residents benefit from when using the Blue Badge Hub.
61. In Nottinghamshire there is a target to deal with all applications for Blue Badges within six-weeks or less. This service delivery target is currently being met and, in many cases, exceeded. Whilst this information on the length of time that the Council takes to process applications is detailed on the Blue Badge Hub, members of the review group agreed that in order to provide the best possible level of service to residents this information should be clearly displayed on the Hub front page (it is currently displayed in the decision making process section accessed from the front page). Members agreed that displaying this information prominently on the Hub's front page could encourage residents to submit reapplications earlier and as such reduce the risk of a resident applying too late in order to receive a new Blue Badge before their old one expires.
62. Members of the review group also agreed that it could be beneficial for residents if the processing time for Blue Badge applications displayed on the Blue Badge Hub was regularly updated to show the current average processing time for applications. Members however agreed that further work would be needed to gain a more detailed understanding of how this could work in practice,

noting that the assessment requirements and processing time for applications submitted under Type 1 and Type 2 eligibility criteria were different.

### ***Recommendation Six***

***That information on the current processing times for Blue Badge applications should be displayed on the front page of the Blue Badge Hub.***

63. Once an application for a Blue Badge has been made by a resident, and where an email address has been provided, all communication to the resident on the application is made through digital channels. If a resident needs to contact the Commissioned Services Team during the application process, the Blue Badge Hub includes a simple web form that they can use to submit their enquiry. If a resident prefers, they can make their enquiry by phone through the Customer Service Centre, however residents are encouraged to use the web form wherever possible as this enables their enquiry to be dealt with in the most timely way.
64. Members of the review group agreed that whilst the communication processes that were in place for the administration of Blue Badges enabled a good level of customer service to be provided to residents, there was the potential in this part of the process to deliver further service enhancements. Members noted that when applying for other types of services such as passports, automated emails and text messages were often sent to applicants at key points of the application process to keep them informed of their application's status. Members agreed that the introduction of this type of service for Blue Badges would have the benefit of enabling residents to be kept up to date with the progress of their application and had the potential to reduce the number of digital and telephone contacts from residents enquiring about the progress of their application. Members agreed that a service of automated emails or texts messages could be particularly useful for residents who were not automatically entitled to a Blue Badge where applications took longer to be processed due to the additional stages of assessment that needed to be completed.
65. The introduction of automated emails and text messages would however result in a cost for the Council in implementation. In advance of any introduction members agreed that a detailed analysis of the costs involved and the potential benefits for residents that this approach could bring to further streamline and improvement the Blue Badge application process would need to be carried out.

### ***Recommendation Seven***

***That a full assessment of the benefits and costs of sending automatic email messages to residents at key points of the application process be carried out.***

66. In delivering services, the Council works to ensure that all of its services are as accessible as possible and are delivered in a way so as not to exclude any group of residents from accessing them because of their individual accessibility needs. To support this ambition, and with the move to a fully online application process, additional services have been put in place to ensure that no resident is unable to apply for a Blue Badge due to them being unable to complete an online application either on their own or with the assistance of family or friends. In order to support equal access to the application process, any resident who cannot independently make an on-line application is now able to complete their application over the telephone with a trained Customer Service Centre advisor.

67. It is recognised however that for some residents completing an application over the telephone may also be difficult due to their particular accessibility needs. To further support these residents work has already been completed with a range of community and voluntary groups across Nottinghamshire to provide them with the guidance and training that will enable them to fully support residents to complete the online application process for a Blue Badge. Members of the review group welcomed the activity that had been carried out so far with the community and voluntary sector. Members agreed that this additional service would be particularly beneficial for residents who did not speak English as a first language or whose disabilities made applying both online, as well by telephone, difficult.

### ***Recommendation Eight***

***That further work and engagement activity should be carried out with community groups across Nottinghamshire to enable them to provide support and guidance to residents who are not able to complete an online or phone application independently.***

68. Members of the review group were in agreement that the Blue Badge scheme in Nottinghamshire is delivered efficiently and effectively, and in a way that provides a responsive, accessible and customer focussed service for Nottinghamshire residents. Members also noted their approval that despite increasing numbers of applications being seen over recent years, improvements to procedures had enabled the average cost and the time taken for the processing of each application to be reduced. Throughout the review process members were impressed by the knowledge and passion shown by the officers who deliver the Blue Badge scheme and their commitment to further develop how the scheme is managed in order to provide the best possible service to Nottinghamshire residents.

69. Whilst there are some specific areas of service delivery where members believe that there are opportunities for procedures to be developed further to deliver enhanced levels of efficiency and customer service, they agreed that the Council's delivery of the Blue Badge scheme should be seen as an example of best practice in local authorities. As such, members agreed that there was potential for the Council to work more closely with other local authorities in the East Midlands Combined County Authority (EMCCA) area to share best practice in the delivery of the Blue Badge scheme and to consider ways of working more together more closely.

70. Working with other local authorities in the EMCCA area could either be in the form of the alignment of procedures to provide consistent application, assessment, and decision-making processes, or could be for Nottinghamshire to fully administer the Blue Badge scheme on behalf of other local authorities which could deliver further efficiencies in service delivery. Members agreed that both approaches had the potential to deliver benefits for the Council and the other EMCCA local authorities, as well as for residents using the service.

### ***Recommendation Nine***

***That the possibilities of Nottinghamshire working with other Councils in the East Midlands Combined County Authority area in the delivery of the Blue Badge scheme be fully explored.***

71. As already detailed, the number of fraudulent applications made for Blue Badges in Nottinghamshire is very low. Members were satisfied that robust processes are in place during the application and assessment processes to enable any fraudulent applications to be identified and dealt with appropriately.

