



Department
for Transport

Guidance

Blue Badge scheme local authority guidance (England)

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Introduction

The Blue Badge Scheme

1.1 The Blue Badge (Disabled Persons' Parking) Scheme was introduced in 1971 under Section 21 of the Chronically Sick and Disabled Persons Act 1970 ('the 1970 Act'). [\[footnote 1\]](#)

1.2 The aim of the scheme is to help people with severe mobility problems caused by visible and non-visible ('hidden') disabilities to access goods and services, by allowing them to park close to their destination. The scheme is open to eligible people irrespective of whether they are travelling as a driver or as a passenger.

1.3 The scheme provides a national range of on-street parking concessions to Blue Badge holders. It allows them to park without charge or time limit in otherwise restricted on-street parking environments and allows them to park on yellow lines for up to three hours, unless a loading ban is in place. A list of concessions given to Blue Badge holders in England is summarised at [Appendix A \(https://www.gov.uk/government/publications/the-blue-badge-scheme-local-authority-guidance-england\)](https://www.gov.uk/government/publications/the-blue-badge-scheme-local-authority-guidance-england).

Role of central government

1.4 The Department for Transport (DfT) is responsible for the legislation that sets out the framework for the scheme. This includes:

- the prescribed descriptions of disabled people to whom a badge may be issued - for example, the eligibility criteria
- the maximum fee that can be charged by local authorities for issue of a badge
- the period of issue of a badge
- the grounds for refusal to issue a badge and the grounds to withdraw a badge
- the circumstances in which a badge should be returned to the issuing authority
- the manner in which a badge should be displayed
- the national concessions available to badge holders under the scheme

1.5 A list of relevant legislation is at [Appendix B \(https://www.gov.uk/government/publications/the-blue-badge-scheme-local-authority-guidance-england/blue-badge\)](https://www.gov.uk/government/publications/the-blue-badge-scheme-local-authority-guidance-england/blue-badge)

[guidance-england](#)) and is linked to throughout this document.

1.6 The DfT does not have a statutory duty to provide Blue Badge scheme guidance to local authorities and in line with the government's commitment to localism, there are no plans to introduce statutory guidance. However, the DfT will continue to issue this non-statutory guidance in order to share good practice.

1.7 Local authorities should note that the DfT cannot intervene in the case of individual applications or eligibility decisions.

In addition, the DfT cannot provide local authorities or applicants with individual legal advice on the interpretation of [The Chronically Sick & Disabled Persons Act 1970](#) (<https://www.legislation.gov.uk/ukpga/1970/44/section/21>) legislation that governs the scheme. When such advice is needed local authorities should consult their own legal departments.

Role of local authorities

1.8 Local authorities are responsible for the day-to-day administration and enforcement of the scheme. They are responsible for determining and implementing administrative, assessment and enforcement procedures which they believe are in accordance with the governing legislation. Whatever the local arrangements, it is important that there is effective communication between the teams that issue Blue Badges and those that conduct on-street enforcement.

1.9 It is the responsibility of each local authority to ensure that badges are only issued to residents who satisfy one or more of the eligibility criteria set out in the legislation that governs the scheme. Under no circumstances should anyone who does not satisfy at least one of the criteria receive a badge.

1.10 All members of staff who deal regularly with applicants and badge holders should be included in the local authority's Disability and Equality Awareness training programme. Such training will help staff to understand the importance of the scheme to those who may rely upon it to access goods and services. See Section 8 for further details on the duties placed on local authorities by the Equality Act 2010 [\[footnote 2\]](#).

Scope of guidance

1.11 This guidance applies to local authorities in England. The Scottish Government, Welsh Assembly, and the Northern Ireland Assembly provide separate guidance for their own Blue Badge schemes.

1.12 This guidance is designed to help local authorities put in place administration, assessment and enforcement practices that are:

- fair and consistent in their treatment of Blue Badge applicants
- customer-friendly and clear
- timely and cost-efficient
- resistant to abuse

1.13 This document updates the versions issued in October 2014 and June 2019 to take account of changes to eligibility brought about by introduction of the new eligibility criteria for people with non-visible ('hidden') disabilities (see Section 4). It has been informed by an extensive independent programme of work undertaken on behalf of the DfT by Integrated Transport Planning Ltd (ITP).

This work, referred to in this guidance as the 'independent review', included:

- refining the wording of the scheme's eligibility criteria to clarify that people who experience non-visible ('hidden') disabilities that result in very considerable difficulty whilst walking should be considered eligible to receive a Blue Badge
- updating the non-statutory scheme guidance for local authorities to suggest possible approaches that local authorities may wish to consider using when [The Equality Act 2010](#) (<https://www.legislation.gov.uk/ukpga/2010/15/contents>), considering the eligibility of applicants who experience non-visible ('hidden') disabilities to receive a Blue Badge
- stakeholder workshops with a wide range of local authorities and other organisations, including representatives from disabled people's groups and the Disabled Persons Transport Advisory Committee (DPTAC)
- input from expert medical health professionals
- replacing Independent Mobility Assessors (IMAs) with Expert Assessors (EAs)
- amending the existing model application form in [Appendix D](#) (<https://www.gov.uk/government/publications/the-blue-badge-scheme-local-authority-guidance-england>) and [associated appendices](#) (<https://www.gov.uk/government/publications/the-blue-badge-scheme-local-authority-guidance-england>) to include questions for people with non-visible ('hidden') disabilities

1.14 The guidance also includes case studies from local authorities, evidence from the independent review and information from the Local Government Ombudsman that local authorities may wish to consider.

1.15 Local authorities should ensure that this guidance is brought to the attention of all officers involved in the administration and assessment of applications, issue of badges and parking enforcement.

1.16 Local authorities are also encouraged to join the [Blue Badge Online Community](https://knowledgehub.local.gov.uk/group/bluebadgeonlinecommunity) (<https://knowledgehub.local.gov.uk/group/bluebadgeonlinecommunity>) as well as the [Slack channel introduced by the digital team](https://bbds-uk-%20gov.slack.com/messages/CAHNCBLSE) (<https://bbds-uk-%20gov.slack.com/messages/CAHNCBLSE>), where they will be able to keep up to date with national policy on the Blue Badge scheme and discuss administration, assessment and enforcement issues with other local authorities.

Local publicity and information

Local information

2.1 It is important that people who might be eligible for a Blue Badge are made aware of the scheme and how it can help them to become more mobile and independent. The DfT provides information entitled “[Can I get a Blue Badge](https://www.gov.uk/government/publications/blue-badge-can-i-get-one) (<https://www.gov.uk/government/publications/blue-badge-can-i-get-one>)” and “[The Blue Badge Scheme: rights and responsibilities](https://www.gov.uk/government/publications/the-blue-badge-scheme-rights-and-responsibilities) (<https://www.gov.uk/government/publications/the-blue-badge-scheme-rights-and-responsibilities-in-england>)”. A printed copy of the rights and responsibilities information is sent out via the Blue Badge Digital Service with each badge issued.

Members of the public are also able to check whether they or someone they know might be [eligible for a badge](https://www.gov.uk/apply-blue-badge) (<https://www.gov.uk/apply-blue-badge>).

2.2 Local authorities should aim to provide information about the scheme in simple language and in accessible formats on their websites and at locations that are likely to be accessible to disabled people. This information can typically cover:

- who is eligible for a badge
- how to apply for a badge
- the parking concessions available to badge holders
- the rules of the scheme and how badge holders should use a badge
- how the scheme is enforced
- when, and how, to reapply for a badge

- who to contact at the local authority for further information about the scheme

Case Study - Information

Wandsworth Borough Council has developed a series of pages on its website that are structured around bite-size topics that has made it easier to present information on the scheme in a clear and easy to understand way.

On its website, Southampton City Council provides information about the Blue Badge scheme through a series of Frequently Asked Questions. These are designed to enable potential applicants to obtain answers to basic questions they may have about the scheme and the council believes this will reduce the number of telephone enquiries received from members of the public.

Publicity on Blue Badge misuse

2.3 Publicity campaigns on Blue Badge misuse and enforcement initiatives can be effective in reducing misuse of badges. These may include the use of posters, leaflets and media campaigns and can be undertaken to a scale and cost that is appropriate to the local circumstances.

The application process

Handling initial enquiries

3.1 It is important that potential applicants are provided with sufficient information and support at the initial enquiry stage. This should cover both their likely eligibility and the application process itself – particularly regarding any supporting evidence that the applicant will need to provide. This approach enables better screening of potential applicants and greater assurance that applications are properly completed at the first attempt.

3.2 Initial enquiries about Blue Badge applications can be handled directly by Blue Badge administration teams or by local authority contact centres.

With sufficient advice and training, officers or customer service advisors can often establish over the telephone whether an individual is likely to be eligible or not. This can help to reduce the number of clearly ineligible applications and ensure that applicants who may be eligible receive the appropriate forms and information for their circumstances.

3.3 The Blue Badge Digital Service includes an online [eligibility checker \(https://www.gov.uk/apply-blue-badge\)](https://www.gov.uk/apply-blue-badge) so that members of the general public can check quickly and easily whether they may be eligible for a badge. Further information on the Blue Badge Digital Service is given in Section 8. Local authorities may wish to use similar eligibility checkers in their interactions with potential applicants at [Appendix H \(https://www.gov.uk/government/publications/the-blue-badge-scheme-local-authority-guidance-england\)](https://www.gov.uk/government/publications/the-blue-badge-scheme-local-authority-guidance-england).

Applications by individuals

3.4 It remains a matter for each individual local authority to decide on and to produce application form(s) for their area. Some local authorities have one form for all Blue Badge applications, while others have several forms, each catering for applications made under different eligibility criteria.

3.5 To assist local authorities in deciding whether or not an applicant meets the eligibility criteria, the DfT has produced a model application form with accompanying guidance notes for applicants on how to complete the form. The DfT recommends that authorities provide the guidance notes as a separate document to the application form so that they can be retained by the applicant for future reference after their application has been submitted.

3.6 The model form has been informed by work done with local authorities, mobility experts and disabled people as part of the 2011 independent review, as well as follow-up work in 2018/19 focused on people who experience non-visible ('hidden') disabilities. The form has been used as the basis for the national online application facility that is available to members of the public via Gov.UK as part of the Blue Badge Digital Service. People can [apply online](#).

Medical information

3.7 It is important that applicants, at the initial application stage are asked to provide detailed information about their condition and how it causes them to:

- be unable to walk
- experience very considerable difficulty whilst walking, which may include very considerable psychological distress
- be at risk of serious harm when walking; or pose, when walking, a risk of serious harm to any other person

3.8 Providing this information enables local authorities to make more informed and quicker decisions, especially in circumstances where an applicant is clearly eligible under the automatic criteria, or clearly ineligible for a Blue Badge. Detailed information provided at the point of application can also avoid the need for the applicant to undergo an impartial mobility assessment, or for the local authority team to seek additional expert insight into how the applicant's condition affects their mobility.

3.9 When designing the application form, the questions used will depend on the assessment approach adopted by the local authority. For example, information gathered about an applicant through the application form can be used:

- to enable the cross-checking of relevant personal information held by the local authority in relation to the applicant's condition and care (for example, social care records)
- as the basis for a desk-based assessment of an applicant's likely eligibility under the 'subject to further assessment' criteria
- as a means of verifying information the applicant provides, cross-referencing observations made by a healthcare professional during an in-person assessment, and/or in response to questions they have been asked through correspondence with the local authority.

Core personal data

3.10 The model application form includes the core personal data that DfT recommends is requested from the applicant as a minimum:

- full name (m)
- gender (see para 3.26 - 3.28) (m)
- date of birth (m)
- name at birth if this has changed, for example following marriage (m)
- national Insurance number
- current address and postcode (m)
- main phone number
- badge number of current Blue Badge (if reapplying for a badge)

3.11 When local authorities request badges to be printed through the Blue Badge Digital Service, they will be asked to complete some mandatory fields. It is therefore essential that the information marked above with an (m) is provided at application stage. The information is needed to personalise the badge or to enable data- matching for fraud prevention purposes.

Checks at application

3.12 Through consultations with local authorities, the DfT is aware of many cases where people have been able to obtain badges fraudulently. Examples include people using fake identities, fake addresses or even applying in the name of people who have died. It is vitally important that the issuing local authority carries out checks at the application stage to ensure, as far as possible, that people are who they claim to be and that they are resident in that authority's area.

3.13 Research undertaken on behalf of DfT has previously shown that less than half of all local authorities check a person's identity on application. Also, some do not check whether an individual is who they claim to be at the time of an in-person mobility assessment. Local authorities are strongly encouraged to implement a robust identity management system to help reduce fraud and abuse of the scheme.

3.14 The Blue Badge Digital Service includes ways of checking key information automatically to help prevent abuse of the scheme and to help ensure that those automatically eligible receive a badge more easily. For example, automatic checks can be made on whether or not an applicant has already been issued with a badge by a different local authority

3.15 The model and GOV.UK on-line application forms aim to ensure that key information is captured to establish a person's identity. For example, information in relation to a person's birth does not change during their lifetime and can be compared with information held in other records, such as social security records. A person's National Insurance number will also enable cross-checks to be made. The DfT recommends that local authorities request information and/or documents that are harder to fake and forge. So, for example, local authorities are asked to check for residency against Council Tax records or the electoral roll. The DfT recommends that local authorities no longer request documents such as rent books or utility bills as proof of identity or residency as these are easy to fake and forge.

3.16 Local authorities will also want to establish whether the applicant has previously held a badge (a "re-application") or whether it is a new application. For re-applications, the DfT recommends that the previous badge number (first six digits) is included on the application form in order to

aid a local authority to locate previous records. A common badge numbering system has been introduced as part of the Blue Badge Digital Service. The number displayed on each badge is unique and should include references to the gender and date of birth of the badge holder, and the date of expiry of the badge.

3.17 Changes to the badge design mean that a person's signature is no longer needed for the badge. This badge design that was introduced on 1 January 2012 includes a digitally-scanned, passport-style photograph of the badge holder on the rear of the badge.

Declarations

3.18 The DfT strongly recommends that local authorities include declarations at the end of the application form for the applicant to review and sign. These can help to combat fraud and to allow the local authority to cross-check relevant information with other council departments. Suggested statements that could be included are shown in section 7 of the model application form. These declarations appear at the end of the national on-line application form that is available via GOV.UK.

3.19 Declarations can be used to confirm that the applicant:

- understands the application process and has answered the questions honestly
- understands that they will need to abide by the rules of the scheme
- understands how the data provided will be used by the council and where necessary, has given permission for data sharing in accordance with the Data Protection Act
- gives their consent for the release of medical information required for assessing eligibility

3.20 Local authorities may wish to refer to guidance issued by the Information Commissioner's Office, including their Code of Practice on privacy notices.

Completion and submission of applications

3.21 There are several ways that applications for a Blue Badge can be submitted to the local authority. Many local authorities have a printed application form that can be completed, signed, and submitted with the required photograph, fee (where levied) and supporting evidence. Local

authorities may achieve efficiency and/or customer service benefits by also providing alternative ways of completing and submitting applications, as outlined below.

Assisted completion

3.22 With sufficient training, Blue Badge advisors can assess over the telephone whether an individual is likely to be eligible. They can also partially complete an application form, which can then be sent to the applicant for signature, photograph and supporting evidence. Where a contact centre is available, the role of handling and processing initial applications can be absorbed by customer service advisors to streamline the administration process.

Case Study -assisted completion

Civica have an administration team and on behalf of Worcestershire County Council assess all Blue Badge Applications and issue the Blue Badges. Telephony customer service advisers also provide guidance to customers in how to apply for a Blue Badge, what evidence required, and so on.

There are no independent mobility assessments, the assessment for a Blue Badge is purely based on what evidence the applicant provides and whether it meets DFT requirements or not.

Customer service centres no longer assist with Blue Badge Applications or help with supporting evidence etc. This is all done by front-line library staff at all the local libraries in Worcestershire. The only exception to this is at The Hive (Worcester City Council) where they offer an appointment/reception service to handle Blue Badge enquiries, help fill the form in, and so on.

Shropshire Council use telephone or online application services that minimise the need for Blue Badge applicants to physically visit their local authority offices in order to collect and submit application forms.

Online applications

3.23 The Blue Badge Digital Service offers a national online application facility through GOV.UK. Applicants will still need to provide the appropriate,

passport-style photograph, any supporting documents required (i.e. proof of identity, residency, and eligibility) and the appropriate badge issue fee (where levied). In some cases, an applicant will upload a photograph as part of the online application and some local authorities now accept on-line payments via GOV.UK Pay.

3.24 One of the major advantages of an online application is that the information entered by the applicant (or by the local authority in the case of assisted completion) automatically populates their record on the Blue Badge Digital Service. This has the potential to improve efficiency by eliminating local authority staff time spent scanning or transcribing written application forms and avoids errors that may arise from this process.

3.25 Feedback from badge holders suggests that those with internet access are keen to be able to submit completed application forms online in the future. Demand for online applications is increasing. Since February 2019, there has been an increase of approximately 13% in online applications.

Transsexual and transgender applicants

3.26 Non-binary, transsexual and many transgender people live permanently in a gender other than that assigned at birth. Accordingly, their name and personal details will have changed. Discrimination against such people in many circumstances will be unlawful and best practice will always be to regard the individual in the gender with which they identify. In addition, the Gender Recognition Act 2004 [\[footnote 3\]](#) affords privacy of gender history to transsexual people who have obtained a Gender Recognition Certificate. Disclosure of that gender history, except in certain limited circumstances (see section 22 of the Act [\[footnote 4\]](#)), is a criminal offence. A Gender Recognition Certificate should never be requested as proof of identity.

3.27 Some applicants, particularly those who have recently commenced living in a different gender, may, for a number of reasons, find it difficult to provide the appropriate documentation, so local authorities will need to be more flexible in assessing the proof of identity of transgender people. Respect for the individual and privacy of gender history are of paramount importance. For more advice and information on transsexual and transgender issues please contact: agender@homeoffice.gov.uk.

3.28 Since 15 October 2007, the Blue Badge has included a non-binary gender marker (not exclusively Male/Female). Since February 2019, the gender marker now includes those who may identify in a different way. It is important that local authorities deal with applications made by non-binary, transsexual and transgender people sensitively, and issue badges under the requested gender.

Life limiting illness

3.29 Local authorities may wish to consider having a fast-track application process for people who have a terminal illness that seriously limits their mobility, in order to make the final weeks of their life easier. These applicants are sometimes in receipt of a SR1 medical report.

