OBJECTIVES

Eligibility

- Applications under the discretionary criteria should be assessed by occupational therapists or other appropriately trained clinical staff assessing and not by family doctors.

- The Department for Transport, Scottish Assembly, Welsh Assembly and Department for Regional Development should publish a joint "Good Practice Guide" to create a degree of uniformity in the administration of the scheme.

- All current discretionary badge holders should be reassessed when their badge is due for renewal.

- All issuing authorities should issue reminders for Blue Badge renewals.

Abuse

- All old badges and time clocks should be returned to the licensing department within 7 days after a new badge is issued.

- Badges of persistent offenders should be suspended or revoked.

- Three penalty points should be put on an abusers license and much heavier minimum fines should be imposed.

London Exemptions

- The London boroughs that do not currently recognise the scheme with regard to on-street parking must join the National Scheme.

Blue Badge Responsibility

- Within each local authority in England, Wales and Scotland it should be the department responsible for parking that is responsible for administering the Blue Badge scheme.
1 Background

1.1 Disabled Motoring UK was formed in 2005 from the merger of The Disabled Drivers’ Motor Club (established in 1922) and The Disabled Drivers’ Association (established in 1948). Disabled Motoring UK is the largest UK charity specialising in the mobility needs of disabled people.

1.2 Disabled Motoring UK has approximately 13,000 members across the UK and produces a monthly magazine which is distributed to all members.

1.3 The subject of the Blue Badge scheme for disabled people is a major issue for our membership, resulting in high levels of correspondence.

1.4 It is clear that there are major problems with the existing scheme with regards to misuse, fraud and issuing.

2 Eligibility

2.1 Disabled Motoring UK believes that the “automatic” criteria should continue to include those who receive the Higher Rate Mobility Component of Disability Living Allowance (HRMC/DLA), War Pensioners Mobility Supplement (WPMS) or who are registered blind. We also support the allocation of badges to severely disabled two year olds and we believe that adults with severe double upper limb disabilities should also automatically qualify.

2.2 Disabled Motoring UK is concerned that the varying, and often lax, interpretation of the discretionary criteria has led to perceptions of abuse and lack of clarity about the purpose of the scheme.

2.3 We believe that the discretionary criterion is a severe weakness in the current scheme that jeopardises its viability.

2.4 Disabled Motoring UK believes that the principal criterion for the issue of a Blue Badge should be the virtual inability to walk (i.e. the criterion for the Higher Rate Mobility Component of Disability Living Allowance (HRMC/DLA)). It therefore follows that application of the discretionary criterion should only apply to those aged 65 or over who, but for their age, would have met the criteria for HRMC/DLA or those aged under 65 who have chosen not to apply or are ineligible for HRMC/DLA.

3 Assessing Eligibility

3.1 The patient/G.P. relationship is compromised by the current role of GPs in the assessment of the discretionary criteria.

3.2 Disabled Motoring UK favours the use of a standard questionnaire and interview by trained staff, for example, occupational therapists or other appropriate staff. (Implemented Feb 14th 2011)

4 Administration

4.1 Disabled Motoring UK believes that a “Good Practice Guide” should be drawn up by the Department for Transport (DfT) jointly with the Scottish Assembly, Welsh Assembly and Department for Regional Development in Northern Ireland to create a degree of uniformity in the administration of the scheme.
5 Responsibility within a Local Authority for the Scheme

5.1 At present, responsibility for the scheme rests with different Departments within Local Authorities. Disabled Motoring UK believes that the department responsible for parking should also be responsible for administering the Blue Badge scheme.

5.2 While we commend this approach, we also welcome the approach of local authorities, such as Camden, who have attempted to integrate the administration of the Blue Badge scheme into the wider policy framework of transport and mobility for disabled people.

5.3 Disabled Motoring UK is not satisfied that the responsibility for the Blue Badge scheme should rest solely with Local Authorities since it believes that this leads to different implementations (especially with regard to the discretionary criteria). In Northern Ireland the responsibility for the Blue Badge schemes rests with the Department for Regional Development.

5.4 Disabled Motoring UK therefore believes that a more radical approach is required, namely to administer the scheme nationally. It is realised that this will require a change to primary legislation but we believe that this proposal has considerable merit in ensuring UK wide standards and propose this as a strategic direction.

