



Comments from Imtac regarding the consultation on the Blue Badge Scheme in Northern Ireland (Changes to the automatic eligibility criteria, scheme administration, Blue Badge fee and free parking in the Department's car parks)

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About Imtac

Imtac is a committee of disabled people and older people as well as others including key transport professionals. Our role is to advise Government and others in Northern Ireland on issues that affect the mobility of older people and disabled people.

Our aim is to ensure that older people and disabled people have the same opportunities as everyone else to travel when and where they want.

Imtac receives support from the Department for Regional Development.

General comments

Imtac welcomes the opportunity to comment on the current consultation. The Committee commends the Department for undertaking pre-consultation with members of Imtac around the emerging proposals. The members found this meeting positive and constructive and are pleased that a number of issues raised by Imtac at the meeting were incorporated into the final consultation document. The process highlights the wider benefits of early engagement in policy development.

The concessions allowed by the Blue Badge Scheme are essential in enabling many disabled people to undertake day-to-day activities others take for granted. However a number of factors, including misuse and abuse of the Scheme, limit the benefits for Blue Badge holders. These limitations are a source of huge frustration to disabled people and their friends, family and carers and devalue the Scheme in the eyes of the public in general.

A major reform of the Blue Badge Scheme has recently been initiated in Great Britain introducing changes to improve the Scheme. Imtac has been monitoring these changes and we believe that they will ultimately lead to better experiences for Badge Holders in Great Britain. Some of the elements of this current consultation mirror changes made in Great Britain. Imtac welcomes these proposed changes but there are other

areas, such as enforcement of abuse and misuse, where no changes are proposed.

In responding to the consultation Imtac will comment on each proposal. The Committee has also raised a number of other issues which we believe need to be addressed to improve the Scheme here and bring Northern Ireland in line with developments in Great Britain.

Comments on the consultation questions

Options to use PIP awards to determine eligibility for a Blue badge

Imtac welcomes the opportunity to comment on the proposals to change eligibility for a Blue Badge in light of changes to benefits. In terms of the options listed Imtac believes that it is essential that a legislative link is retained between the Blue Badge Scheme and receipt of a PIP award. As applicants for PIP already go through a rigorous assessment process Imtac believes receipt of an appropriate level of PIP award should automatically qualify individuals for a Blue Badge without the requirement for any further assessment. Automatic eligibility should remain for people aged under 16 and over 65 in receipt of Disability Living Allowance.

In relation to level of PIP award determining automatic eligibility Imtac recognises that the Department needs to balance demand for the Badge with the long term viability of Scheme. Traditionally eligibility for the Badge has been linked closely to mobility and in particular limitations on walking distances. However Imtac also recognises that for some disabled people with significant cognitive or learning impairments a Blue Badge would make getting around easier.

Based on the options presented in the consultation Imtac recommends that the legislative link include both those who score 8 points or more within the "Moving Around" activity and those who score the enhanced rate of 12 points or more within the "Planning and Following Journeys" activity. In recommending this option Imtac recognises that the number of people scoring 12 points or more within the "Planning and Following Journeys" activity is likely to be very small and will only involve people with significant impairments. Discussions with the Blue Badge team in

Enniskillen have highlighted that people achieving such a score are likely to receive the Badge under the “further assessment” criteria. The Committee believes in these cases individuals concerned should not be required to undertake further assessment. This will not only benefit the disabled people concerned but will also reduce costs for the Department.

During pre-consultation discussions with the Department Imtac highlighted the importance of maintaining the “with further assessment” criteria as the migration from DLA to PIP is introduced. As the Department for Work & Pensions is predicting a 20% reduction in awards of the new benefit compared with DLA it is likely that many more people of working age will apply for the Blue Badge under this criteria. The Department should also consider measures to ensure that existing Blue Badge Holders of working age maintain access to the Scheme whilst undergoing reassessment for PIP. The Committee has highlighted in another part of this response potential changes that could be made to strengthen the assessment of eligibility under this criteria.

Extending the eligibility criteria for a Blue Badge to include children between the ages of 2-3 with specific medical conditions

Imtac agrees that there is a gap in the current eligibility criteria for children between the ages of 2 and 3. The Committee supports the proposal in the consultation to remove this anomaly.

Changing the application process for obtaining a Blue Badge

Imtac understands the rationale for proposals to remove hard copy applications for the Blue Badge in favour of telephone and online applications. However the Committee does not support this proposal as we do not believe it in the best interests of disabled in that it will make applying for the Badge more difficult for some applicants. Our advice in relation to this matter is based on three factors – (1) evidence that suggests that disabled people are less likely to have access to or to use online facilities, (2) difficulties experienced by some disabled people in relation to telephone based systems including specifically some people with a learning disability and (3) the continued availability of applications for other Government schemes in hard copy.

We believe that it is essential for Department to retain hard copy applications if the process is to remain equitable. However Imtac has no objection to the Department developing both online and telephone applications and encouraging applicants to use these facilities. The Committee would like to work with the Department to ensure that these facilities are developed to be as inclusive as possible and accessible to the broadest range of users.

Moving to the same central database and Blue Badge design and issue as the rest of the UK

Both the central database and the new Blue Badge design are key elements of improvements made to the Scheme in Great Britain. Both help greatly in tackling issues around abuse and misuse of the Scheme. The design of the new Badge also has benefits for users including reducing incidents of Penalty Charge Notices (PCN's) for incorrect display of the Badge. Imtac fully supports the introduction of both proposals as soon as possible.