Badge issue fee

3.30 The regulations governing the Blue Badge scheme give local authorities the discretion to charge a fee on the issue of a badge. This fee cannot exceed £10.

3.31 Local authorities should note that only successful applicants should be asked to pay the badge issue fee. The fee may also be charged if badge holders request replacements for badges that have been reported as lost or stolen, or because they are not clearly legible or have been damaged.

Photographs

3.32 The photograph is a key feature in reducing abuse of the scheme and enabling effective enforcement. Local authorities can refuse to issue a badge if they have reason to believe that the applicant is not who they claim to be or that the applicant would permit another person to display the badge on a motor vehicle.

3.33 Each applicant should be asked to supply one passport-sized and passport standard photograph clearly showing their full face so that they can be easily identified.

3.34 Since 1 January 2012 badges include a digitally scanned, passport-style photograph. For more information, please see the Local Authority Circular.

3.35 The requirements for a photograph on the badge are set out in The Disabled Persons (Badges for Motor Vehicles) (England) (Amendment) No.2 Regulations 2011 [\[footnote 5\]](#) and follow closely the recommendations for passport photographs:

3.36 The photograph must be a close-up, digital photograph of the head and shoulders of the badge holder. The photograph shall have a strong definition between face and background and shall be:

- in colour
- 45 millimetres in height and 35 millimetres in width (passport size)
- taken within the month prior to the date of the application, against a light grey or cream background
- undamaged, free from 'redeye', shadows, reflection, or glare from spectacles
- of the full head of the holder (without any other person visible or any covering, unless it is worn for religious beliefs or medical reasons)
- facing forward
- with nothing covering the face
- looking straight at the camera
- with a neutral expression and mouth closed
- with eyes open and clearly visible (without sunglasses or tinted spectacles and without hair or spectacle frames obscuring the eyes)
- in sharp focus and clear
- printed professionally or in digital format
- a true likeness, without amendment

3.37 The DfT recommends that, for hard copy photographs, local authorities ask that the applicant's name be written clearly on the back of a photograph and that the applicant, or the person applying on their behalf, confirms in the declaration section of the application form that the photograph is a true likeness.

3.38 A close-up digital photograph of the head and shoulders of the badge holder must be displayed on the badge and a photograph should also be kept on the individual's file. The only circumstance in which a photograph of the holder does not have to be displayed on a badge issued to an individual, is in the case of an eligible disabled person with a terminal illness if the issuing local authority is satisfied that the estimated life expectancy of that person is less than 6 months.

3.39 People who are unable to access photobooths (for example, wheelchair users) should be asked to provide a suitable photograph taken by other means which meets the passport-style standards outlined above. No other person should be visible in the photograph. Some local authorities now have webcam facilities for taking photographs for applications for a range of services and may wish to offer this as a convenient way for Blue Badge applicants to obtain a photograph.

3.40 The DfT recommends that the photograph be returned to the applicant if their application is unsuccessful.

3.41 Photographs do not need to be provided for organisational badges.

Determining the eligibility of individual applicants

The two types of eligibility criteria

4.1 An individual's eligibility for a Blue Badge is considered in terms of being 'eligible without further assessment' (previously known as 'automatic') or 'eligible subject to further assessment' (previously known as 'discretionary').

4.2 [Appendix K: Flowchart - Subject to further assessment criteria](https://www.gov.uk/government/publications/the-blue-badge-scheme-local-authority-guidance-england) (<https://www.gov.uk/government/publications/the-blue-badge-scheme-local-authority-guidance-england>) summarises the application process steps for assessing applicants under the 'eligible subject to further assessment' category.

4.3 In no circumstances should a badge be issued to an applicant who does not meet one of the eligibility criteria set out in the legislation which governs the scheme. Badges should never be issued to people solely on the basis of their age and should not be issued for any purpose other than to assist the recipient when undertaking journeys.

Type 1: 'Eligible without further assessment'

The 'eligible without further assessment' criteria

4.4 People who may be issued with a badge without further assessment are those who are more than three years old and fall within one or more of the following descriptions:

- receives the higher rate of the mobility component of the Disability Living Allowance (HRMCDLA)
- receives the mobility component of Personal Independence Payment (PIP) and has obtained 8 points or more under the "moving around" activity
- receives the mobility component of PIP and has obtained 10 points specifically for descriptor E under the "planning and following journeys" activity, on the grounds that they are unable to undertake any journey because it would cause them overwhelming psychological distress
- is registered blind (severely sight impaired)
- receives a War Pensioner's Mobility Supplement (WPMS)

- has been both awarded a lump sum benefit at tariffs 1-8 of the Armed Forces Compensation Scheme and certified as having a permanent and substantial disability which causes inability to walk or very considerable difficulty in walking

Notes:

- Armed Forces Independence Payment (AFIP) [\[footnote 6\]](#) awards are not included in the type 1 eligibility criteria
- for applicants in receipt of PIP, a local authority should not base a decision to award a Blue Badge on a combined score from both the 'planning and following journeys' and 'moving around' mobility activity

If an applicant does not meet the required score for either mobility activity, then they fail to meet either of the above 'eligible without further assessment' PIP criteria and may be considered instead under the 'subject to further assessment' criteria (see below).

While cumulative points under the "moving around" mobility activity can count towards qualification under this criterion, this does not apply to the 'planning and following journeys' mobility activity.

Under the 'planning and following journeys' mobility activity only a score of 10 points for descriptor E ("cannot undertake any journey because it would cause overwhelming psychological distress to the claimant") counts as meeting eligibility.

Applicants in receipt of 10 points for descriptor D, or 12 points for descriptor F under the 'planning and following journeys' mobility activity do not qualify under this criterion. Such applicants should be considered under the 'subject to further assessment' criteria.

Applicants in receipt of a grant pursuant to paragraph 10(3) of Schedule 1 to the National Health Service Act 2006 [\[footnote 7\]](#) or section 46 of the National Health Service (Scotland) Act 1978 [\[footnote 8\]](#) - also qualify for a Badge without further assessment. However, we believe that the number of people this will apply to is very small. Applicants in this position, and who are not able to demonstrate their eligibility under one of the other '...without further assessment criteria' should contact their local authority with recent evidence of this grant being awarded.

Detailed guidance on proof of entitlement

4.5 Provided that the applicant can demonstrate that they satisfy one of the criteria listed above, and can satisfy identity and residency checks, the DfT expects badges to be issued with the minimum of formality in these cases.

Proof of entitlement should be provided, in the form of Proof of receipt of the higher rate mobility component of Disability Living Allowance (HRMCDLA).

4.6 An applicant in receipt of HRMCDLA will have an award notice letter from the Department of Work and Pensions [\[footnote 9\]](#) which also issued applicants with an annual uprating letter, stating their entitlement. Local authorities can ask applicants for a copy of this annual uprating letter as proof of their receipt of HRMCDLA if their award letter is more than 12 months old.

“Indefinite or “life” awards are still subject to review, and therefore older award letters may not be reliable indicators of whether a person currently has an award of HRMCDLA. If the applicant has lost their HRMCDLA award or uprating letter, then they can be advised to contact DWP for a current award letter by:

- telephone: 0800121 4600
- textphone: 0800 121 4523
- email at DCPU.Customer-Services@dwp.gov.uk

4.7 This helpline is open from 7.30am to 6.30pm Monday to Friday, and further details can be found on the relevant [GOV.UK pages](#) (<https://www.gov.uk/dla-disability-living-allowance-benefit>)

4.8 The DfT is aware that some local authorities have been accepting vehicle tax disc exemption certificates (DLA 404 or WPA0442) as proof of eligibility for HRMCDLA or WPMS and are awarding a Blue Badge when these certificates are submitted in support of a badge application. Because these exemption certificates are issued each year for a 12-month period, the DfT strongly discourages the practice of accepting these vehicle tax exemption certificates as the basis for awarding badges under the ‘without further assessment’ criterion.

The local authority may, however, wish to inform applicants in receipt of HRMCDLA, qualifying categories of PIP or WPMS that they are eligible to receive the vehicle tax exemption if the vehicle is registered in the name of the disabled person or in the name of a nominated person when the vehicle is used for the disabled person’s personal needs.

[Read separate GOV.UK guidance on financial help if you’re disabled](https://www.gov.uk/financial-help-disabled/vehicles-and-transport) (<https://www.gov.uk/financial-help-disabled/vehicles-and-transport>).

Proof of receipt of a score of 8 points or more under the “moving around” activity of the mobility component of Personal Independence Payment.

4.9 An applicant in receipt of this award will have a decision letter from the Department of Work and Pensions. Under the mobility component section, the letter will describe the degree to which the applicant can ‘move around’.

For the applicant to be eligible for a Blue Badge 'without further assessment', their letter must describe their 'moving around' ability as one of the following:

- you can stand and then move unaided more than 20 metres but no more than 50 metres. (8 points);
- you can stand and then move using an aid, or appliance, more than 20 metres but no more than 50 metres. (10 points)
- you can stand and then move more than 1 metre but no more than 20 metres either aided or unaided. (12 points)
- you cannot stand, aided or unaided, or move more than 1 metre. (12 points)

AFIP awards do not entitle the applicant to be eligible for a Blue Badge 'without further assessment'. The applicant will need to meet one of the other "without further assessment" criteria or apply under the eligible 'subject to further assessment' route.

4.10 Awards may be for a fixed period or "ongoing". They are all subject to review and therefore old award letters may not be reliable indicators of current eligibility. If the award letter is more than 12 months old, we recommend you check the validity of the PIP decision letter by calling the PIP Enquiry Line on 0800 121 4433.

4.11 If the applicant has lost their PIP decision letter, then they should be advised to contact DWP for a replacement by:

- telephone: 0800 121 4433
- textphone: 0800 121 4493

4.12 This helpline is open from 8am to 6pm Monday to Friday, and further details can be found on the [relevant GOV.UK pages \(https://www.gov.uk/PIP\)](https://www.gov.uk/PIP).

4.13 If the applicant submits a document as proof of evidence that does not specify the descriptor through which they are in receipt of PIP, the local authority should not issue a Blue Badge.

Proof of receipt of a score of 10 points under Activity 11, descriptor E of the "planning and following a journey" activity of the mobility component of Personal Independent Payment.

4.14 An applicant in receipt of this award will have a decision letter from the Department of Work and Pensions. Under the planning and following a journey section, the letter will describe the barriers claimants may face that are associated with mental, cognitive, or sensory ability when making a journey. For the applicant to be eligible for a Blue Badge without further assessment, they must receive the following descriptor: "Cannot undertake

any journey because it would cause overwhelming psychological distress to the claimant” (10 points). No other descriptor will qualify.

4.15 Awards may be for a fixed period or “ongoing”. They are all subject to review and therefore old award letters may not be reliable indicators of current eligibility. If the award letter is more than 12 months old, we recommend you check the validity of the PIP decision letter by calling the PIP Enquiry Line on 0800 121 4433.

4.16 If the applicant has lost their PIP decision letter, then they should be advised to contact DWP for a replacement by:

- telephone: 0800 121 4433
- textphone: 0800 121 4493

4.17 This helpline is open from 8am to 6pm Monday to Friday, and further details can be found online on the relevant [GOV.UK pages](https://www.gov.uk/pip) (<https://www.gov.uk/pip>)

4.18 If the applicant submits a document as proof of evidence that does not specify the descriptor through which they are in receipt of PIP, the local authority should not issue a Blue Badge.

Proof of being registered blind (severely sight impaired)

4.19 An applicant who is registered blind (now officially referred to as “severely sight impaired”) will often be registered with the local authority’s social services department (or their agents). However, local authority administrators should note that registration is voluntary.

The formal notification required to register as severely sight impaired is a Certificate of Vision Impairment (CVI) signed by a consultant ophthalmologist. The CVI was formerly known as the ‘BD8’ form. The individual should have a copy of their CVI and should be encouraged to register [\[footnote 10\]](#) if they have not already done so as they may also be entitled to other benefits.

Proof of receipt of the War Pensioner’s Mobility Supplement (WPMS)

4.20 An applicant receiving the WPMS will have an award letter from Veterans UK [\[footnote 11\]](#). They can be contacted by:

- email: veterans-uk@mod.gov.uk
- freephone (UK only): 0808 1914 2 18

4.21 This helpline is normally open 8am - 5pm Monday to Friday

4.22 More information is available on the [Veterans UK website](https://www.gov.uk/government/organisations/veterans-uk) (<https://www.gov.uk/government/organisations/veterans-uk>).

Proof of both award of a lump sum benefit at tariffs 1-8 of the Armed Forces and Reserve Forces (Compensation) Scheme and certification of having a permanent and substantial disability which causes inability to walk or very considerable difficulty whilst walking.

4.23 An applicant with the above award and certification will have an award letter from Veterans UK [\[footnote 12\]](#) confirming that they are in receipt of tariffs 1-8 under the Armed Forces and Reserve Forces (Compensation) Scheme Order 2011 [\[footnote 13\]](#) which also states that they have been certified as having an “permanent and substantial disability which causes inability to walk or very considerable difficulty whilst walking.”

4.24 Local authorities can verify the eligibility of an applicant by contacting Veterans UK on 0808 1914 2 18.

4.25 To streamline administration when verifying an applicant’s proof of entitlement, local authorities should consider using electronic records held on the applicant by other council departments and agencies, where such records are accessible and up to date. Applicants must give their consent to sharing any personal information for a secondary purpose under the Data Protection Legislation.

This consent can be sought in the ‘declaration’ section of the Blue Badge application form. It is hoped, in time, that the Blue Badge Digital Service will include automatic checks with DWP to establish whether applicants are in receipt of the relevant HRMCDLA or PIP award.

Case Study - Proof of Eligibility

Brighton and Hove City Council’s Blue Badge team are able to check that an applicant is on the council’s Blind Register. Having obtained specific consent from people applying under this criterion through the application form, the officers are able to cross-check the records held in another council department.

This approach has several benefits, including a simplified and quicker application process for severely sight impaired people who have registered their impairment with the local authority and less staff time spent chasing and scanning paper CVI forms.

Type 2: 'Eligible subject to further assessment'

The 'eligible subject to further assessment' criteria

4.26 People who may be issued with a badge after further assessment are those who are more than three years old and may be described as one or more of the following:

- a person who drives a vehicle regularly, has a severe disability in both arms and is unable to operate, or has considerable difficulty in operating, all, or some types of parking meter; or
- a person who has been certified* by an expert assessor as having an enduring and substantial disability which causes them, during the course of a journey, to be unable to walk, experience very considerable difficulty whilst walking, which may include very considerable psychological distress
- in addition, they may be at risk of serious harm when walking - or pose, when walking, a risk of serious harm to any other person

4.27 Persons needing such certification are those in whose case a local authority does not consider it self-evident that they fall within these descriptors. (See regulation 4 (3A) of the Disabled Persons (Badges for Motor Vehicles) (England) Regulations 2000. (S.I.2000 No.682) [\[footnote 14\]](#) .

If it is not self-evident to a local authority on the basis of the information available to them, from the applicant and health or social care practitioners, whether the applicant falls within these descriptors, then a referral should be made to an expert assessor for certification.

4.28 Any of the above three types of difficulty whilst walking could potentially be caused by a physical disability, or by a non-visible ('hidden') disability. In either case, the disability experienced by the applicant must endure for at least three years.

4.29 In addition, children under the age of three may be eligible for a badge if they fall within either or both of the following descriptions:

- a child who, on account of a condition, must always be accompanied by bulky medical equipment which cannot be carried around with the child without great difficulty
- a child who, on account of a condition, must always be kept near a motor vehicle so that, if necessary, treatment for that condition can be given in the vehicle or the child can be taken quickly in the vehicle to a place where such treatment can be given

4.30 These criteria are defined in regulation 4 of the Disabled Persons (Badges for Motor Vehicles) (England) Regulations 2000 (S.I. 2000 No. 682) as amended by The Disabled Persons (Badges for Motor Vehicles)

(England) (Amendment) (Regulations) 2019 (S.I. 2019 No. 891) [\[footnote 15\]](#). The latter SI also amends regulation 2 (which defines the role of an 'expert assessor', discussed in paragraph 4.31).

These changes seek to ensure that difficulties experienced by people with non-visible disabilities, whilst walking as part of a journey, are taken into full consideration by local authorities when determining the eligibility of applicants for a Blue Badge.

4.31 Consequently, some previously-used terms have changed in the regulations, and in guidance. DfT's interpretation of key revisions is as follows:

- expert assessor is a specific definition, which replaces that of independent mobility assessor. It still allows for mobility assessments to be done impartially, but now allows for a wider range of medical or healthcare professionals capable of certifying eligibility due to non-visible disabilities
- It removes the absolute requirement for independence, recognising that for non-visible disabilities especially, it may be that only a professional with a close knowledge of the applicant's case history could certify their disability for the purpose of their Blue Badge application
- enduring and substantial disability - this change, from 'permanent and substantial disability', recognises that some disabilities, particularly those which affect cognitive function and mental capabilities, may vary with continued personal development or in response to treatment, but endure nonetheless. Blue Badges may therefore be awarded to an individual with a disability that is expected to endure in some way for the three-year badge issue period
- very considerable difficulty whilst walking reflects that, for some people with non-visible ('hidden') disabilities, problems occur when they are walking during the course of a journey, rather than as a direct result of the physical act of walking. This subtle change in wording allows for such problems to be considered as reaching the level of 'difficulty' which qualifies them for a Blue Badge, while maintaining eligibility for people whose difficulties are more directly linked to the physical problems they have with walking itself, and/or any pain they experience whilst walking, or as a result of the effort of walking. The words 'very considerable difficulty' may be understood as suggesting that the purpose of issuing a Badge should be to enable the applicant to undertake journeys that would not otherwise be possible, or which are only possible with very considerable difficulty
- very considerable psychological distress has been included as an example of the kind of difficulty an individual may experience when they are walking during the course of a journey, which can be unrelated to their physical ability to walk

- risk of serious harm reflects that some non-visible ('hidden') disabilities give rise to behaviour or lack of situational awareness that present safety risks for the disabled person or for others. Where an expert assessor certifies that an applicant has an enduring and substantial disability which causes them to be at risk of serious harm in this way, then the local authority may issue a badge to them

The expert assessor role

4.32 The role of an applicant's personal GP in badge eligibility decision making has been reduced considerably since the implementation of reforms to the Blue Badge Scheme enacted by the DfT in 2012. These reforms helped to ensure greater independence of assessment, improved the consistency and fairness of assessment outcomes, and contributed to a reduction in the total number of Blue Badges on issue. The widespread use of independent mobility assessments was central to this outcome.