72. In Nottinghamshire the vast majority of Blue Badge holders use their badge responsibly and in accordance with the rules of the scheme which are detailed in the Department for Transport's, 'The Blue Badge scheme: rights and responsibilities in England' leaflet that is issued with each Blue Badge. However, and as already detailed, there is a level of misuse with instances of Blue Badges being used incorrectly.

73. Members agreed that discouraging and identifying Blue Badge misuse required not only Civil Enforcement activity and increased community awareness, but for also for all badge holders to fully understand how to use their badge correctly. As such, any further activity carried out to reduce misuse should be focused on information and education as well as on enforcement. Members agreed however that targeted and focused enforcement activity was an important part of the activity that is carried out to reduce the misuse of Blue Badges. Members noted that whilst the level of Blue Badge misuse in Nottinghamshire appears not to be widespread, any instances of misuse risked undermining the integrity of the scheme, and as such agreed that further activity should be carried out to discourage the incorrect use of Blue Badges.

74. Currently the Council has a programme of Blue Badge enforcement days as well as participating in the national Blue Badge enforcement day coordinated by the London Borough of Lambeth. Members agreed that any further activity carried out to discourage the misuse of Blue Badges should however be proportionate to the problem, as due to the relatively good supply of accessible parking in Nottinghamshire, high levels of focussed and proactive Civil Enforcement activity may not be the most efficient use of resources in tackling the issue. Other local authorities have run campaigns to encourage the correct use of Blue Badges, but which have also reaffirmed that enforcement activity is carried out where appropriate, members agreed that a similar approach to encouraging the correct use of badges could also be used in Nottinghamshire.

**Recommendation Ten**

***That to further support the activities being carried out to ensure the correct use of Blue Badges, that consideration should be given to:***

- a) how further positive communication activity can be delivered to promote the correct use of Blue Badges.***
- b) how a high profile and widely publicised period of enforcement activity could be carried out.***

**75. Summary of recommendations**

	<b>Recommendation</b>
1.	That the pilot activity that has enabled residents who are aged at least 75 years and who already have a Blue Badge to be automatically entitled to a new Blue Badge when they reapply should be maintained.
2.	That the pilot activity of contacting vulnerable Blue Badge holders in advance of their current Blue Badge expiring should be maintained,  and,  that if current or future resourcing capacity allows, then the benefits of extending this service should be explored.

3.	That to make the processes involved in applying for a Blue Badge as clear and accessible as possible, that a review of the correspondence and forms used throughout the application process be carried out.
4.	That the Cabinet Member for Finance and Resources and the Chairman of Overview Committee write to all Nottinghamshire MPs to request that they highlight the benefits of a simplified online application process for Blue Badges with the Department for Transport and relevant Government ministers  and  that through the communication channels available to the Council with the Department for Transport, activity should also continue to highlight and support the benefits of further improvements and simplification of the online application process for Blue Badges.
5.	That the possibility of recording information on whether a resident's condition is degenerative or will not improve in order to enable future applications to be processed more swiftly, be explored.
6.	That information on the current processing times for Blue Badge applications should be displayed on the front page of the Blue Badge Hub.
7.	That a full assessment of the benefits and costs of sending automatic email messages to residents at key points of the application process be carried out.
8.	That further work and engagement activity should be carried out with community groups across Nottinghamshire to enable them to provide support and guidance to residents who are not able to complete an online or phone application independently.
9.	That the possibilities of Nottinghamshire working with other Councils in the East Midlands Combined County Authority area in the delivery of the Blue Badge scheme be fully explored.
10.	That to further support the activities being carried out to ensure the correct use of Blue Badges, that consideration should be given to:  a) how further positive communication activity can be delivered to promote the correct use of Blue Badges.  b) how a high profile and widely publicised period of enforcement activity could be carried out.

## Acknowledgments

76. The Chairman and the members of the review group would like to express their thanks for the invaluable support provided during review process by Marie Rowney - Group Manager Customers, Complaints and Information, Louise Blant-Harwood - Service Manager - Design Build and Support, and Michelle Thorpe – Commissioned Services Team Leader.



## **Other Options Considered**

77. None. The Overview Committee had previously agreed to undertake this review. Therefore, as required by the Constitution, the recommendations of the review, if approved are required to be submitted to Cabinet for their consideration.

## **Reason/s for Recommendation/s**

78. To comply with the requirements of the Constitution that the findings of a scrutiny review are submitted to the Cabinet for their consideration.

## **Statutory and Policy Implications**

79. This report has been compiled after consideration of implications in respect of crime and disorder, data protection and information governance, finance, human resources, human rights, the NHS Constitution (public health services), the public sector equality duty, safeguarding of children and adults at risk, service users, smarter working, sustainability, and the environment and where such implications are material they are described below. Appropriate consultation has been undertaken and advice sought on these issues as required.

## **Financial Implications**

80. There are no direct financial implications relating to the recommendations of this report.

## **RECOMMENDATION/S**

- 1) That the recommendations from the scrutiny review around Blue Badges, as detailed in the report, be endorsed, and referred to Cabinet for consideration.

**Councillor Boyd Elliott**  
**Chairman, Overview Committee**

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## **Constitutional Comments (EKH 14/01/2025)**

81. It is appropriate for this report to be considered by the Overview Committee under its terms of reference.

## **Financial Comments (SES 07/01/2025)**

82. There are no specific financial implications arising directly from this report.

## **Background Papers and Published Documents**

Except for previously published documents, which will be available elsewhere, the documents listed here will be available for inspection in accordance with Section 100D of the Local Government Act 1972.

[Who can get a Blue Badge?](#)

[The Blue Badge scheme: rights and responsibilities in England](#)

[Running a Blue Badge parking scheme](#)

[Blue Badge scheme local authority guidance \(England\)](#)

### **Electoral Division(s) and Member(s) Affected**

- All