Increasing the fee (possibly gradually) for a Blue Badge and replacement Badge

Charging for the Badge is the most contentious proposal in the consultation. Like most other organisations Imtac does not wish to see increasing costs placed on disabled people in what are already difficult times. However the Committee does want to see an improved Blue Badge Scheme and recognise that the improvements being sought by Imtac (including some outlined in this consultation) will require additional resource. The Committee recognises that if not funded through increased fees these resources are likely to be funded by savings in other areas which could equally affect older and disabled people. For this reason Imtac supports raising the fee for the Blue Badge and replacement badges. However this support is qualified in that we expect that any increased fee should be linked to investment in improving the Blue Badge Scheme and that the level of the fee should reflect the level of investment. Further consultation would be required with Imtac and others before deciding the level of any future fee.

Imtac does not offer our support for proposals to increase the fees for the Blue Badge lightly. However the Committee believes that investment in improving the Scheme will make it easier for disabled people to use the concessions offered through the Badge. This will deliver significant benefits to disabled people and older people in the longer term. Conversely the Committee is concerned that failure to invest in improving the scheme will diminish benefits of the Blue Badge for disabled people as abuse and misuse will remain unchecked and probably increase. Failure to invest may also lead to questions over the viability and public acceptability of the Blue Badge Scheme in the longer term.

Parking for Blue Badge Holders in DRD car parks

Imtac has for some time advocated the removal of charges for Blue Badge holders in off-street Roads Service car parks. Our rationale for this position is relatively straight-forward in that in many locations, particularly in provincial towns, these car parks are in central locations and offer in some cases the closest parking to facilities such as the Post Office, banks or libraries. Blue Badge Holders have consistently queried why they can park on-street without charge but must pay in these car parks. Many of the same Badge Holders have parked for free in car parks belonging to local authorities in other parts of the United Kingdom.

The Committee acknowledges that some Roads Service car parks are not convenient to town centres and amenities. It would be our contention that these facilities are unlikely to be heavily used by Blue Badge Holders and should therefore not be used as a justification against changing current policy. We recommend that current policy be changed and that charges for Blue Badge holders in Roads Service car parks be scrapped. We believe that such a change would remove the anomalies outlined above and make a significant contribution to making it easier for disabled people to get around.

In relation to the level of concession involved Imtac does not in principle have objections to time limiting concessions. However this should be judged on a site by site basis rather than used as a blanket policy. A further consideration in relation whether or not to time limit the

concession should be the practicality and costs of additional enforcement of the concession.

Other issues

There two main components of improvements to the Blue Badge Scheme in Great Britain which are absent from the current consultation. The first relates to increased enforcement measures relating to misuse and abuse of the Blue Badge. The second relates to the use of Independent Mobility Assessments rather than evidence from GP's to assess eligibility under the "further assessment" criteria.

Tackling fraudulent use of the Blue Badge has been a major priority for reform in Great Britain. Imtac has noted the changes in legislation and the application of increased resources to tackle fraud particularly by local authorities where the Badge has significant value in terms of the savings that can be illegally gained through the misuse of concessions. Imtac has also undertaken a number of parking surveys to assess the level of Blue Badge use in our towns and cities. Surveys indicate that in parts of Belfast City Centre nearly 50% of all on-street parking is by cars displaying Blue Badges¹. Our most recent survey showed that use of the Blue Badge is significantly higher in locations in Northern Ireland where charges are in place for on-street parking².

The high level of Blue Badge use in Belfast and other locations indicates that abuse and misuse of the Blue Badge may be a problem in Northern Ireland. Abuse of the scheme not only deprives Government of parking revenues, it denies parking opportunities to genuine Blue Badge holders and undermines the public perception of the entire Scheme. Imtac is disappointed that the current consultation did not include discussion of the issue and proposals for improving enforcement. The Committee recommends that the Department urgently develop a separate

¹ [Report on surveys of Blue Badge use in Belfast City Centre undertaken in November 2010, Report on surveys of Blue Badge use in Belfast City Centre undertaken in October and November 2011.](#)

² [Report on surveys of the on-street Blue Badge use in Ballymena Bangor, Belfast and Lisburn - February 2013](#)

consultation looking at enforcement highlighting how the scheme is subject to abuse with relevant supporting evidence of the level of misuse, lessons from developments in Great Britain and proposals for increasing enforcement in Northern Ireland. In developing any proposals Imtac recommends the Department take account of recommendations included in Imtac's paper on enforcement of Blue Badge fraud and misuse.³

The use of Independent Mobility Assessments has been adopted by some local authorities in Great Britain as a better means of assessing eligibility under the "further assessment" criteria. As an organisation of disabled people Imtac has some reservations about people having to undergo multiple assessments. However Imtac also has reservations about the role of GP's in the current process. On balance Imtac recommends that the Department should explore whether Independent Mobility Assessments could be a more effective way of identifying Blue Badge eligibility in the future using evidence gained from their use in Great Britain. Further consultation would be required before any changes are made.

Conclusion

Imtac welcomes many of the changes being proposed in the current consultation. The Committee also supports extending concessions to Roads Service off-street car parks. However the consultation falls short of the comprehensive proposals to reform the Blue Badge Scheme currently being undertaken in Great Britain. Imtac believes these changes are essential in ensuring that Badge Holders can benefit from the concessions on offer and ensuring the longer term viability of the Scheme. The absence of concrete proposals to tackle fraud and misuse of the Blue Badge is a significant omission from the consultation. Imtac recommends that the Department bring forward proposals to improve enforcement of the Scheme without delay.

³ [Enforcement of Blue Badge Fraud and Misuse \(May 2011\)](#)