4.33 Independent mobility assessments were typically undertaken by occupational therapists (OTs) and physiotherapists, specifically trained in mobility issues and who were independent of the applicant.

4.34 Following the 2019 revisions to the scheme eligibility criteria, the expert assessor role (previously carried out by independent mobility assessors) will continue to allow for such impartial mobility assessments as typically undertaken by OTs and physiotherapists. The DfT envisages that local authorities will continue to draw upon them as they currently do; to help them determine (relative to the published scheme criteria) the eligibility of applicants whose difficulty whilst walking relates primarily to physical factors they experience during the course of a journey.

4.35 However, these kinds of mobility assessments may be less appropriate for some people with non-visible ('hidden') conditions – who may be able to walk, but who experience, during the course of a journey, another very considerable difficulty whilst walking or pose a risk of serious harm to themselves or others when walking. Therefore, the broadened title of 'expert assessor' is intended to enable local authorities to draw upon a wider range of professionals with closer knowledge of the applicant's case history to certify eligibility when required.

4.36 In respect of physical disabilities and/or non-visible ('hidden') conditions, only where a local authority cannot satisfy itself that an applicant meets, or does not meet, the eligibility criteria, based on the evidence provided by the applicant would it be expected to appoint an 'expert assessor'. Most applicants would reasonably be expected to demonstrate a health/social care history that is consistent with having an enduring and substantial disability that causes them very considerable difficulty when

walking between a vehicle and their destination, therefore it is anticipated that appointing an expert assessor would be by exception.

4.37 The role defined in regulation 2(1) of the Blue Badge scheme regulations [\[footnote 16\]](#) confirms that an expert assessor needs to be someone who is recognised by the local authority to which the application for a disabled person's badge:

- is recognised as having a professional qualification recognised in the United Kingdom which enables them to diagnose, treat, or provide specialised therapeutic services to people with the same, or a similar, disability to that of the applicant; and
- is recognised as having the necessary expertise to assess the presence, in the applicant, of any of the effects listed at paragraph 4.26, resulting from their disability on their capacity to walk during the course of a journey
- is not employed or engaged by any person as a general practitioner (GP) for the provision of medical services to the applicant
- is not, in the opinion of the local authority, precluded by reason of their relationship with the applicant from providing an impartial assessment of whether or not the applicant meets the prescribed criteria at paragraph 4.26

4.38 The table below lists the range of expert healthcare professionals consulted through the course of an independent research study conducted on behalf of the DfT in 2019. It has been included here to provide an example of the types of disciplines and specialisms that local authorities may need to draw upon when determining the eligibility of Blue Badge applicants.

Table 4.1 Types of Disciplines and Specialisms

Disciplines	Specialisms
Clinical Psychologist	ASD and Asperger's Syndrome
Educational Psychologist	Child and adolescent mental health for children with special educational and additional complex needs, ASD and Asperger's Syndrome
Gastroenterologist	Crohn's Disease, Ulcerative Colitis, Inflammatory Bowel Diseases
Neurologist	Paediatric Neurodisability, ASD, ADHD, learning problems, behavioural and associated mental health, Seizures, Epilepsy, Amnesia, neuropathic pain

Disciplines	Specialisms
Occupational Therapist	Wide range of conditions, most commonly difficulties due to mental health illness, physical or learning difficulties. Commonly facilitate independent mobility assessments on behalf of local authorities
Physiotherapist	Ehlers-Danlos Syndrome, Huntington's Disease, M.E. / CFS, major trauma. Transverse Myelitis. Commonly facilitate independent mobility assessments on behalf of local authorities
Psychiatrist	Older peoples' mental health, applied health research & policy, ASD and other complex mental health disorders in children, young people, adults
Rheumatologist	Paediatric rheumatology, pain management, Lupus, general rheumatology, inflammatory arthritis

4.39 This is not considered to reflect an exhaustive list and, in all cases, a Blue Badge issuing authority will need to satisfy itself that any expert assessors involved in formally confirming (referred to as "certification" under the legislation) an applicant's eligibility under the 'subject to further assessment' criteria are suitably qualified.

4.40 The final decision on eligibility is for the issuing authority to make, drawing on the information provided, and where applicable, the expertise purveyed by the expert assessor. The DfT has no power to intervene in decisions in individual cases.

4.41 Each application should be considered solely on its merits in relation to the scheme eligibility criteria, regardless of condition.

Assessing people who are unable to walk during the course of a journey

4.42 To qualify under this criterion, an applicant must have any enduring (lasting for at least three years) and substantial disability that means they are unable to walk during the course of a journey.

Assessment procedures are for local authorities to determine, but they may wish to take account of the following:

- being unable to walk means that they cannot take a single step

- the applicant needs to show that, because of their enduring and substantial disability, they cannot walk during the course of a journey
- walking involves always having one foot on the ground

4.43 If the applicant's only way of getting about is to swing through two elbow crutches, then they will be considered unable to walk (provided it is due to an enduring and substantial disability and not due to a temporary impairment, such as their legs being in plaster).

4.44 Ultimately, it is a matter for each individual local authority to adopt an assessment approach that they believe complies with the legislation and that best suits their circumstances.

Assessing people who experience very considerable difficulty whilst walking, which may include very considerable psychological distress

4.45 To qualify under this criterion, an applicant must have any enduring (lasting for at least three years) and substantial disability that means they have, during the course of a journey, very considerable difficulty whilst walking, which may include very considerable psychological distress.

4.46 The DfT expects that, in the context of walking disabilities that are predominantly physical in nature, very considerable difficulty whilst walking is likely to manifest through one or more of the following:

- the level of pain experienced by an individual when they are walking, or as a consequence of walking
- the degree of breathlessness they incur when, or as a result of, walking
- the distance over which an individual is able to walk
- the speed at which an individual is able to walk
- the length of time that an individual is able to walk for
- the manner in which the applicant walks
- an applicant's use of walking aids
- the applicant's outdoor walking ability
- whether the effort of walking presents a danger to the applicant's life or would be likely to lead to a serious deterioration in their health

4.47 An applicant might also meet this criterion if they experience very considerable psychological distress whilst walking as part of a journey.

The applicant has very considerable difficulty (whilst) walking, which may include very considerable psychological distress.

4.48 The applicant will need to show that, as a result of their enduring and substantial disability, they are unable to walk very far without experiencing severe difficulty; and that their inability to walk is affected to the extent that they would be unable to access goods and services unless allowed to park

close to shops, public buildings, and other facilities. Several factors may be relevant to determining this:

Excessive pain reported by the applicant whilst walking, or as a consequence of the effort of walking.

Pain is subjective, and some people have higher pain thresholds than others. Consideration may need to be given to cross-referencing an applicant's reported experience of pain with information they provide about their enduring and substantial disability, details of medication they take, coping strategies they have adopted, and any courses of treatment designed to help them manage their pain.

Any breathlessness reported by the applicant whilst walking, or as a consequence of the effort of walking.

The applicant's reported breathlessness may need to be cross-referenced with details of diagnosed medical conditions known to cause breathlessness (for example, emphysema) and any observations of the applicant's respiratory rate during a mobility assessment.

4.49 It does not matter whether excessive pain or breathlessness occurs at the time of walking, or later - what counts is that it is a direct result of their attempt to walk.

4.50 The distance an applicant is able to walk without excessive pain or breathlessness; taking due consideration of the environment the individual usually walks:

- if an applicant is unable to walk 30 metres (33 yards) in total, then their walking ability is not appreciable, and they can be deemed as having very considerable difficulty in walking'
- the applicant may be deemed eligible if they can walk 30-80 metres (33-87.5 yards) without pain or breathlessness, but demonstrate very considerable difficulty in walking through a combination of other factors - for example, extremely slow pace and/or their manner of walking
- applicants who can walk more than 80 metres (87.5 yards) and do not demonstrate very considerable difficulty in walking through any other factors would not be deemed as eligible

4.51 The speed at which they are able to walk. As a guide, a typical adult can walk in a minute:

- brisk pace - >90 metres per minute
- normal pace - 61-90 metres per minute
- slow pace - 40-60 metres per minute
- very slow pace - <40 metres per minute

4.52 If an applicant cannot walk 40 metres (44 yards) in a minute (a pace of less than 0.67 metres/second), including any stops to rest, then this is an extremely slow pace which is likely to make walking very difficult when considered in isolation.

4.53 If an applicant can walk 40 metres (44 yards) in less than a minute (a pace of 0.67 metres/second or more), including any stops to rest, then the speed at which they walk is not likely to make walking very difficult when considered in isolation. The applicant may still be considered eligible if they demonstrate very considerable difficulty walking through any other factors.

4.54 The length of time that an applicant is able to walk for. For example, if an applicant is only able to walk for less than one minute in total then walking is likely to be very difficult for them.

4.55 The manner in which the applicant walks. The applicant's posture, rhythm, coordination, balance, and stride should be considered in terms of the degree of effect they have on their ability to walk.

4.56 An applicant's use of walking aids:

- the fact that a walking aid is or is not used may be relevant to the eventual decision, but this alone should not determine whether or not a Blue Badge is issued
- for example, if a person can walk relatively normally with the use of an artificial leg or walking stick, then they should not be considered as eligible to receive a Blue Badge
- it may be pertinent to consider whether an applicant is using any walking aids in a correct manner when determining whether they have very considerable difficulty in walking
- it may also be pertinent to consider whether an applicant who is not using any form of walking aid at the time of their application could improve their walking ability, to the extent that they would no longer demonstrate very considerable difficulty in walking, through the correct use of such an aid.

4.57 The applicant's outdoor walking ability

- It is important to consider the person's ability to negotiate the types of pavement or road one would normally expect to find in the course of walking outdoors. No pavement or road is absolutely flat therefore a degree of "incline" and "decline" should be considered in the course of a mobility assessment
- It is not necessary for the assessment to be completed outdoors. However, it is important the assessment enables the healthcare professional conducting the mobility assessment to determine how the applicant would cope with walking outdoors based on their indoor walking ability

4.58 Whether the applicant has very considerable psychological distress whilst walking during the course of a journey.

It is considered good practice for Blue Badge application processes to allow for people to:

- explain in their own words how their disability affects them whilst walking
- respond to closed experiential questions about how their disability affects them whilst walking
- identify any coping strategies they use, and how effectively these work in practice
- document any treatment or medication they receive to help them manage their condition
- identify the names and contact details of any health or social care practitioners involved in their diagnosis and ongoing treatment
- provide any relevant supporting evidence, for example such as: diagnosis letters, care plans, patient summaries, education health and care (EHC) plans or disability benefits
- explain how they experience very severe or overwhelming anxiety (for example, through hypervigilance)
- explain how they experience an overwhelming sense of fear of public/open/busy spaces
- explain why they avoid some/all types of journeys due to the kinds of experiences listed above

4.59 Whether the effort of walking presents a danger to the applicant's life or would be likely to lead to a serious deterioration in their health.

- the applicant needs to show that they should not walk very far because of the danger to their health;
- this element is intended for people with serious chest, lung or heart conditions who may be physically able to walk normally
- the serious deterioration does not need to be permanent, but it should require medical intervention for them to recover
- they will need to show that any danger to their health is a direct result of the effort required to walk

4.60 Ultimately, it is a matter for each individual local authority to adopt an assessment approach that they believe complies with the legislation and that best suits their circumstances.

Assessing people at risk of serious harm, when walking, or pose, when walking, a risk of serious harm to themselves or any other person.

4.61 To qualify under this criterion, an applicant must have any enduring (lasting for at least three years) and substantial disability that means they

are, during the course of a journey, at risk of serious harm, when walking, or pose, when walking, a risk of serious harm to themselves or any other person.

4.62 The DfT expects that, in the context of disabilities that are predominantly non-visible ('hidden') in nature, a risk of serious harm to self/others could manifest as one or more of the following behaviours:

- becoming physically aggressive towards others, possibly without intent or awareness of the impact their actions may have
- refusing to walk altogether, dropping to the floor, or becoming a dead-weight
- wandering off or running away, possibly without awareness of surroundings or their associated risks (for example, nearby roads, car park environments)
- disobeying, ignoring and/or being unaware of clear instructions
- experiencing very severe or overwhelming anxiety (for example, through hypervigilance)
- experiencing an overwhelming sense of fear of public/open/busy spaces
- experiencing serious harm or causing harm to others
- avoiding some/all types of journeys due to the kinds of experiences listed above

4.63 This list is not exhaustive and local authorities will need to satisfy themselves that the risk of serious harm to self or others when walking, during the course of a journey, is caused by an enduring and substantial disability.

In this context it is recognised that some of the listed behaviours, as well as others, may be exhibited ordinarily by children who do not have any enduring or substantial disability. It is therefore important for local authorities to consider the extent of any such behaviours and/or difficulties experienced by an applicant in relation to common developmental milestones.

4.64 Local authorities will also need to be satisfied that such difficulties cannot otherwise be managed through reasonable coping strategies. For example, where an applicant would only ever be accompanied by another person and that negates 'very considerable' difficulty, a badge would not help the applicant.

4.65 In considering coping strategies, local authorities should consider whether existing strategies are being adopted and are effective (i.e. they may work, but they may require significant time to be invested on the part of the applicant), and whether a Blue Badge would be an effective 'coping strategy' in its own right. Importantly, journey avoidance should not be considered an appropriate coping strategy.

4.66 Ultimately, it is a matter for each individual local authority to adopt an assessment approach that they believe complies with the legislation and that best suits their circumstances.

Assessing people with severe disability in both arms

4.67 This criterion is intended to cover disabled drivers who, because of a severe disability in both of their arms, are unable, or find it very difficult, to use on-street parking equipment.

4.68 When making an assessment under this criterion, local authorities will need to consider whether the applicant meets all of the following:

- regularly drives an adapted or non-adapted vehicle
- has a severe disability in both arms
- is unable to operate, or has considerable difficulty operating, all or some types of parking meter

4.69 For this purpose, a 'parking meter' includes a machine for issuing pay-and-display tickets which shows that a charge has been paid and the period of parking paid for, as well as a parking meter which itself indicates that a charge has been paid and whether the period paid for has expired.

4.70 Only a very small number of people are likely to qualify under this criterion. In no circumstances should anyone who does not satisfy all three of the conditions set out above receive a badge. In particular, a badge should not be issued to a person who travels solely as a passenger or to a person who only has difficulty carrying parcels, shopping, or other heavy objects such as luggage.

4.71 Most drivers with disabilities in both arms drive an adapted vehicle and should be able to provide vehicle registration or insurance documents which contain statements to this effect. In addition, applicants who have registered their adapted vehicle with the DVLA will be able to present their driving licence which will contain codes that refer to the modifications made to the vehicle. These can be found on the reverse of a photocard driving licence (under category 12, information codes).

The following driving licence codes are relevant to this criterion:

- 40 - adapted steering
- 79 - restricted to vehicles in conformity with the specifications stated in brackets

4.72 Where the applicant does not have an adapted vehicle, only drivers with the most severe disabilities in both of their arms (i.e. who cannot operate a parking meter) should be considered eligible.

This may cover disabled people with, for example:

- a limb reduction deficiency of both arms
- bilateral upper limb amputation
- muscular dystrophy
- spinal cord injury
- motor neurone disease
- a condition of comparable severity

Assessing children under the age of three

4.73 Since 17 June 2011, children under the age of three have been eligible for a badge if they fall under either or both of the following criteria:

- a child who, on account of a condition, must always be accompanied by bulky medical equipment which cannot be carried around with the child without great difficulty
- a child who, on account of a condition, must always be kept near a motor vehicle so that, if necessary, treatment for that condition can be given in the vehicle or the child can be taken quickly in the vehicle to a place where such treatment can be given

4.74 Examples of children under the age of three likely to fall into the criterion mentioned in the first bullet point may be those who need to be accompanied at all times by any of the following types of equipment:

- ventilators - drive air through a tube placed into the windpipe. They blow oxygen-enriched air gently into the lungs through a tube that is passed through the mouth or nose, or via a tracheostomy
- suction machines - are portable suction apparatus used for aspirating fluids and vomit from the mouth and airway by sucking the material through a catheter into a bottle using a vacuum pump (piston, diaphragm, or rotary vane), bacterial filter, vacuum gauge, trap for moisture (or any debris accidentally drawn into the mechanism), a reservoir for the aspirated material, and a suction catheter or nozzle
- feed pumps - deliver fluid feeds via nasogastric tube to the child's stomach
- parenteral equipment - services intravenous lines providing nutrition if a child is unable to take food or fluids through his or her mouth. The line can also be used for injecting medication

- syringe drivers - are used to deliver medication by intravenous injection (for example, antibiotics), or by subcutaneous injection (for example, insulin to control diabetes) this can be given by using a small pump known as a syringe driver. A syringe is attached to the syringe driver and the drug is released through a small needle
- oxygen administration equipment - consists of a tank and regulator with supply equipment for oxygen; mask or nasal prongs and tubing
- continuous oxygen saturation monitoring equipment - involves a device usually strapped to the child's foot or hand. This shines light through the skin and monitors the amount of oxygen in the blood. It is used to monitor where a child may need access to oxygen
- casts and associated medical equipment for the correction of hip dysplasia
- between birth and six months of age, a brace called a Pavlik Harness is often used to hold the baby's hips in position

The Pavlik harness is made of canvas, with straps, velcro, and buckles. From six months and over a child is often placed in a Spica cast after surgery. A Spica cast can be either plaster or fibreglass and will encase the child from the chest down to cover one leg or both. In both cases the apparatus is likely to be deployed for a period of up to three months per hip.

4.75 Examples of children with highly unstable medical conditions who need quick access to transport to hospital or home and are likely to qualify under the criterion are set out below. This group may also need to stop to perform an urgent medical procedure for example, suction of a tracheostomy tube:

- children with tracheostomies
- children with severe epilepsy/fitting
- children with highly unstable diabetes
- terminally ill children who can only access brief moments of outside life and need a quick route home

4.76 DfT recommends that local authorities treat each application for children under the age of three as a special case. This may mean making arrangements to see the child, although this should not be necessary if the child's paediatrician is able to write a letter outlining the child's medical condition and any special equipment they need to use. A medical assessment should not be necessary.

4.77 Local authorities should make it clear when issuing the badge that it should be returned to them on expiry or if the recipient no longer needs it because the condition under which it was issued no longer applies. This is particularly relevant in the case of children with hip dysplasia, as this condition normally lasts between three and six months.

4.78 Local authorities should note that the lists provided above are indicative only and are not intended to be exhaustive in order to allow for new advances in technology and treatment equipment.