6 Period and Issue of Badges

6.1 Although we recognise that the issuing of a badge for life may be appropriate in terms of the applicant's disability we believe that the current three year issuing period should be retained to prevent abuse and ensure a properly updated database.

6.2 Some Local Authorities no longer issue reminders and thus disabled people who have accidentally let their Badge lapse might be unfairly penalised. We therefore recommend that all Local Authorities be required to issue reminders for renewal of Badges.

6.3 We believe that there should be links between the DLA Unit and issuing authorities so that, if a person loses eligibility to HRMC/DLA the issuing Authority is notified so that the Blue Badge may be withdrawn.

7 Fees

7.1 We recognise that the Blue Badge is a necessity for people with severe mobility impairments. We therefore propose that there should be no charge for issuing a badge.

7.2 In order to counter abuse we would suggest a charge of £15 where a duplicate badge has to be issued, except where it has been stolen and properly reported to the police, when it should remain free.

8 Appeal System

8.1 We believe that a fair appeal system is necessary, perhaps based on Disability Appeal Tribunals.

9 Renewal Process

9.1 Local Authorities should be required to reassess all applicants as part of the three year renewal cycle and their continuing eligibility for HRMC/DLA (or their continuing eligibility
under the discretionary criteria) be confirmed. This would be greatly simplified by the proposed link with the DLA Unit.

9.2 Although old badges are invalid beyond their expiry date, applicants should be required to return old badges on receipt of their new one. If the old badge is not returned, then the applicant should be advised that no future badges will be issued.

10 **Duplicate Badges**

10.1 We recognise the problems caused by duplicate badges, particularly in terms of potential fraud and abuse.

10.2 We believe that all applicants reporting a stolen badge should be required to inform the police and obtain a crime number.

10.3 Where a badge is lost, a fee should apply (we suggest £15 earlier) and the circumstances should be noted.

10.4 Repeated requests for a duplicate badge should be thoroughly investigated.

10.5 When a badge which has been reported lost is discovered, a detailed investigation should be undertaken.

10.6 When a replacement badge is issued it should have a new serial number on it to aid detection of duplicate badges in circulation.

11 **Temporary Badges**

11.1 We recognise that certain medical conditions may cause temporary, severe, restriction of mobility. However, given the nature of the scheme we would see little merit in a minimum period of less than 12 months.

12 **Organisational Badges**

12.1 We recognise the important role played by specialist organisations in the transport of disabled people.

12.2 We recognise the potential for abuse of organisational badges (although there is no real data to suggest that abuse is more common than elsewhere) but, like other forms of abuse, believe that this is an enforcement issue.

12.3 We note that some transport operations, such as Dial a Ride and Community Transport, are extremely complex in terms of passenger loadings and schedules and that the use of individual passenger badges is not practical.

12.4 We also believe that the potential for theft and abuse is amplified if drivers are dealing with significant numbers of individual badges.

12.5 We note that the majority of organisational badges are issued to charities whose income is directed to the needs of members.

12.6 We therefore support the continuation of the organisational badge and are opposed to any special fee structure.

13 **Concessions**
13.1 We agree that parking concessions are essential to the quality of life and social inclusion of disabled people and recognise, however, that there are a number of areas where the concessions could be strengthened or improved.

14 Exemptions

14.1 Disabled Motoring UK firmly opposes the exemption of the four London Boroughs from the national parking concessions scheme and notes that parking problems in London are no greater than in any other metropolis.

15 Length of Time

15.1 The current time limit in England and Wales is not adequate for many social or business activities and believe it should be increased to at least four hours or, preferably, abolished altogether (as is the position in Scotland).

16 Enforcement

16.1 Disabled Motoring UK believes in firm enforcement of the scheme in order to prevent abuse by disabled and non-disabled people.

16.2 If a badge is suspected of being tampered with or forged, police officers, traffic wardens and Civil Enforcement Officers should have the power to confiscate the badge and seek the name and address of the individual concerned, so that a prosecution can be made. (Implemented Feb 14th 2011)

16.3 Local Authorities should encourage prosecution of those who use badges illegally and publicise all prosecutions.

16.4 The power introduced in 2006 to inspect the details on badges should be used to target abuse.

17 Issuing Penalty Notices

17.1 Where parking enforcement has been decriminalised, local authorities should instruct Civil Enforcement Officers to issue penalty notices to every vehicle not duly displaying a valid badge in a parking space designated for the use of badge holders only.