General principles

General guidance on assessing and determining eligibility

4.79 Eligibility under the Blue Badge scheme criteria should be carefully assessed to maximise the fairness and consistency of badge issue across England. Local authorities should also keep a record of the procedures used and the outcome of the assessment process. This will help the authority to provide greater transparency to applicants and to demonstrate that correct procedures have been followed in event of a complaint to the Local Government Ombudsman.

4.80 Aside from cases where an applicant is unable to walk; i.e. that they cannot walk during the course of a journey, it should be remembered that “very considerable difficulty whilst walking” and “serious harm” during the course of a journey are high thresholds that should be applied to all applicants equally, whether their disability is visible or non-visible (‘hidden’).

4.81 When considering whether an individual may qualify for a Blue Badge, local authorities must recognise that the following could arise due to non-visible (‘hidden’) considerations – such as those described in Table 4.1:

- unable to walk
- very considerable difficulty whilst walking during the course of a journey, which may include very considerable psychological distress
- risk of serious harm, when walking during the course of a journey, or pose, when walking, a risk of serious harm to any other person

4.82 It is important that local authorities give both physical and non-visible (‘hidden’) enduring and substantial disabilities which cause walking difficulty due consideration when determining an applicant’s eligibility in relation to the ‘subject to further assessment’ criteria.

4.83 Such applicants may experience developmental, behavioural, or mental health conditions which could make answering questions or completing an in-person mobility assessment overwhelmingly stressful or intimidating. The range of physical tests typically conducted during an in-

person mobility assessment may also not be relevant as a means of demonstrating the underlying difficulty that some individual experiences when walking.

4.84 Where it is apparent this might be the case (for example, from the behaviours and/or disabilities described in an individual's completed Blue Badge application form), local authorities are encouraged to follow a more appropriate eligibility assessment approach, such as based on that outlined in paragraphs 4.45 to 4.60 in this guidance.

4.85 However, these non-visible ('hidden') conditions manifest themselves, to qualify for a Blue Badge the extent of the effects experienced by the applicant must be such that they amount to very considerable difficulties or a risk of serious harm to themselves or others, whilst walking during the course of a journey.

For example, this may mean they are unable to access goods and services without very considerable difficulty, or by placing themselves or others at risk of serious harm, unless allowed to park close to shops, public buildings, and other facilities.

4.86 Research commissioned in 2019 by the DfT to support the development of this guidance suggested that it could be reasonable for local authorities to consider that the frequency with which an applicant experiences very considerable difficulty whilst walking during the course of a journey, or presents a risk of serious harm to themselves/others when walking during the course of a journey, should be 'more often than not' when determining eligibility for a Blue Badge.

4.87 Local authorities should not expect applicants to 'self-identify' the basis upon which they may qualify for a Blue Badge under the 'subject to further assessment' criteria.

This is particularly pertinent in view of the 2019 revisions to the scheme eligibility criteria, which introduce the possibility for individuals to qualify to receive a badge on account of enduring and substantial disabilities causing individuals to experience 'very considerable difficulty whilst walking', during the course of a journey, rather than solely their ability to walk.

The DfT's view is that, for 'subject to further assessment' applications, local authorities will:

- continue to cross-check local authority health and social care records wherever possible and subject to the relevant consents being received from a Blue Badge applicant, to seek evidence of eligibility/non-eligibility in relation to the 'subject to further assessment' criteria
- continue to reflect on all the evidence available to them in respect of an individual's application for a Blue Badge in relation to all the eligibility criteria listed at the beginning of this section

- recognise that the ‘subject to further assessment’ criteria are not mutually exclusive, and that an individual’s eligibility to receive a badge may need to be assessed in relation to more than one criterion (for example, in cases where physical walking difficulties also cause or are accompanied by very considerable psychological distress and/or risk of harm to the applicant/others)
- recognise that a distinction can be made between the professional roles involved in the diagnosis of a substantial and enduring disability, and those involved in the on-going treatment and support to help individuals to live with their disabilities
- recognise that professionals involved in the on-going treatment and support of an individual whose experience of non-visible (‘hidden’) disability may qualify them for a Blue Badge are more likely to be familiar with the applicant’s lived- experience of the condition
- seek to draw upon the most relevant expert advice and insight, so as to inform an accurate and consistent eligibility assessment and determination of each application on its merits in relation to the specific scheme criteria – not on a “one size fits all” basis

4.88 Referral to an ‘expert assessor’ is unnecessary when a local authority determines that, from the information that they have about the applicant, it is self-evident that the applicant does, or does not, meet one of the ‘subject to further assessment’ eligibility criteria, for example that the applicant is clearly eligible or ineligible and further assessment would not assist the local authority in determining eligibility. The reason for this is that it would be overly burdensome for both local authorities and for applicants to require further assessment in cases where an applicant’s disability means that they are clearly eligible or ineligible.

4.89 Other general considerations for local authorities to consider when determining badge applications in relation to the ‘subject to further assessment’ criteria include:

- an applicant’s ability to carry parcels and luggage, or to follow a journey independently, are not to be considered
- it is not appropriate to refuse an applicant a Blue Badge solely on the basis that a future medical intervention could improve their mobility

If, at the time of assessment, the applicant is deemed to have a substantial disability that will last for at least three years (for example, is enduring) which causes them, during the course of a journey, to suffer one of the prescribed effects, then they should be issued with a badge and reminded of their duty to return it if their mobility improves:

- that eligibility for the Blue Badge scheme is not solely determined by the presence or absence of any particular diagnosis or condition. People may be deemed eligible for a badge if they have an enduring and substantial disability which causes them, during the course of a journey, to be unable

to walk, experience very considerable difficulty whilst walking and/or pose a risk of serious harm to themselves or others when walking

- local authorities should, on a case-by-case basis, consider the extent to which a Blue Badge will assist an applicant with the nature of difficulty they experience whilst walking

The primary benefit conferred on a Blue Badge holder is the ability to park close to a destination. If this will not assist an applicant with the difficulties they experience, then a local authority should consider this in its eligibility decision-making.

4.90 Local authorities can choose to accept evidence from GPs in support of applications, provided this is not the only source of evidence that is used to determine the eligibility of a Blue Badge application. A GP cannot fulfil the role of 'expert assessor'. As such, input from an applicant's own GP may be considered helpful where it contextualises the applicant's lived experience of their disability in the absence of input from other suitably qualified health or social care professionals.

4.91 The final decision about whether an applicant meets the criteria is for the issuing authority to make. The DfT has no power to intervene in eligibility decisions in individual cases.

Seeking insights that corroborate information provided by applicants

4.92 A potential approach to considering applications from applicants who may qualify for a Blue Badge as a result of the impact their non-visible ('hidden') disability has when they walk during the course of a journey is discussed in paragraphs 4.45 to 4.66. A key distinction from the mobility assessment approach is that people who experience non-visible ('hidden') conditions may be more likely to require an assessment approach tailored to the nature of their disability and the way it affects them whilst walking, during the course of a journey.

4.93 Independent research conducted on behalf of the DfT in 2019 involved in-depth engagement with expert medical advisors, local authority Blue Badge teams, the Department for Work and Pensions (DWP) the Department of Health and Social Care (DHSC), and disabled people's representative groups. Potential processes for determining eligibility were considered and a consensus view developed, based on the expert advice available and insights into current local authority practices for determining eligibility of predominantly non-visible ('hidden') walking disabilities.

4.94 While this guidance is non-statutory and does not constitute legal advice, the suggested approach outlined below reflects the findings from the 2019 study. This has not been piloted, but closely aligns with that developed and implemented by some members of an executive management group of local authority Blue Badge administrators and their health and social care practitioners who are routinely involved in conducting Blue Badge eligibility assessments.

4.95 Assessment procedures are for local authorities to determine, but they may wish to take account of the following, which represents the group's findings.

Collating relevant information through the application process

4.96 The range of potential non-visible ('hidden') conditions which cause difficulty whilst walking is broad, and they can affect people differently - both in isolation, and in combination with other conditions.

4.97 Consequently, it is considered good practice for Blue Badge application processes to allow for people to:

- explain in their own words how their disability affects them whilst walking during the course of a journey
- respond to closed experiential questions about how their disability affects them whilst walking during the course of a journey
- identify any coping strategies they use, and how effectively these work in practice
- document any treatment or medication they receive to help them manage their disability

Identify the names and contact details of any health or social care practitioners involved in their diagnosis and ongoing treatment. Provide any relevant supporting evidence, such as: diagnosis letters, care plans, patient summaries, education health and care (EHC) plans or disability benefits.

4.98 The model Blue Badge application form in [Appendix D](https://www.gov.uk/government/publications/the-blue-badge-scheme-local-authority-guidance-england) (<https://www.gov.uk/government/publications/the-blue-badge-scheme-local-authority-guidance-england>) includes such questions; similar questions will be reflected in the Blue Badge Digital Service online application form.

Validating information received and determining an appropriate assessment approach

4.99 Upon receipt of a completed Blue Badge application form, it is anticipated that the relevant local authority team will conduct an initial review to determine whether the behaviours/experiences identified could mean the applicant may qualify for a Blue Badge under any of the 'subject to further assessment' criteria.

4.100 For applicants who may qualify for a badge predominantly due to the impact that a non-visible ('hidden') condition has upon their ability to walk during the course of a journey, it is likely to be necessary to document an assessment approach that will be followed to determine their eligibility in relation to the relevant criteria.

This may differ across applicants, reflecting the information they have provided and the nature of disabilities they experience, but could include any combination of:

- contacting the applicant, or the person who completed the application form on their behalf for further information
- cross-checking existing local authority health and social care records (such as assessments for other benefits, social care, or other support), wherever possible, to validate information they have provided about their disability and its impact on them whilst walking during the course of a journey
- contacting medical, health/social care practitioners, memory clinics, schools, or others to seek further insight about the applicant's disability and how it affects them whilst walking during the course of a journey
- referring the applicant for an in-person assessment. In many cases, this approach is considered less likely to yield the required insight into how the applicant's disability affects them whilst walking during the course of a journey, and may therefore be less appropriate for persons who, whilst walking, experience very considerable psychological distress and/or present a risk of serious harm to themselves or others

4.101 Documenting the approach adopted for each individual applicant enables local authorities to evidence why they believe the most appropriate mechanism has been used for determining the applicant's eligibility. This may assist in the event of any subsequent challenge received in respect of either the outcome of a Blue Badge application, or the process followed by the local authority.

Seeking expert insight

4.102 In many cases, where an applicant's eligibility for a Blue Badge is being considered because of a non-visible ('hidden') condition, it is anticipated that a local authority should not require an in-person assessment with the applicant. However, there may be exceptional cases where certification by an 'expert assessor' is considered necessary or appropriate - either in addition to, or in place of, the collation of insights from health/social care professionals such as specialist nurses or social workers.

4.103 More commonly, it is expected that officers will require evidence from health/social care professionals involved in the care of an individual to confirm/validate:

- that the applicant has an enduring and substantial disability, such as that which they describe in their completed application
- whether, when walking as part of a journey, the applicant experiences very considerable difficulty whilst walking, which may include very considerable psychological distress
- where it may be unsafe for the applicant to walk far as they may pose danger to themselves, or the wellbeing of others

This element is intended to include people who experience serious behavioural difficulties and/or mental illnesses. People with epilepsy will need to show that any fits they have previously experienced are likely to occur when they are walking, and that parking close to their destination would reduce the likelihood of them occurring.

4.104 Local authorities may wish to prioritise insights from individuals who are registered with the Health & Care Professionals Council, or other appropriate professional bodies that are relevant to the specific disabilities that an individual experiences, where appropriate. Applicants or their advocates may be able to provide this evidence, however, a model proforma (see [Appendix H \(https://www.gov.uk/government/publications/the-blue-badge-scheme-local-authority-guidance-england\)](https://www.gov.uk/government/publications/the-blue-badge-scheme-local-authority-guidance-england)) has been developed to assist in seeking insights from health and social care professionals, which local authorities are free to adopt or adapt for use when they need to seek such insights.

4.105 Expert medical and social care professionals consulted through the 2019 research study indicated a preference for receiving a written request seeking their insight, accompanied by either a link to an online survey or a freepost return form for completion and return. They also suggested that a response timeframe of 4-6 weeks would be reasonable. In practice the most appropriate response mechanism, and timeframes, are expected to reflect the makeup of local authority health and social care arrangements.

4.106 Where the body of evidence provided in support of an application is insufficient to determine eligibility, the local authority should seek certification of eligibility from an expert assessor.

4.107 In some cases, it may be appropriate to seek additional insight from an applicant's GP, since they may be familiar with how the individual's non-visible ('hidden') disability affects them whilst walking. However, insight from the applicant's own GP cannot be the only source of evidence, nor can an applicant's GP fulfil the role of an 'expert assessor'.

4.108 The DfT expects that a badge would be issued where the body of evidence or certification by an expert assessor, support the case for eligibility.

Review of submitted information and expert assessor insights

4.109 The role of a decision maker at the local authority is expected to involve comparing all of the insights received from across the application form, supplementary information provided by the applicant, and statements as to how the applicant's disability manifests from medical and social care professionals familiar with the applicant such as a specialist nurse or care worker. In doing so they would seek to weigh the evidence of risk of harm or difficulty whilst walking during the course of a journey arising from a substantial and enduring non-visible ('hidden') disability.

They would also holistically consider the impact that combinations of enduring and substantial disabilities have upon the applicant and the difficulty they experience whilst walking during the course of a journey. This would also include consideration of whether the impact of walking presents a danger to the applicant's life or is likely to lead to a serious deterioration in their health to the point that medical intervention is required for them to recover.

4.110 The decision maker would typically document their decision on behalf of the local authority, including their reasoning, so that it may be communicated in writing to the Blue Badge applicant.

4.111 A local authority must satisfy itself that the individual(s) fulfilling the decision maker role are suitably qualified and trained to preside over these decisions. Experts engaged in the 2019 independent research study broadly agreed that a trained local authority administrator working in a Blue Badge team could fulfil this role, but that a local authority OT or physiotherapist (who may be better able to apply clinical reasoning in relation to the information received) may be better placed to consider more complex cases.

Local authorities may wish to consider sourcing, or creating, bespoke training modules (with input from OTs, physiotherapists, and other

healthcare professionals) to help upskill their admin teams when supporting this decision-making role.

4.112 Where the decision maker is unable to determine that the applicant is clearly eligible or clearly ineligible for badge, the application should be referred to an expert assessor for certification.

4.113 Core principles for seeking expert insight and applying it when determining an applicant's eligibility for a Blue Badge were developed and refined by a team of mobility and medical experts as part of the 2019 independent research study (see [Appendix G \(https://www.gov.uk/government/publications/the-blue-badge-scheme-local-authority-guidance-england\)](https://www.gov.uk/government/publications/the-blue-badge-scheme-local-authority-guidance-england)). Whilst assessment approaches are for local authorities to determine, they may wish to reflect upon these core principles when developing their approaches to determining the eligibility of people with non-visible ('hidden') disabilities.

Case Study - Determining eligibility

An executive management group of local authorities worked collaboratively to broaden their approach to determining Blue Badge eligibility under the 'subject to further assessment' criteria under the previous regulatory framework, so as to include people who experience very considerable difficulty whilst walking primarily due to non-visible ('hidden') disabilities. This approach has been adapted and implemented in different ways by local authorities, according to the council team within which the Blue Badge scheme administration function sits.

Kent County Council draws on trained administrative Blue Badge assessment assistants, two full-time OTs and a part-time physiotherapist. Between them the team has experience of physiology, child learning difficulties, in-patient and community-based forensic mental health, nursing, and mental health support.

Consequently, they can holistically consider all factors that impact upon each applicant's ability to walk during the course of a journey – including those arising as a result of primarily non-visible ('hidden') disabilities. The volume of Blue Badge applications is such that one of the OT roles is dedicated solely to undertaking Blue Badge assessments and advising on complex cases.

The council's core Blue Badge application form caters for applicants who experience a range of disabilities and is supplemented by a suite of more tailored 'request for further information' forms which more closely relate to the nature of impairment(s) that applicants experience and whether they are a child or an adult.

These forms can include broader sets of questions that seek to build-up a picture of the applicant's capabilities and daily challenges, in order to inform a decision on whether they meet the Blue Badge eligibility criteria. Complex cases are referred for a mobility assessment which can involve any combination of desk-based assessment, seeking further insight from health and social care professionals (where an applicant has not provided it) involved in an applicant's ongoing treatment, telephone follow-up with the applicant, and an in-person mobility assessment.

Under the previous Blue Badge Scheme, around 65% of all applications are 'subject to further assessment', with around half of these being referred for an impartial mobility assessment with the OT.

Hampshire County Council (HCC) has a team of ten trained administrators who undertake predominantly desk-based assessments. Around 125 more complex cases per month (~5% of total caseload) are reviewed by an expert panel that meets weekly and includes in-house OTs with expertise in the difficulties people experience because of both physical and non-visible ('hidden') disabilities. Impartial mobility assessments are undertaken by a HCC OT, in the event an applicant requests a review of their eligibility decision and after the review, the council still believes they do not qualify.

Applications for people with non-visible ('hidden') disabilities across all age groups and with a significant range of difficulties are considered/assessed, and for children in school, the council often draws on a section within an education, health and care plan (EHCP) dealing with communication and behaviour.

Replacing the statement of special educational needs; an EHCP is a legal document produced by local authorities across the UK to summarise any specialised support a child or young person requires in relation to their education, health, and social care.

It explains the extra help that will be given to meet these needs, and how that help will support the child or young person to achieve what they want to in their life. The local authority also typically seeks evidence of diagnosis of disability, from the applicant at the start of the application period, in the form of communication from appropriate healthcare professionals who are familiar with the applicant and their disability. Wherever possible this is sought from the applicant, through the application process.

Cross-checking of local authority records

4.114 Local authorities may be able to improve the efficiency of Blue Badge eligibility decision making by routinely checking existing council records to see whether there is sufficient existing evidence on an applicant to

determine whether an applicant is 'self-evidently' eligible and to award, or to refuse, a badge.

This can reduce the number of applicants with physical and/or non-visible ('hidden') enduring and substantial disabilities for whom certification from an expert assessor might be required. For such applicants, cross-checking typically involves investigating whether they have already undergone a related assessment of their disability or mobility with a different council department.

4.115 This approach may also be relevant for applicants whose inability to walk, or very considerable difficulty with walking during the course of a journey, arises due to non- visible ('hidden') disabilities.

4.116 The cross-checking approach can only be used effectively when a Blue Badge applicant has already been in contact with a local authority in connection with other services that could support their independent living. It is not appropriate to use it as the sole basis for determining the eligibility of all Blue Badge applicants under the 'subject to further assessment' 'walking criteria.

4.117 To ensure compliance with the General Data Protection Regulation (GDPR), local authorities are encouraged to consult guidance produced by the Information Commissioner's Office. This clarifies the steps local authorities need to take in order to share sensitive personal data between departments for secondary uses. For further information, please consult the Guide to Data Protection which is published by the Information Commissioners Office.

4.118 Appropriate declarations should be incorporated into the Blue Badge application form to enable applicants to give their permission to the local authority to access existing records, such as those held in adult social services or Council Tax departments.

4.119 The 2012 independent review resulted in the development of a set of 'core principles' for cross-checking the local authority records of Blue Badge applicants. This is available for reference at [Appendix E \(https://www.gov.uk/government/publications/the-blue-badge-scheme-local-authority-guidance-england\)](https://www.gov.uk/government/publications/the-blue-badge-scheme-local-authority-guidance-england).

Desk based assessments

4.120 A number of local authorities developed desk-based assessment tools under the previous Blue Badge scheme which could be carried over to the expanded regime to help determine the eligibility of Blue Badge applicants who may qualify for a Blue Badge under the 'subject to further assessment'

criteria relating to enduring and substantial disabilities that are physical in nature and which lead to the prescribed effects during the course of a journey. Where the applicant is not seen in person, a successful desk-based assessment relies heavily on the questions in the Blue Badge application form delivering the right level of information about the applicant, their disability, any medical conditions they experience and their ability to walk during the course of a journey.

4.121 When designing desk-based assessment tools, the DfT recommends that local authorities draw upon significant input from experienced healthcare professionals who are familiar with Blue Badge eligibility assessments and in particular, the 'subject to further assessment' criteria.

4.122 Many desk-based assessment approaches additionally incorporate the cross-checking of local authority records as a means of providing further detail about the likely nature of an applicant's disability. Please see the guidelines above in relation to cross-checking of records.

4.123 The 2012 independent review of Blue Badge scheme showed that, whilst desk-based assessments have a role as a filtering mechanism to identify applicants who are clearly eligible or clearly ineligible for a badge, they cannot be successfully used as the sole means of determining all applicants' eligibility for a badge.

Legislation requires that local authorities must obtain certification from an appropriate expert assessor (for example, by way of an impartial mobility assessment) if they are unable to make a clear and robust decision on eligibility using cross-checking or desk-based assessment, i.e. where eligibility is not self-evident.

Case study - desk based assessments

Bolton Council's contact centre officers use a quantitative scoring matrix to determine the eligibility of Blue Badge applicants against the 'subject to further assessment' criterion.

The scoring matrix was developed by experienced occupational therapists and relates to specific questions contained in the council's Blue Badge application form. Scoring thresholds are subsequently applied by the contact centre officers to enable them to reach a decision to refuse or award a badge, to undertake further assessment action such as telephoning the applicant for any information missing from the application form or contacting the applicant's GP for further factual information, or to refer the applicant for an impartial mobility assessment with an occupational therapist.

Bolton believes that adopting desk-based assessments has enabled them to make quicker eligibility decisions, reducing processing time from up to 8 weeks to within 10 working days.

A set of 'core principles' for designing and implementing desk-based Blue Badge eligibility assessments were developed through the 2012 independent review of the scheme. This is available for reference at [Appendix F \(https://www.gov.uk/government/publications/the-blue-badge-scheme-local-authority-guidance-england\)](https://www.gov.uk/government/publications/the-blue-badge-scheme-local-authority-guidance-england).

Case Study - Mobility assessments

Stoke-on-Trent has arranged for occupational health nurses employed by the NHS to conduct mobility assessments with all 'subject to further assessment' applicants in three different district health centres. Each assessment involves the assessor observing the applicant moving into the assessment room, talking with them about their condition and medication, asking how it affects their walking ability and watching the applicant leave the health centre.

Although the applicant is being seen in-person, a successful mobility assessment often also relies upon information provided in response to the questions included in the local authority's application form. A set of 'core principles' for designing and implementing mobility assessments was also developed as described in [Appendix G \(https://www.gov.uk/government/publications/the-blue-badge-scheme-local-authority-guidance-england\)](https://www.gov.uk/government/publications/the-blue-badge-scheme-local-authority-guidance-england).

Mobility assessment approaches to date in rural locations

4.124 During focus group discussions conducted as part of the 2012 independent Blue Badge scheme review, badge holders stated that they were generally prepared to travel for up to 20 minutes to be assessed for a Blue Badge. This may be of use to local authorities when identifying locations for Blue Badge assessment venues.

Case Study - Mobility assessment approaches in rural locations

Shropshire Council is one of the most rural and sparsely populated counties and received 5,000 plus Blue Badge applications in 2017. A back-office Blue Badge team is supported by front line staff based at a total of 6 face to face customer service points and libraries around the county.

The back-office team coordinates badge mobility assessments with all 'subject to further assessment' applicants. They first cross-check adult social care records before using a desk-based review to identify applicants whose mobility clearly meets or does not meet the walking criterion. The remainder are referred for a mobility assessment which is delivered at eight venues across the county, including 5 hospitals, 2 medical centres and a community centre.

In 2017, approximately 1,250 Blue Badge mobility assessments were carried out by physiotherapists. Each assessment takes approximately 30 minutes to complete.

The mobility assessment explores several aspects including:

- breathlessness
- turning without the risk of falling
- the speed at which the applicant can comfortably walk over a given distance, perceptions of exertion over that walking distance, perceptions of pain over that walking distance and details of any walking aids needed/used by the applicant

As part of the assessment, the assessor will also look at a person's general mobility and can make additional recommendations such as on the issue and correct use of walking aids, further referrals to falls clinics or other medical professionals, and provide advice on gait.

A Protocol Agreement between Shropshire Council and Shropshire NHS underpins these assessments.

Joint mobility assessments

4.125 It may also be possible for joint assessments, focused on other aspects of health and social care benefits, to consider the non-visible ('hidden') disabilities that people experience in the context of their eligibility relative to the Blue Badge scheme's 'subject to further assessment' criteria.

4.126 In such cases, where it is not self-evident by the information provided to a local authority that an applicant will/will not meet the 'subject to further assessment' eligibility criteria, then the individual should be expected to present for an in-person mobility assessment, carried out by an 'expert assessor', unless they also experience any non-visible ('hidden') disabilities which could make answering questions or completing an in-person mobility assessment overwhelmingly stressful or intimidating.

4.127 A number of local authorities have integrated their Blue Badge mobility assessment procedures (for people with impairments that are predominantly physical in nature) with other related concessions and benefits, such as concessionary travel and adult social care. In doing so they have been able to achieve cost savings whilst also improving customer service for applicants by reducing the number of assessments that they need to undergo.

4.128 Some authorities have successfully integrated the application and assessment procedures for various travel related concessions. These typically include Blue Badges, concessionary travel passes, Dial-a-Ride, community transport and taxi cards.

4.129 Some local authorities have joined up their Blue Badge eligibility assessment procedures with those used to determine the award of social care packages, equipment, and adaptations. This is often achieved through the inclusion of a small number of additional questions which relate specifically to the 'subject to further assessment' Blue Badge criteria into in-home social care assessments. These questions are typically focused on determining physical aspects of an individual's walking ability, and the extent it affects their ability to travel outside of the home

4.130 The 2012 Blue Badge scheme independent review identified the following considerations for local authorities when developing joint assessment approaches:

- integrating teams within the local authority to administer all the concessions to be jointly assessed or establishing strong links between existing teams which manage each of the respective concessions
- developing common fields across application forms for each of the concessions so that information gathered about applicants in respect of different concessions can be fed into the joint assessment process
- establishing a joint mobility assessment proforma with due consideration of the eligibility criteria for each concession
- training mobility assessors to fully understand the criteria of different concessions included within the joint assessment process
- ensuring that feedback mechanisms exist within the local authority so that an assessor's recommendations are available to administrative staff members in the relevant teams or departments

4.131 This independent review also found strong support for joint assessments among the majority of disabled people and the Disabled Persons Transport Advisory Committee.

Determining the eligibility of organisational applicants

Organisational eligibility criteria

5.1 An organisational badge may be issued to an organisation for use in a motor vehicle or vehicles when the vehicle or vehicles are to be used to carry disabled people who would themselves be eligible for a badge as specified in Section 4(2) of the Disabled Persons (Badges for Motor Vehicles) (England) Regulations 2000. [\[footnote 17\]](#)

5.2 An 'organisation' is defined in the 2000 Regulations as meaning an organisation concerned with the care of disabled persons to which a disabled person's badge may be issued in accordance with section 21(4) of the Chronically Sick and Disabled Persons Act 1970 [\[footnote 18\]](#).

5.3 Local authorities will need to check whether the organisation in question:

- cares for and transports disabled people who would themselves meet one or more of the eligibility criteria for an individual Blue Badge
- has a clear need for an organisational badge rather than using the individual Blue Badges of people it is transporting

5.4 It is unlikely that taxi or private hire operators and community transport operators would be eligible for an organisational Blue Badge as they are not usually concerned with the care of disabled people who would meet one or more of the eligibility criteria for a badge. Such operators are, of course, still able to use an individual's Blue Badge when carrying that person as a passenger.

Assessing organisational badge applications

5.5 Applications for badges from organisations caring for disabled people should be examined to ensure that they are genuine and necessary. It is for

local authorities to make this judgement, based on their local knowledge of the organisation concerned. Common examples of organisations that may be eligible include residential care homes, hospices or local authority social services departments that transport groups of people who would meet the eligibility criteria for an individual Blue Badge.

5.6 When making an application, organisations could be asked to provide the same type of information required by the Driver and Vehicle Licensing Agency (DVLA) for licensing a vehicle under the Disabled Passenger Vehicle (DPV) taxation class (for exemption from Vehicle Excise Duty (VED)). To licence a vehicle in the DVP taxation class, an organisation needs to make a signed declaration on the organisation's letter-headed paper.

The declaration for a badge application needs to say that they are an organisation concerned with the care of disabled people (who would meet one or more of the eligibility criteria prescribed in the regulations that govern the Blue Badge scheme) and that they will be using the vehicle solely for the purpose of transporting those people.

This should be signed by a board member or Trustee of the organisation. The model application form and the online application facility available on GOV.UK both have specific declarations for organisational applicants.

5.7 In order to help determine eligibility of applications, local authorities could ask the applicant organisations:

- about the number of qualifying disabled people being cared for
- about the type of vehicle(s) being used to carry them, whether it is adapted and how
- why the organisation feels they need an organisational badge rather than using individual Blue Badges of people in their care
- how often the badge is likely to be used and for what purpose

5.8 Although there is nothing in the regulations governing the scheme about the actual numbers to be 'cared for' in order to qualify for a badge, where relatively few people meet the eligibility criteria for a badge in the organisation, it would be preferable for the disabled people themselves to apply for badges, rather than have one issued to an organisation. This then allows the holder to use the badge issued to them in any vehicle in which they are travelling, as either a driver or passenger.

5.9 In all circumstances, badges must be issued to the organisation and not to individual employees. However, like other successful applicants, organisations issued with a Blue Badge should be sent a copy of DfT's leaflet 'The Blue Badge Scheme: rights and responsibilities'.

All employees of the organisation who will be using the badge should also be reminded that they must only use the badge for the purposes of transporting disabled people who meet one or more of the eligibility criteria for a badge.

These employees should be reminded that if they use the badge to take advantage of the concessions when there are no passengers in the vehicle who are themselves eligible for a badge they could face a fine of up to £1,000.

Case study - organisational badges

Liverpool City Council has improved its procedure for assessing organisational badge eligibility in response to concerns over misuse. Blue Badge team managers now personally visit applicant organisations to check and discuss the organisation's remit, its need for an organisational badge, the vehicles it uses and to check the vehicle documents.

Administering the scheme after the assessment

Unsuccessful applications

Grounds for refusal to issue a Blue Badge

6.1 Under regulation 8 of the 2000 Regulations (SI 2000/No 682) [\[footnote 19\]](#) (as amended by (SI 2011/2675 [\[footnote 20\]](#))), a local authority may refuse to issue a Blue Badge if:

- the applicant holds or has held a badge and misuse has led to a conviction for an offence defined in regulations 2(3) and 2(4)
- the applicant fails to provide the local authority with adequate evidence of their eligibility, either as an individual or as an eligible organisation
- the applicant fails to pay the fee chargeable for the issue of a badge (if a fee is required by the issuing authority)
- the local authority (i) has reasonable grounds for believing that the applicant is not the person they are claiming to be, or (ii) would permit another person to whom the badge was not issued to use the badge

- the applicant fails to provide evidence of residency
- the applicant already holds a valid badge issued by another issuing authority
- a report from an expert assessor confirming an applicant's eligibility has not been made available to that local authority in a form that is satisfactory to them

6.2 With reference to (a) above, a 'relevant conviction' is defined in regulation 2(3) and 2(4) of the 2000 Regulations (as amended). Essentially, this covers convictions of a badge holder or third party of offences under section 21(4B) of the Chronically Sick and Disabled Persons Act 1970 [\[footnote 21\]](#) and sections 115 and 117 of the Road Traffic Regulation Act 1984 [\[footnote 22\]](#). The relevant offences are intended to address misuse of a real badge by a third party or use of a fake/altered badge by a badge holder or third party. In addition, relevant offences include dishonesty or deception committed under any UK legislation in relation to the badge. More information on convictions and the wrongful use of a Blue Badge is provided in enforcing the scheme.

6.3 With reference to (b) above, this includes any decision to refuse a Blue Badge to an individual who is deemed not to meet one or more of the eligibility criteria for receiving a badge. This could be because the applicant failed to provide the relevant supporting evidence of eligibility with their application, for example failed to provide proof of receipt of HRMCDLA, WPMS or the appropriate PIP score.

6.4 With reference to (d) above, decisions to refuse to issue a badge on the grounds that the applicant is not the person they claim to be, or that they would permit another person to use a badge that has been issued to them should not be taken lightly. In all cases the final decision should be taken after careful examination of the facts.

6.5 No time limit is set out within the 2000 Regulations on the period for which a local authority can refuse to issue a Blue Badge to an applicant under points (a) to (g) above.

6.6 An applicant should not be refused a badge solely on the grounds that they have not been awarded (or no longer receive) the Higher Rate of the Mobility Component of Disability Living Allowance or the appropriate PIP score. In such cases, the applicant should be assessed under the 'eligible subject to further assessment' criteria. In addition, applicants should not be advised that they need to apply for DLA or PIP in order to determine badge eligibility.

Case Study - Refusals

6.7 Some local authorities have established procedures to deter applicants from repeatedly applying for a Blue Badge. These procedures are applied when it is clear that an applicant does not meet the eligibility criteria for receiving a badge, when their original application has been refused, and when this decision has been upheld following a review of their application ‘on appeal’:

- Stoke-on-Trent City Council informs applicants that they can reapply for a Blue Badge in 3 months, if they believe their condition has changed, or they can provide further evidence of their eligibility for a Blue Badge
- the London Borough of Bromley informs applicants that they cannot reapply for a Blue Badge for a period of 6 months if their application has been refused because they do not meet the Blue Badge eligibility criteria

6.8 In both cases, individuals whose condition deteriorates significantly within these timeframes are not prevented from reapplying for a badge.

Feedback for unsuccessful applicants

6.9 Regulation 8(3) of the 2000 Regulations states that where a local authority receives an application for a badge and refuses to issue one, it must let the applicant know in writing why their application was refused. The DfT strongly recommends that every applicant who is refused a badge should be given a detailed explanation of the grounds for refusal.

6.10 It is not sufficient to simply state that the applicant did not meet the eligibility criteria. The Local Government Ombudsman [\[footnote 23\]](#) expects authorities to provide a clear explanation of the reasons why an application has been refused in the decision letter. This transparency can avoid complaints being made and upheld. By providing detailed feedback for unsuccessful Blue Badge applicants, local authorities can proactively reduce the number of ‘appeals’ they receive.

6.11 Some local authorities have a higher refusal rate through strict application of the Blue Badge eligibility criteria in their local area. All of these authorities determined the eligibility of ‘subject to further assessment’ applicants through a combination of cross- checking, desk-based and mobility assessments.

Despite high rates of refusal, these authorities demonstrated a rate of appeal that was similar to the average (2.5% of all subject to further assessment applicants). Further investigation of how this had been achieved revealed that:

- applicants are generally less likely to appeal because they feel the authority has given their application due consideration

- detailed feedback letters explain to unsuccessful applicants why they had fallen short of the eligibility criteria, thereby making the decision-making process more transparent

Case study - detailed feedback

The Royal Borough of Kensington & Chelsea provides unsuccessful Blue Badge applicants with the following information:

- a description of the relevant criterion against which the applicant was not adjudged to have been eligible, referring to the fact that the eligibility criteria are set nationally by the DfT
- specific reference to information provided by the applicant in their application form, and where relevant during a mobility assessment with an expert assessor, that shows why they do not meet eligibility criteria for receiving a Blue Badge
- references to relevant pages on the GOV.UK and DfT websites where applicants can read further information about the Blue Badge eligibility criteria
- an explanation of the local authority's procedure for dissatisfied applicants to appeal (including asking for their case to be reviewed by a senior member of staff), or to complain about the way that staff members at the local authority have handled their case

This includes a statement that unless the applicant can provide further evidence in support of their application, or their mobility has significantly changed since they applied for the Blue Badge, then their appeal against the decision is unlikely to be successful.

Local authority appeals procedure

6.12 There is no legal requirement for local authorities to have an appeals procedure in place if someone disagrees with the reason why their application for a Blue Badge was not successful. However, as explained above, Regulation 8(3) of the 2000 Regulations states that, where a local authority receives an application for a badge and refuses to issue one, it must let the applicant know in writing why their application was refused.

6.13 Local authorities are, however, strongly recommended to establish an internal procedure to deal with appeals against an authority's decision not to issue a badge. This process needs to be clear, straightforward, and fair, and not in itself a deterrent to applying for a badge. In addition, it is important

that this appeal procedure is clearly signposted to unsuccessful applicants in their decision letter.

The Local Government Ombudsman considers that failure to put in place a proper appeal mechanism would be likely to result in an adverse finding in the event of a complaint being made to them.

6.14 There are two different ways in which applicants may wish to contact their local authority after receiving notification that their Blue Badge application has been refused:

- the unsuccessful applicant may believe that their application has been wrongly refused and wish to query that decision through a review of their application and the decision
- the unsuccessful applicant may be unhappy with the manner or conduct of local authority staff members who handled their enquiries and/or mobility assessment and wish to complain about these issues

Request for review of decision

6.15 The term ‘request for review of decision’ is used here because it is more appropriate than ‘appeal’, which usually implies both more formality and more independence from the local authority than is envisaged

6.16 Applicants who are refused a Blue Badge may believe that their application has been wrongly refused and wish to query that decision.

DfT recommends that in such situations there should be provision for the dissatisfied applicant’s case to be reviewed by the issuing authority, preferably by someone who was not directly involved in the initial decision. Local authorities should note that the DfT does not have the power to intervene in individual applications that have not been successful on the grounds that the applicant does not meet the eligibility criteria and that they should not advise such applicants to appeal to the DfT.

6.17 Focus groups with Blue Badge holders and the Disabled Persons Transport Advisory Committee (DPTAC) [\[footnote 24\]](#) revealed strong support for unsuccessful applicants to be offered an impartial assessment upon appeal if their original eligibility decision was reached without an impartial assessment.

Complaints

6.18 The term ‘complaint’ is used to deliberately distinguish this type of appeal from the request for a review of the decision. Some Blue Badge applicants may be aggrieved not by the eligibility decision of the authority but rather the way in which the process has been conducted. They may, for example, be upset by the manner or conduct of local authority staff or view aspects of the process as unfair.

6.19 In such cases these applicants should be made aware of the local authority’s standard complaints procedure, in the same way that any other user of the local authority’s services would be informed of their right to complain. Applicants should also be reminded that complaints can be brought to the attention of the Local Government and Social Care Ombudsman [\[footnote 25\]](#).

Their advice team can provide further advice to both local authorities and applicants on the role of the Local Government Ombudsman and can be contacted on 0300 061 0614 or via the LGO online complaint form.

Successful applications

6.20 Successful applicants will be given the DfT leaflet “The Blue Badge Scheme: rights and responsibilities” when they are provided with a Blue Badge. The Blue Badge Digital Service will supply a copy of the leaflet and the parking clock when the badge is sent. Local authorities are able to buy additional copies of the leaflet, the parking clock, and wallets from the APS Group. The rights and responsibilities leaflet, which includes advice for individuals and organisations is available to download free of charge from [Blue badge scheme: rights and responsibilities in England](https://www.gov.uk/government/publications/the-blue-badge-scheme-rights-and-%20responsibilities-in-england) (<https://www.gov.uk/government/publications/the-blue-badge-scheme-rights-and-%20responsibilities-in-england>)

6.21 Badge holders should also be reminded that they have a duty under Regulation 9 of the 2000 Regulations to return the badge if:

- the badge expires
- the badge holder is no longer eligible, or, in the case of an organisational badge, the organisation no longer exists or is no longer eligible
- it is a replacement badge for one that is lost or stolen, and the original is found/recovered (in this case the original badge should be returned so that it can be securely destroyed)
- the badge is so damaged/faded that the details on it are illegible or it cannot be identified correctly or distinguished from a forgery
- the badge is no longer required by the holder (for example, where they have become confined to the house); or another valid badge is inadvertently issued to the holder by another issuing authority

- the badge holder dies

However, it should be noted that under new regulations, if an existing recipient of HRMCDLA is reassessed by DWP and fails to score 8 points or more under the 'moving around' mobility component of PIP or 10 points specifically for descriptor E under the 'planning and following journeys' activity of the mobility component of PIP, legislation requires that they should be allowed to retain their current badge until it expires.

6.22 It should be noted that the badge remains the property of the issuing local authority which has powers to withdraw the badge in some circumstances.

6.23 It should also be noted that an individual should not be in receipt of more than one valid badge at any time. Section 21(2) [\[footnote 26\]](#) of the Chronically Sick and Disabled Persons Act 1970 states that "A badge may be issued to a disabled person ...resident in the area of the issuing authority...." To support this, regulation 8(2)(f) of the Disabled Persons (Badges for Motor Vehicles) (England) Regulations 2000 says that a local authority may refuse to issue a badge on the grounds that "the applicant already holds a valid badge issued under section 21 of the 1970 Act or a recognised badge within the meaning of section 21A of that Act".

6.24 Where a second badge may have already been issued, regulation 9(1) (g) states that a badge shall be returned to the issuing authority immediately when "the holder is issued with another valid badge under section 21 [\[footnote 27\]](#) of the 1970 Act or with a recognised badge within the meaning of section 21A of that Act".

Issuing the Blue Badge and parking clock

6.25 Since 1 January 2012, the designs for both individual and organisational badges use sophisticated secure print technologies to ensure badges cannot be copied or forged, and details cannot be altered. The badge design also includes raised text features, a hologram and has to be tested to withstand up to 120 degrees centigrade.

6.26 Misuse of badges by someone other than the badge holder is currently a common occurrence. The written information contained on the badge has been changed to clarify the correct use of a badge. An up-to-date, passport-style photograph of the badge holder must be submitted and digitally scanned on the back of an individual badge to ensure the badge holder can be identified if necessary.

The only exception to this requirement for display of a photograph on the badge is when the issuing local authority is satisfied that the holder is not

expected to live beyond six months from the date of issue. The standards for photographs are the same as those used for passports and driving licences.

6.27 The parking clock is designed to be displayed with the Blue Badge when parking on yellow lines or in parking bays which are time-limited and should be set to show the time of arrival by badge holders. A parking clock will be issued to new badge holders at the same time as their Blue Badge. An additional design which includes the badge and the clock within a wallet is also now available.

In-person collection of Blue Badges

6.28 Wherever practicable, local authorities should consider requiring individuals or their representatives to collect their Blue Badge in person and to provide proof of identification on collection. In addition, if they are collecting a badge after a re- application, they should return their expired badge to the local authority at the same time so that it can be officially destroyed.

Local authorities may also wish to be aware that the Local Government Ombudsman expects them to ensure that there is sufficient flexibility in their procedures to deal with the minority of cases where the personal circumstances of the applicant involved mean that in-person collection is not possible.

6.29 In-person collection of the Blue Badge offers considerable anti-fraud benefits over the more common practice of posting a badge out to successful applicants. Benefits include:

- greater certainty that the person who underwent a mobility assessment is the same person who collects the badge at the end of the application process
- confirmation that the badge has been received by the successful applicant or a representative acting on their behalf
- the creation of an additional opportunity for the issuing authority to obtain declarations from the successful applicant that state the badge has been received and that it will only be used in accordance with the terms and conditions set out in the booklet 'The Blue Badge Scheme: rights and responsibilities'.
- an opportunity to proactively retrieve an expiring badge in order to remove this opportunity for abuse of the scheme

Case Study - In-person collection

The London Borough of Richmond does not send any Blue Badges through the post to successful new or reapplying applicants. All applicants, or their nominated representatives, are required to collect the badge from the council's Accessible Transport Unit in person.

If the badge holder attends to collect their own badge, then their likeness is checked against the photographs they submitted with their Blue Badge application before the badge is handed over. If a representative collects the badge on behalf of the badge holder then they must have a letter signed by the badge holder stating who will be collecting the badge. They will also be asked to provide proof of their ID.

All reapplying applicants are required to hand over an existing badge which is in their possession before they are given the new badge.

In all cases, the badge holder or their representative is reminded of their responsibilities under the Blue Badge scheme and their attention is drawn to the Blue Badge scheme: rights and responsibilities booklet, as well as the declarations the applicant is required to have ticked and signed (in the application form) prior to receiving a Blue Badge.

Where any abuse or misuse of an applicant's Blue Badge subsequently takes place, these signed declarations, and any misrepresentations made in the collection of the Blue Badge, can be used by the local authority as part of their evidence for a local magistrate.

Period of issue

6.30 In accordance with the regulations that govern the scheme most badges must be issued for three years. However, certain exceptions apply, which are explained below:

- in the case of children under three, the badge should be issued for a maximum period ending on the day immediately following their third birthday
- where entitlement for a Blue Badge is linked to an award of the higher rate of the mobility component of Disability Living Allowance (HRMCDLA), War Pensioner's Mobility Supplement (WPMS) or Personal Independence Payment (PIP) the period of issue should be linked to the period of receipt of that allowance, where that period is less than three years

In this specific context there is no minimum period of issue for a Blue Badge. For example, a badge can be issued for 9 or 12 months if this corresponds with the period of issue of HRMCDLA, WPMS or PIP.

6.31 Where HRMCDLA, WPMS or PIP has been granted for a period longer than three years, the badge should only be issued for the standard three year period. At the point of a re-application, a badge should continue to be issued on a three yearly cycle provided that the applicant remains eligible (see “Re-applications” below).

6.32 In no circumstances should a badge be issued under the ‘subject to further assessment’, which states that a person needs to have an ‘enduring and substantial disability’, to applicants with a temporary disability or for a period of less than 3 years.

Data storage and sharing

6.33 Local authorities have a statutory obligation under Section 21(5) of the Chronically Sick and Disabled Persons Act 1970 to maintain a register showing:

- the holders of badges issued by the authority
- the vehicle or vehicles for which each of the badges is held

6.34 A robust system that can identify badge holders within a local authority is invaluable not only to issuing authorities, but also to police and enforcement authorities in dealing with instances of misuse, stolen or fraudulent badges. The Blue Badge Digital Service will enable data sharing and enforcement checks quickly and easily. Re-applications for individual Blue Badges

6.35 Issuing badges for a maximum three year period allows local authorities allows the make several important checks:

- authorities can confirm that individuals who were awarded a badge under the ‘without further assessment’ criterion remain in receipt of qualifying benefits. If they no longer receive these benefits, then it may be necessary for the applicant to be assessed against the ‘subject to further assessment’ criteria to determine whether the applicant remains eligible to receive a Blue Badge - from October 2013
- if someone aged 16-64 applies for a badge on the basis of a HRMCDLA award, it is advisable to check with DWP that the award is still valid as the individual may have been reassessed for PIP and had the HRMCDLA award terminated

- check that applicants who were awarded the badge under the 'subject to further assessment' criteria continue to meet the eligibility criteria and are therefore in need of a badge. Although a badge holder may still have the same disability, it is possible that their degree of mobility may have improved to such an extent that they no longer meet the eligibility criteria
- where a badge holder has a permanent disability, which will not change (for example, where there has been a loss of limbs), the opportunity to reapply for the badge allows the local authority to ensure that the applicant's personal details, such as their address, remain correct, that the information on the badge remains legible and that an up-to-date photograph is obtained

6.36 It is entirely a matter for local authorities to assess an applicant's eligibility for a badge at the point of a re-application in accordance with the regulations governing the scheme. The administrative measures taken in assessing reapplying applicants are for individual authorities to decide.

If local authorities use a well-designed application form and a screening assessment that has been designed with input from expert assessors with experience of conducting Blue Badge assessments, they are able to 'filter out' those new applicants who are 'self-evidently' eligible or ineligible without the need for an expert assessor to see them in person.

The work also indicates that a robust independent mobility assessment at the point of initial application can highlight those successful applicants with conditions and mobility impairments that are unlikely to change and who would not require a further in-person independent mobility assessment at the point of a re-application.

6.37 Local authorities should generally do their best to ensure that re-applications are dealt with as quickly and efficiently as possible. However, if a reapplying applicant was previously issued a badge by another local authority, it is the responsibility of the new issuing authority to ensure that the applicant still meets the eligibility criteria for a badge.

6.38 [Appendix I \(https://www.gov.uk/government/publications/the-blue-badge-scheme-local-authority-guidance-england\)](https://www.gov.uk/government/publications/the-blue-badge-scheme-local-authority-guidance-england) draws on the findings from the independent review to identify a set of 'core principles' that local authorities may wish to consider when developing robust procedures for handling re-applications for a Blue Badge.

Replacement of damaged/lost and stolen badges

6.39 Where a badge has been lost, stolen, or destroyed, or has become so damaged or faded that it is illegible or cannot be identified correctly or

distinguished from a forgery, the local authority can issue a replacement badge.

6.40 The expiry date shown on the replacement badge should be the same as the date that appeared on the original badge. The record of the original badge should be updated on the Blue Badge Digital Service to show that it is no longer valid. This information should be passed to on-street enforcement teams where possible. Replacement badges will now have a unique issue number included in the badge security number, instead of having the words “duplicate” on the front.

6.41 In the case of stolen badges, the authority should ask badge holders to provide a police crime reference number, for their records. If the badge is subsequently found or recovered, the original badge should be returned to the issuing authority so that it can be destroyed.

Case study

Through the Blue Badge Centre of Excellence Programme, Rotherham Metropolitan Borough Council worked with the neighbouring authorities in South Yorkshire to adopt a standardised approach to issuing duplicate badges. Previously the councils had no means of tracking the number of lost and stolen badges, and it was perceived as being easy for a badge holder to report a badge as lost and obtain a duplicate.

The local authorities in the area have agreed to implement several measures, including:

- require an applicant to provide a crime reference number if they report a badge as stolen
- ask the applicant to complete a specific form, which includes an anti-fraud declaration that states they do not know the whereabouts of the original badge and will return it to the council if it is found
- record the serial number of the lost or stolen badge and pass this on to other councils in the area so that any misuse can be readily identified by parking enforcement officers working in the region

6.42 Damaged badges should also be returned to the issuing authority to be officially destroyed. Wherever possible, the DfT strongly recommends that this process involves the badge holder collecting the replacement badge from local authority offices, or a nearby contact centre, so that it can be exchanged for the damaged badge.

6.43 Each time a replacement badge is issued, the date of reissue and reason should be noted on the badge holder’s record so that repeated

cases can be monitored, and action can be taken if abuse is suspected.

Deaths

6.44 When a Blue Badge holder dies, the badge should be immediately returned to the issuing authority (regulation 9(1) of the 2000 Regulations).

6.45 The DfT recommends that local authorities include details of how to return Blue Badges in their death registry packs, and cross reference deaths registered in their area against their Blue Badge holder records, so that recall notices can be issued as required.

The benefits of requesting the return of Blue Badges from the families of deceased badge holders through the death registration process were identified through the independent review and include:

- avoiding unnecessary distress for the family members of the deceased badge holder, for whom subsequent contact (for example, reapplying reminders) from the authority can be upsetting
- minimising the opportunity for fraudulent use and misuse of unreturned Blue Badges after the genuine holder is deceased
- minimising the amount of time local authority officers need to spend contacting the deceased badge holder's relatives
- reducing the number of invalid badges in circulation in a local area, thereby improving the scheme for all genuine badge holders and reducing the effort needed to enforce the Blue Badge scheme

Case study

Brighton & Hove City Council receives information on deaths in the area every week. The council's Blue Badge team check this list against their records of badge holders and cancel the blue badge. If the badge has not been returned approximately 6 weeks after information about the death has been received, the Blue Badge team send a sensitive letter to the badge holder's last address, requesting that the badge be returned.

As soon as the information about the death of a Blue Badge holder has been received a note is added on the individual's electronic record in order that they are not inadvertently sent a renewal reminder. The information is also added to the civil enforcement officers handheld computers so that they can report any such badges that are being used through the issuing of a Penalty Charge Notice.

In addition to all of the above, in an effort to make sure badges are returned as soon as possible after a Blue Badge holder has passed away, they include information about the importance of returning a badge in their death registry packs.

Kent County Council a request for bereaved family members to return Blue Badges belonging to deceased relatives is included in death registry packs. Kent County Council operates a 'Tell Us Once' scheme which comprises a face-to-face or telephone interview covering all aspects of death registry, including a request to return a Blue Badge.

6.46 On the GOV.UK website the Blue Badge is included in a list of items about which a deceased individual's family may need to contact their local authority as part of the process of registering the death:

6.47 Local authorities participating in the National Fraud Initiative [\[footnote 28\]](#) which is a Cabinet Office run service that matches electronic data within and between public and private sector bodies to prevent and detect fraud can also now opt to submit their Blue Badge holder records for comparison against the Department for Work and Pension's database of deceased persons as part of this exercise. This may be particularly relevant for local authorities operating in metropolitan areas with a more transient population. For further information please contact:

- e-mail: nfquiries@cabinetoffice.gov.uk
- telephone: 0845 345 8019
- National Fraud Initiative [contacts page \(https://www.nfi.gov.uk/Contact\)](https://www.nfi.gov.uk/Contact)

Enforcing the scheme

Who should read this

7.1 This guidance is aimed at any local authority officer involved with Blue Badges - whether from the issuing or enforcing perspective.

7.2 The demand for Badges has increased significantly – trebling in the last 20 years - and we estimate there could be 650,000 additional Badge holders over the next 10 years.

7.3 Although the scheme began as a way of improving access for disabled people, the substantial monetary value of a Badge in some areas is contributing to both increasing demand and the incentive to abuse the

scheme and commit fraud. The misuse of Blue Badges undermines the benefits of the scheme, impacts upon local traffic management, and creates hostility amongst other badge holders and members of the public.

7.4 Abuse can occur at all points in the system, whether at the point of the initial application, through requests for replacements, to on-street usage. For this reason, it is vital that both issuing teams and parking enforcement teams are alert to criminal or fraudulent behaviour and attempt to prevent fraud and abuse before it happens.

7.5 Robust, ongoing administration and enforcement processes can help counter more systematic abuse of the Blue Badge scheme, with both issuing authorities and on-street parking enforcement teams having a role to play in ensuring that the scheme's rules are obeyed.

What is this section about

7.6 This section of the guidance seeks to highlight some of the many forms of abuse that are prevalent and seeks to illustrate some of the actions local authorities could take to combat it, often based on the real experiences of local authorities. It also details the existing powers available to local authorities.

7.7 It is not meant to be prescriptive – it is important that local authorities have the freedom and ability to develop an enforcement strategy suitable for their own particular circumstances. This guidance will assist local authorities in enforcing the Blue Badge scheme.

Types of abuse/misuse

7.8 Badges can be abused in a multitude of ways and it is important that local authorities remain vigilant at all stages of the issuing/enforcing process. The following is not an exhaustive list, but illustrates several ways in which badges can be misused, from minor to more serious transgressions.

By the badge holder:

- parking in the wrong place or parking for too long where there is a time limit (for example, setting the arrival time on the parking clock to a later time, than when they actually arrived)
- use of a badge that is no longer valid

- use of a badge that has been reported as 'lost' or 'stolen'
- letting a friend or relative use the badge
- use of a copied badge
- altering the details on the badge, for example, the expiry date
- making a fraudulent application (for example, providing false information on the application form) or using a badge obtained fraudulently

By a third party:

- using someone else's badge (with or without the badge holder's knowledge) without the badge holder being present in the vehicle at some point during the trip
- using a badge belonging to someone who has died
- copying, altering, or faking badges
- using a fake badge

Enforcing the scheme

7.9 Local authorities should consider developing a range of tools and techniques to deal with different types of offenders and different types of offences. Conventional enforcement complemented by additional preventative measures is more likely to be successful in the long term.

Issuing authorities

7.10 Local authorities should consider ways of preventing abuse and misuse at the outset. Ensuring that only eligible people get badges and that expert assessors are used where eligibility is unclear, is the first step.

7.11 As part of this process, local authorities should make checks on the applicant's identity and address to confirm that they are who they say they are and that they are resident in the local authority area.

Seeking a signed declaration of these facts from the applicant will also support subsequent enforcement action by local authorities where it is later found that the applicant has supplied false information. Obtaining a declaration that the badge holder will not allow someone else to use a badge that has been issued to them may stop badge holders from doing so, by removing the excuse of ignorance.

7.12 Once a badge is to be issued, the local authority may wish to consider the most secure way of distributing badges. Where badges are subsequently reported as stolen by badge holders, some authorities will request the badge holder provides a crime investigation number (issued by the police), before a replacement is issued. A badge holder is less likely to falsely claim a badge has been stolen if they are required to formally report this to the police.

7.13 Ensuring all successful applicants are properly informed of - and understand - what they can and cannot do with a badge (and when/how it should be returned to the issuing authority) is likely to reduce the chances of accidental misuse occurring and avoid disputes. The badge holder is supplied with a copy of the DfT's guidance leaflet 'The Blue Badge scheme: rights and responsibilities in England'. Local authorities may wish to consider producing further, free information leaflets, informing local badge holders of where they can park in the local authority and conditions of use at each site, to help badge holders to use the badge correctly.

7.14 Those who abuse the Blue Badge scheme may find it easy to convince themselves that no one really suffers as a consequence of the abuse, or that it is acceptable because 'everyone does it'. Publicising the consequences for disabled people who are unable to park close to where they need to get and publicising the potential consequences for offenders of misusing badges, could reduce the number of offences.

7.15 Some authorities enable the general public to report abuse. Where the public report abuse, we would encourage local authorities to follow up the matter and to act as appropriate in order to deter or prevent repeat offending.

We would also encourage issuing authorities to work closely with their enforcement authorities and act on information supplied by enforcement officers.

Offenders can be prosecuted and face a fine of up to £1,000 on conviction or could face a significantly higher penalty if the prosecution is carried out under the Fraud Act 2006 [\[footnote 29\]](#). Badges can also be withdrawn (as set out in section 7.20 below) after a relevant conviction.

The DfT is aware of authorities who work closely with magistrates to inform them about the seriousness of the issues and to encourage more consistent and effective penalties.

7.16 Working together with other local authorities and DfT and ensuring issuing and enforcing authorities work together effectively can help to maximise resources, share skills and intelligence, spread any costs, and ensure that the abuse is not simply moved to the neighbouring local authority area.

Enforcing authorities

7.17 There is a wide range of legislation available to local authorities to use in their enforcement activities. Local authorities can be flexible in how they use these powers to address their own local circumstances and the specifics of each case. The following examples have been put together after talking to local authorities about how they are attempting to address badge abuse.

7.18 Local authorities may be aware that on 8 October 2013 the Disabled Persons' Parking Badges Act 2013 and the Disabled Persons (Badges for Motor Vehicles) (England) (Amendment) Regulations 2013 came into force (see "Inspecting badges" section below for further information).

7.19 In cases where an applicant makes a fraudulent application (providing false information), it may be possible to prosecute the individual under section 2 of the Fraud Act 2006. This carries a penalty of a fine of up to £5,000 and/or up to 12 months imprisonment on summary conviction.

If a badge has been issued, the local authority can require its return under Regulation 9(2)(b) of the Disabled Persons (Badges for Motor Vehicles) (England) Regulations 2000. [\[footnote 30\]](#)

7.20 The following are actions that could be taken against a badge holder who uses an expired badge, an illegible badge, a badge that was lost or stolen and for which a replacement has been issued, or a badge which they are no longer entitled to use:

- they could be prosecuted and receive a fine of up to £1,000 on conviction under section 117 of the Road Traffic Regulation Act 1984
- they could be issued with a Penalty Charge Notice for the parking contravention in those areas where local authorities have taken civil parking enforcement powers. In other areas, Fixed Penalty Notices can be issued
- the local authority could seize the badge under section 21 (4D) of the Chronically Sick and Disabled Persons Act 1970
- regulation 9 of the Disabled Persons (Badges for Motor Vehicles) (England) Regulations 2000 allows the badge to be withdrawn after a relevant conviction
- in serious cases of misuse, section 2 of the Fraud Act 2006 "fraud by false representation" [\[footnote 31\]](#) may be applicable

7.21 Where a badge holder simply parks in the wrong place or parks for too long with a valid badge, a Penalty Charge may be issued for any parking contravention.

In cases where a badge holder lets a third party use a badge, the issuing local authority can withdraw the badge under regulation 9(2)(a) of the

Disabled Persons (Badges for Motor Vehicles) (England) Regulations 2000 [\[footnote 32\]](#) , but only after a relevant conviction has been obtained (a Penalty Charge may also be issued for any parking contravention that has occurred during the badge misuse). In such circumstances, a relevant conviction requires that the non-badge holder is using the badge with the holder's knowledge.

This is often very difficult for local authorities to prove, even when they know it is happening. It should be remembered, however, that whilst this may make it difficult to withdraw a badge that is being systematically abused by a friend or family member, a local authority may refuse to reissue a badge if it has reasonable grounds for believing that the applicant would permit another person to use it (Regulation 8(2)(d)(ii)) [\[footnote 33\]](#) .

7.22 The following are some of the actions that could be taken against a person using someone else's badge for their own benefit: * they could be prosecuted and receive a fine of up to £1,000 on conviction under section 117 of the Road Traffic Regulation Act 1984 [\[footnote 34\]](#) * consideration could be given to prosecuting persistent offenders under the Fraud Act 2006 [\[footnote 35\]](#) * they could be issued with a Penalty Charge Notice for any parking contravention * the local authority could seize the badge under section 21 (4D) of the Chronically Sick and Disabled Persons Act 1970 [\[footnote 36\]](#)

7.23 For offences that involve either the badge holder or anyone else copying, altering, or faking/forging a badge, the following legislation may be used, depending on the circumstances:

- offenders can be prosecuted under section 115 of the Road Traffic Regulation Act 1984 [\[footnote 37\]](#) and are liable on summary conviction to a fine of up to £5,000, and up to two years imprisonment on indictment
- the Fraud Act 2006 [\[footnote 38\]](#) and the Forgery and Counterfeiting Act 1981 [\[footnote 39\]](#) may be used. These carry heavier penalties
- an offender can be prosecuted under section 117 of the Road Traffic Regulation Act 1984 [\[footnote 41\]](#) and fined up to £1,000 if they are convicted of using a forged badge
- the offender could be issued with a Penalty Charge Notice for any parking contravention

7.24 In the case of other offences:

- the Theft Act 1968 (in particular sections 1 and 22) [\[footnote 41\]](#) may be used to prosecute someone found guilty of stealing badges, handling stolen badges, and/or using stolen badges
- when a stolen badge is being used but there is insufficient evidence to obtain a conviction under the Theft Act, section 329(1)(c) of the Proceeds of Crime Act 2002 [\[footnote 42\]](#) may offer another means of obtaining a conviction

- it is possible in certain circumstances for courts to disqualify persistent offenders from driving for a period of time under section 146 of the Powers of Criminal Courts (Sentencing) Act 2000 [\[footnote 43\]](#)
- there have been cases where people have attempted to sell badges through web-sites like E-bay or Gumtree

The badge remains the legal property of the issuing local authority, so it is unlawful for someone else to sell a badge. The rightful owner can act to recover the goods through the civil courts. It may also be possible to prosecute the person offering the badge for sale under section 7 [\[footnote 44\]](#) of the Fraud Act 2006.

Where a badge holder might attempt to sell (or gift) a badge, it will be possible to withdraw the badge, under regulation 9(2)(b) (as amended) [\[footnote 45\]](#), where the authority is satisfied that the holder “purported to transfer the badge to another person”, it is possible that Section 11 of the Fraud Act 2006 [\[footnote 46\]](#) (relating to obtaining services dishonestly) could be used when someone is seeking to fraudulently use a Blue Badge to gain parking concessions in an off-road parking area.

7.25 For the purposes of badge withdrawal, the requirement for a local authority to obtain 3 “relevant convictions” has now been reduced to one relevant conviction (regulation 9(2)(a) refers). Regulations 2(3) and 2(4) of the amended regulations define a relevant conviction. A badge can be withdrawn for one successful prosecution of a badge holder or third party of:

- an offence under section 21(4B) of the Chronically Sick and Disabled Persons Act 1970 [\[footnote 47\]](#) (this covers misuse of a real badge or use of a fake/altered badge while the vehicle is being driven)
- an offence under sections 115 or 117 of the Road Traffic Regulation Act 1984 (this covers misuse of a real badge or use of a fake/altered badge when the vehicle is parked)
- dishonesty or deception committed under any other UK legislation in relation to the badge (which takes account of offences under, for example, the Fraud Act 2006, the Theft Act 1968, the Forgery and Counterfeiting Act 1981, and so on)

7.26 Where the offence prosecuted was committed by a third party using the holder’s badge, the authority needs to demonstrate that the holder knew the third party was using the badge, before it can be withdrawn.

7.27 Inclusion of offences under section 21(4B) of the Chronically Sick and Disabled Persons Act 1970 [\[footnote 48\]](#) and sections 115 [\[footnote 49\]](#) and 117 [\[footnote 50\]](#) of the Road Traffic Regulation Act 1984 as relevant convictions, is intended to address misuse of a real badge by a third party or use of a fake/altered badge by a third party or badge holder. Although these offences also cover wrongful display of a badge by the holder, it is not intended that a

badge holder should be prosecuted and have the badge withdrawn for merely displaying it wrongly.

Inspecting badges

7.28 Under section 21(4BA) of the Chronically Sick and Disabled Persons Act 1970 [\[footnote 51\]](#) (“the 1970 Act”), an enforcement officer can approach a person in a vehicle displaying a Blue Badge (or a person who appears to have been in or to be about to get into, the vehicle) and require them to produce the badge for inspection. Typically, this would be done to check the detailed information and the photograph of the badge holder on the back of the badge, in order to verify whether the badge is being used by the correct person.

7.29 A person who without reasonable excuse fails to produce a badge when required to do so shall be guilty of an offence under section 21(4BD) of the 1970 Act and liable to a fine not exceeding £1000.

7.30 Until 8 October 2013, only the police could seize badges. Now, however, the Disabled Persons’ Parking Badges Act 2013 [\[footnote 52\]](#) (“the 2013 Act”) enables enforcement officers to inspect and retain a badge without police presence.

This would occur if they have reasonable grounds for believing that the badge:

- is a fake
- has already been cancelled for example, because it was reported lost or stolen
- should have been returned to the issuing authority (for example, because it has expired, the holder has died, the holder is no longer disabled, a replacement has been issued, the badge has become damaged/faded, the authority has written to the holder requesting return of the badge either following a relevant conviction for misuse or because it was obtained by false representation)
- is being misused (including by someone other than the holder when the genuine holder is not involved in the journey)

7.31 There is no obligation on local authorities to use this power, but many have indicated that they will do so. In using the power, we would expect enforcement officers to take appropriate steps to establish “reasonable grounds” for retaining the badge. Local authorities will wish to establish suitable procedures for their enforcement officers to follow but they could include checking the BBDS database; telephoning their local authority to

establish further details of the badge/badge holder; or interviewing the person using the badge at the roadside.

7.32 Of particular interest is the power to retain a badge that is being used (misused) by someone other than the genuine badge holder. In using this power, we would expect enforcement officers to establish that the disabled badge holder is not part of the journey. Even if they are not present, the badge holder may have been dropped at that place or may be being picked up from that place.

Very often the person using the badge will admit on questioning that the holder is not involved in the journey; some local authorities will telephone the holder using the details provided on the application form to establish their whereabouts, it is therefore important that if it is provided on a paper application, that the telephone number, is entered onto the Blue Badge system.

7.33 When a badge is retained in scenarios (a)-(c) above we expect the local authority will destroy it in due course, as it would no longer be valid (if the authority recovering the badge is not also the badge-issuing authority, we would suggest they liaise with the issuing authority in this respect). However, when a valid badge is retained under (d) above it should normally be returned to the holder. That is because the power to retain a badge is not the same thing as a power to permanently withdraw/confiscate a badge. Indeed, the badge holder may not know the third party is using the badge.

A badge can only be permanently withdrawn from use if a relevant conviction for misuse has been obtained under regulation 9(2) of the Disabled Persons (Badges for Motor Vehicles) (England) Regulations 2000 [\[footnote 53\]](#) or if the badge was obtained by false representation. To reinforce this, we are amending those regulations to explicitly require that a valid badge retained because it is being misused is returned as soon as reasonably practicable to the holder (provided that the authority does not have pre-existing grounds, under the regulations, for withdrawing the badge).

In practice this is likely to mean that the badge is returned first to the issuing authority by the enforcing authority and then to the holder. The issuing authority may wish to warn the holder about the seriousness of misuse when returning the badge. The act of returning the badge does not preclude the relevant authority from prosecuting any offence that has been committed, if desired.

7.34 The new legislation does not empower the local authority to use force when attempting to retain a badge. If an enforcement officer encounters any form of resistance we would advise that they take no further action without police support.

7.35 Local authorities should also note that the 2013 Act adds to the definition of enforcement officer a person who is employed by a local authority or with whom the authority have made arrangements for the purpose of inspecting and retaining badges. This could include a direct employee of the local authority or a contractor. Furthermore, this new category of “enforcement officer” does not need to be in uniform but they do need to be authorised in writing by the authority to carry out badge inspections and retentions.

They should also produce appropriate evidence of authority when exercising their powers, otherwise there is no obligation on an individual to hand their badge to the enforcement officer. In practice, the local authority should hold written documentary evidence of authorised officers and should ensure that all officers carry some form of identification authorising them to carry out inspections/badge retention.

The new powers therefore pave the way for the wider use of specialist Blue Badge fraud teams operating in plain-clothes, and without the requirement for police presence.

7.36 Each local authority will wish to consider its own training and procedures for enforcement officers employing the new powers. Whenever misuse or abuse of a badge is suspected, the parking enforcement officer should deal with the badge holder in a sensitive manner.

No assumptions or questions should be raised about why the individual has been issued with a badge, as this is not the enforcement officer’s role. In addition, some disabilities may not be immediately visible. In enforcing the Blue Badge scheme, we recommend that enforcement officers receive disability awareness training so that they can carry out their duties appropriately.

7.37 To aid the inspection process, a gender marker has been included in the unique serial number of the badge; “X” for male badges and a “Y” for female badges. The marker has been added to the badge to help enforcement officers to identify obvious cases of badge misuse.

When using this marker to check that the correct badge holder is using the badge, officers should be aware of, and deal sensitively with, individuals who may have undergone – or be undergoing - gender reassignment. These individuals will have been issued with a male or female badge according to whichever gender they are living under. Each badge number also now includes the badge holder’s month and year of birth and the expiry date.

7.38 The Blue Badge Digital Service and the new badge design will enable quicker and easier verification checks by enforcement officers. Enforcement officers are now able to use hand-held devices, provided they have a web browser, to check key details of the badge and the badge holder at the

roadside. They can also download a photograph of the holder. The Blue Badge Digital Service system administrator within the relevant issuing local authority is able to authorise enforcement officers' access to this part of the service.

Uncovering abuse and gaining evidence

7.39 The most commonly reported forms of abuse tend to relate to misuse of the Blue Badge by the friends and family of the badge holder. Where this is a problem and enforcing authorities wish to act, it is important that authorities are sure that misuse is taking place and have obtained sufficient evidence, especially if a prosecution is to be pursued. Local authorities may decide how to do this.

Some examples that have been used are:

- in cases of suspected systematic abuse, some local authorities have obtained authorisation to carry out undercover surveillance under the Regulation of Investigatory Powers Act 2000 (RIPA) [\[footnote 54\]](#) in order to build up evidence that can later be used to prosecute a person
- where an enforcement officer wishes to establish if the badge holder is in the vicinity of the vehicle and truly is part of the journey being made, some officers will phone the badge holder at home to establish this
- similarly, a local authority might choose to send an officer to the badge holder's home, simultaneously, whilst a colleague is with the third party who is using the badge
- some enforcement officers will stay on hand to observe both the start and end of a journey to establish if the badge holder is present at any stage
- a local enforcement team (often working in conjunction with the police) may identify Blue Badge abuse 'hot spots', such as streets around football stadiums, offices or shops
- some enforcement officers will question the badge user at the roadside at the time of inspecting the badge

Sharing information

7.40 It is important that there is effective communication between issuing authorities and on-street parking enforcement teams or other enforcement agencies. They need to be able to share the information they have on badge holders. However, local authorities are reminded that badge holders must have given their consent to sharing their personal information under

the Data Protection Act [\[footnote 55\]](#). This will probably have been done at the initial application stage in the 'Declaration' section of the Blue Badge application form (see [Appendix D](#) (<https://www.gov.uk/government/publications/the-blue-badge-scheme-local-authority-guidance-england>) for the model application form) or as part of a GOV.UK online application.

7.41 Where possible, issuing authorities should provide on-street enforcement teams with data on local badge holders, particularly in relation to badges that have been reported as lost or stolen so that these badges can be recognised if used on the street. This process can be made easier through the use of technology. For example, parking enforcement officers can use hand held devices to check the Blue Badge Digital Service system for key information about the status of individual badges. Alternatively, where this approach is not viable, parking enforcement officers could contact their local issuing authority to check the status of suspicious badges.

7.42 The Blue Badge Digital Service also enables checks on badges that have been issued anywhere in England, Scotland, or Wales. If they do not have such devices, local enforcement officers can ask for a check to be made on the Blue Badge Digital Service by their colleagues in either the issuing or enforcing local authority from their computer terminals. The Blue Badge Digital Service administrator at the issuing local authority can authorise access to this system.

Sharing best practice

7.43 This guidance is based on strategies used by local authorities in the past. Enforcing the Blue Badge scheme is a challenging task which often requires innovative strategies to address changing circumstances. We would therefore encourage local authorities to continue to work together and share best practice. Sharing successful techniques and cooperating with other local authorities, particularly neighbouring authorities, will ensure best use of resources and increase the chances of successful outcomes for enforcement strategies.

Further advice

Official statistics on Blue Badges

8.1 Since 1994, the DfT has carried out an annual voluntary Blue Badge survey covering local authorities in England. As badges may remain valid for a three-year period, the survey shows a rolling total of those held at 31 March each year. The data from this survey is published annually and is available on GOV.UK.

8.2 The DfT strongly encourages local authorities to complete this survey as this is currently the only data available across England and at local level on total Blue Badges issued and enforcement practices. This supports openness and transparency, allowing members of the public access to their local authority's data.

8.3 Current Blue Badge statistics, along with the latest questionnaire and guidance, can be found in the [collection for Blue Badge statistics](https://www.gov.uk/government/collections/disabled-parking-badges-statistics) (<https://www.gov.uk/government/collections/disabled-parking-badges-statistics>)

8.4 The DfT is working to reduce data collection and reporting burdens on local authorities whilst, at the same time, maintaining the time series of data and enabling the delivery of the Blue Badge reforms to be monitored and assessed. Blue Badge data will be used to support accountability of central government for national policy decisions and of local authorities for delivery of the reforms.

Blue Badge online community

8.5 A Blue Badge online community has been set up on the Local Government Improvement and Development (formerly IDeA) Communities Knowledge Hub website. This is a forum for local authority teams involved in administering and enforcing the Blue Badge scheme to share good practices, ideas, and practical tips.

8.6 The knowledge hub on-line community also contains links to documentation that local authorities in England may find useful in effectively delivering the Blue Badge scheme and contains up to date information on the DfT's reforms.

8.7 If you would like to discuss any issues raised in this guidance, or anything to do with the Blue Badge scheme, with other local authority officers working in this area then follow the link below to sign up to the [Blue Badge online community](https://khub.net/group/bluebadgeonlinecommunity) (<https://khub.net/group/bluebadgeonlinecommunity>)

8.8 The Blue Badge Digital Service team have also introduced the use of a [Slack communications tool](https://app.slack.com/client/TAHFN61B6/CAHNCBLSE/thread/CAHNCBLSE-) (<https://app.slack.com/client/TAHFN61B6/CAHNCBLSE/thread/CAHNCBLSE->

[%201565690235.352100](#)). Slack is used to keep authorities up to date with any emerging issues and also an environment for authorities to share best practice.

Visitors from outside of the UK

8.9 There are currently no formal reciprocal arrangements in place for disabled parking badges issued outside the UK.

8.10 The UK government has informal reciprocal agreements in place with other European Union governments to accept Blue Badges from these countries. In England and Wales, a parking clock is required to be displayed with the Blue Badge on single and double yellow lines and in other areas where parking is time-limited.

Local authorities should be aware that the official publication of the European Commission “parking card for people with disabilities in the European Union: conditions in the member states” states that in the UK “the parking card is used in conjunction with a parking clock. However, people from other countries who display the parking card without a parking clock will be given the same concessions.”

8.11 Local authorities should ensure that parking enforcement teams are made aware of this information. Local authorities may also wish to consider making disabled parking clocks available upon request to anyone who presents a valid disabled parking badge from Scotland, Northern Ireland, or another EU country, to avoid potential problems.

8.12 The DfT is aware of some cases where local authorities believe people may be trying to use fake badges, claiming they have been issued by another member state, but enforcement officers have remained suspicious about their validity. Recognition is voluntary, rather than mandatory, and so local authority enforcement officers can refuse to recognise an overseas badge if they have reasonable grounds to believe that it is fake or forged.

8.13 Disabled parking badges from countries outside the EU vary in design and it would be hard for local enforcement officers to verify their authenticity. DfT advise people visiting the UK from non-EU countries that they should bring their disabled parking badges with them and check with the local police or local authority in the areas they intend to visit to see if the badge would be recognised but emphasise that this entirely at the discretion of the police and local authority.

Blue Badge Digital Service

8.14 The Blue Badge Digital Service is a new service that is available to all local authorities in England from 5 February 2019. It has been built in line with GOV.UK standards and guidance. It can be accessed from anywhere with internet access, and can be accessed on a mobile, tablet, or desktop device. Your local authority Blue Badge Digital Service administrator will need to create an account for you in order to access it.

You should then be able to sign in with your email address and password. The experience will be tailored to the local authority that you are associated with (for example, you will only be able to see applications for your local authority), and the permissions that you have been assigned when your account was created (for example, only administrators can create new users).

BBDS provides the following core services:

- secure printing, personalisation and distribution of the new Blue Badge design
- a central database of all active Blue Badges, historical records to support fraud and enforcement initiatives and key information on badge holders
- an online eligibility checker and an [online application form](https://www.gov.uk/apply-blue-badge) (<https://www.gov.uk/apply-blue-badge>)
- a system support service
- continuous improvement

8.15 The Blue Badge Digital Service is a web-based, internet facing service that is accredited to HMG security requirements (OFFICIAL) and is compliant with GDPR and data protection legislation.

8.16 A central database, an online applications system and a single secure print service for the badge offers many benefits.

These include:

- fraud prevention: automated checks can be made at application stage to prevent multiple and fraudulent applications
- automated checks can reduce the need for time-consuming, paper-based checks on applicants by local authorities
- improved customer services: the service should mean quicker, easier applications for people whose circumstances have not changed
- the use of centralised government services such as Gov.UK Notify and Gov.UK Pay to allow local authorities send notifications to applicants and badge holders with the option to take payments via the new online service

- use of sophisticated anti-fraud technologies on the new badge at the lowest cost and more security in the supply, storage, and distribution
- quick and easy enforcement checks by officers from anywhere in the country on badges issued by any local authority, either using a desktop PC, handheld device, or smartphone
- significant operational and other efficiencies for local authorities

Equality Act 2010

8.17 Section 149 of the Equality Act 2010 (EA2010) [\[footnote 56\]](#) introduces a new Public Sector Equality Duty which requires public bodies - including local authorities - to have due regard to the need to:

- eliminate unlawful discrimination, harassment, victimisation, and any other conduct prohibited by the EA2010
- advance equality of opportunity between people who share a protected characteristic and those who do not foster good relations between people who share a protected characteristic and those who do not

8.18 This new duty came into force on 6 April 2011. It brings three existing duties on race, disability, and gender together into a single duty and also extends to cover age, sexual orientation, religion or belief, pregnancy and maternity, marriage and civil partnership and gender reassignment.

In order to meet this duty, a public authority must embed equality considerations in everything they do. In setting local fees and charges for badges and badge holders, the DfT recommends that local authorities check with their legal teams to ensure any local practices are consistent with the Public Sector Equality Duty. Guidance on the Public Sector Equality Duty is available on the Equality and Human Rights Commission website.

8.19 Section 20 of the Equality Act 2010 (EA2010) [\[footnote 57\]](#) [\[footnote 58\]](#) requires service providers to take reasonable steps to ensure that disabled people are not put at a substantial disadvantage compared to people who do not share the disability, when accessing services. This requirement has implications for car park operators who may have to demonstrate that, as well as marking out disabled persons' parking spaces, they have taken reasonable steps to ensure that they are available to disabled people.

8.20 A good practice guide 'inclusive mobility' has been published on access to pedestrian and transport infrastructure, which includes a chapter on parking issues. It is designed to help service providers meet their obligations under the EA2010 and provides guidance on established good practice in a general sense that relevant organisations can apply to their particular situation. See [Appendix C](#)

<https://www.gov.uk/government/publications/the-blue-badge-scheme-local-authority-guidance-england> for details of how to obtain a copy.

1. See [Chronically Sick and Disabled Persons Act 1970](https://www.legislation.gov.uk/ukpga/1970/44/section/21) (<https://www.legislation.gov.uk/ukpga/1970/44/section/21>).
2. See [Equality Act 2010](https://www.legislation.gov.uk/ukpga/2010/15/contents) (<https://www.legislation.gov.uk/ukpga/2010/15/contents>)
3. See [Gender Recognition Act 2004](https://www.legislation.gov.uk/ukpga/2004/7/contents) (<https://www.legislation.gov.uk/ukpga/2004/7/contents>)
4. See [Gender Recognition Act 2004](https://www.legislation.gov.uk/ukpga/2004/7/section/22) (<https://www.legislation.gov.uk/ukpga/2004/7/section/22>)
5. See [The Disabled Persons \(Badges for Motor Vehicles\) \(England\) \(Amendment\) \(No.2\) Regulations 2011](http://www.legislation.gov.uk/uksi/2011/2675/made) (<http://www.legislation.gov.uk/uksi/2011/2675/made>)
6. See [AFIP](https://www.gov.uk/claim-for-injury-received-while-serving/armed-forces-independence-payment-afip) (<https://www.gov.uk/claim-for-injury-received-while-serving/armed-forces-independence-payment-afip>)
7. See relevant section of [National Health Service Act 2006](http://www.legislation.gov.uk/ukpga/2006/41/schedule/1/crossheading/provision-of-vehicles-for-disabled-persons) (<http://www.legislation.gov.uk/ukpga/2006/41/schedule/1/crossheading/provision-of-vehicles-for-disabled-persons>)
8. See [National Health Service \(Scotland\) Act 1978](https://www.legislation.gov.uk/ukpga/1978/29/section/46) (<https://www.legislation.gov.uk/ukpga/1978/29/section/46>)
9. Until 2011 letters were issued by the Pension, Disability & Carers Service, which merged into DWP in 2011
10. See GOV.UK guidance on [Registering vision impairment as a disability](https://www.gov.uk/government/publications/guidance-published-on-registering-a-vision-impairment-as-a-disability) (<https://www.gov.uk/government/publications/guidance-published-on-registering-a-vision-impairment-as-a-disability>)
11. Veterans UK replaced the Service Personnel and Veterans Agency on 1 April 2014
12. Veterans UK replaced the Service Personnel and Veterans Agency on 1 April 2014
13. See [The Armed Forces and Reserve Forces \(Compensation Scheme\) Order 2011](https://www.legislation.gov.uk/uksi/2011/517/contents) (<https://www.legislation.gov.uk/uksi/2011/517/contents>)
14. See [The Disabled Persons \(Badges for Motor Vehicles\) \(England\) Regulations 2000](https://www.legislation.gov.uk/uksi/2000/682/contents/made) (<https://www.legislation.gov.uk/uksi/2000/682/contents/made>)
15. See [The Disabled Persons \(Badges for Motor Vehicles\) \(England\) \(Amendment\) Regulations 2019](http://www.legislation.gov.uk/uksi/2019/891/contents/made) (<http://www.legislation.gov.uk/uksi/2019/891/contents/made>)
16. See [The Disabled Persons \(Badges for Motor Vehicles\) \(England\) \(Amendment\) Regulations 2019](http://www.legislation.gov.uk/uksi/2019/891/contents/made) (<http://www.legislation.gov.uk/uksi/2019/891/contents/made>)

17. See [The Disabled Persons \(Badges for Motor Vehicles\) \(England\) Regulations 2000](https://www.legislation.gov.uk/ukxi/2000/682/contents/made) (<https://www.legislation.gov.uk/ukxi/2000/682/contents/made>)
18. See [Chronically Sick and Disabled Persons Act 1970](https://www.legislation.gov.uk/ukpga/1970/44/section/21) (<https://www.legislation.gov.uk/ukpga/1970/44/section/21>)
19. See [The Disabled Persons \(Badges for Motor Vehicles\) \(England\) Regulations 2000](https://www.legislation.gov.uk/ukxi/2000/682/introduction/made) (<https://www.legislation.gov.uk/ukxi/2000/682/introduction/made>)
20. See [The Disabled Persons \(Badges for Motor Vehicles\) \(England\) \(Amendment\) \(No.2\) Regulations 2011](http://www.legislation.gov.uk/ukxi/2011/2675/contents/made) (<http://www.legislation.gov.uk/ukxi/2011/2675/contents/made>)
21. See [Chronically Sick & Disabled Persons Act 1970](https://www.legislation.gov.uk/ukpga/1970/44/contents) (<https://www.legislation.gov.uk/ukpga/1970/44/contents>)
22. See [Road Traffic Regulation Act 1984](https://www.legislation.gov.uk/ukpga/1984/27/contents) (<https://www.legislation.gov.uk/ukpga/1984/27/contents>)
23. The [Local Government Ombudsman](https://www.lgo.org.uk/) (<https://www.lgo.org.uk/>)
24. [DPTAC](https://www.gov.uk/government/organisations/disabled-persons-transport-advisory-committee) (<https://www.gov.uk/government/organisations/disabled-persons-transport-advisory-committee>)
25. The [Local Government Ombudsman](https://www.lgo.org.uk/) (<https://www.lgo.org.uk/>)
26. See [Chronically Sick and Disabled Persons Act 1970](https://www.legislation.gov.uk/ukpga/1970/44/section/21) (<https://www.legislation.gov.uk/ukpga/1970/44/section/21>)
27. See [Chronically Sick and Disabled Persons Act 1970](https://www.legislation.gov.uk/ukpga/1970/44/section/21) (<https://www.legislation.gov.uk/ukpga/1970/44/section/21>)
28. [National Fraud Initiative \(NFI\)](https://www.gov.uk/government/collections/national-fraud-initiative) (<https://www.gov.uk/government/collections/national-fraud-initiative>)
29. The [Fraud Act 2006](https://www.legislation.gov.uk/ukpga/2006/35) (<https://www.legislation.gov.uk/ukpga/2006/35>)
30. See [The Disabled Persons \(Badges for Motor Vehicles\) \(England\) Regulations 2000](https://www.legislation.gov.uk/ukxi/2000/682/contents/made) (<https://www.legislation.gov.uk/ukxi/2000/682/contents/made>)
31. The [Fraud Act 2006](https://www.legislation.gov.uk/ukpga/2006/35/section/2) (<https://www.legislation.gov.uk/ukpga/2006/35/section/2>)
32. See [The Disabled Persons \(Badges for Motor Vehicles\) \(England\) Regulations 2000](https://www.legislation.gov.uk/ukxi/2000/682/regulation/8/made) (<https://www.legislation.gov.uk/ukxi/2000/682/regulation/8/made>)
33. The Disabled Persons (Badges for Motor Vehicles)(England) Regulations 2000
34. The [Road Traffic Regulation Act 1984](https://www.legislation.gov.uk/ukpga/1984/27/section/117) (<https://www.legislation.gov.uk/ukpga/1984/27/section/117>)
35. The [Fraud Act 2006](https://www.legislation.gov.uk/ukpga/2006/35/contents) (<https://www.legislation.gov.uk/ukpga/2006/35/contents>)
36. See [Chronically Sick and Disabled Persons Act 1970](https://www.legislation.gov.uk/ukpga/1970/44/section/21) (<https://www.legislation.gov.uk/ukpga/1970/44/section/21>)

37. The [Road Traffic Regulation Act 1984](https://www.legislation.gov.uk/ukpga/1984/27/section/115)
(<https://www.legislation.gov.uk/ukpga/1984/27/section/115>)
38. The [Fraud Act 2006](https://www.legislation.gov.uk/ukpga/2006/35/contents) (<https://www.legislation.gov.uk/ukpga/2006/35/contents>)
39. The [Forgery & Counterfeiting Act](https://www.legislation.gov.uk/ukpga/1981/45)
(<https://www.legislation.gov.uk/ukpga/1981/45>)
40. The [Theft Act 1968](https://www.legislation.gov.uk/ukpga/1968/60) (<https://www.legislation.gov.uk/ukpga/1968/60>)
41. The [Proceeds of Crime Act 2002](https://www.legislation.gov.uk/ukpga/2002/29/section/329)
(<https://www.legislation.gov.uk/ukpga/2002/29/section/329>)
42. See [Powers of Criminal Courts \(Sentencing\) Act 2000](https://www.legislation.gov.uk/ukpga/2000/6/section/146)
(<https://www.legislation.gov.uk/ukpga/2000/6/section/146>)
43. The [Fraud Act 2006](https://www.legislation.gov.uk/ukpga/2006/35/section/7) (<https://www.legislation.gov.uk/ukpga/2006/35/section/7>)
44. The [Fraud Act 2006](https://www.legislation.gov.uk/ukpga/2006/35/section/9) (<https://www.legislation.gov.uk/ukpga/2006/35/section/9>)
45. The [Fraud Act 2006](https://www.legislation.gov.uk/ukpga/2006/35/section/11) (<https://www.legislation.gov.uk/ukpga/2006/35/section/11>)
46. See [Chronically Sick and Disabled Persons Act 1970](https://www.legislation.gov.uk/ukpga/1970/44/section/21)
(<https://www.legislation.gov.uk/ukpga/1970/44/section/21>)
47. See [Chronically Sick and Disabled Persons Act 1970](https://www.legislation.gov.uk/ukpga/1970/44/section/21)
(<https://www.legislation.gov.uk/ukpga/1970/44/section/21>)
48. The [Road Traffic Regulation Act 1984](https://www.legislation.gov.uk/ukpga/1984/27/section/115)
(<https://www.legislation.gov.uk/ukpga/1984/27/section/115>)
49. The Road Traffic Regulation Act 1984
50. See [Chronically Sick and Disabled Persons Act 1970](https://www.legislation.gov.uk/ukpga/1970/44/section/21)
(<https://www.legislation.gov.uk/ukpga/1970/44/section/21>)
51. The [Disabled Persons Parking Badges Act 2013](https://www.legislation.gov.uk/ukpga/2013/4/contents)
(<https://www.legislation.gov.uk/ukpga/2013/4/contents>)
52. See [The Disabled Persons \(Badges for Motor Vehicles\) \(England\) Regulations 2000](http://www.legislation.gov.uk/uksi/2000/682/regulation/9/made)
(<http://www.legislation.gov.uk/uksi/2000/682/regulation/9/made>)
53. See [Regulation of Investigatory Powers Act 2000](https://www.legislation.gov.uk/ukpga/2000/23/contents)
(<https://www.legislation.gov.uk/ukpga/2000/23/contents>)
54. The [Data Protection Act 2018](http://www.legislation.gov.uk/ukpga/2018/12/contents/enacted)
(<http://www.legislation.gov.uk/ukpga/2018/12/contents/enacted>)
55. The [Equality Act 2010](https://www.legislation.gov.uk/ukpga/2010/15/section/149)
(<https://www.legislation.gov.uk/ukpga/2010/15/section/149>)
56. Previously contained in Part 3 of the Disability Discrimination Act 1995, since repealed.
57. The [Equality Act 2010](https://www.legislation.gov.uk/ukpga/2010/15/contents) (<https://www.legislation.gov.uk/ukpga/2010/15/contents>)

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