

## **P-06-1380 Make Blue badge Applications Lifelong for individuals who have a lifelong diagnosis - Correspondence from the Petitioners to the Committee, 03 March 2025**

Ken Skates states 04<sup>th</sup> February 25

1. With the limited resources of the Welsh Government, I cannot pursue legislation to make Blue Badges lifelong
2. Blue Badge eligibility is determined by mobility needs rather than medical diagnoses
3. It is important to protect the scheme's fairness and effectiveness
4. Local authorities administering the scheme currently have the discretion to determine if an applicant's impairment is unlikely to improve. In such cases, they can streamline the application process through the "Not for Reassessment" (NfR) route
5. I acknowledge that the NfR route does not always work smoothly for applicants. To address this, my officials will continue collaborating with local authorities to enhance the guidance and streamline the process. We will explore with local authorities the potential for a voluntary Code of Practice
6. The Welsh Government will also maintain funding for the Independent Advisory Service in Wales to assist local authorities with assessments and to provide ongoing training for assessors.

1. As Ken states 'The eligibility criteria for a blue badge has been subject to many reviews, reports and consultations and regulations since 2002', our findings reveal the same issues are still being raised and little progress has been made, this is costing the Government, both in terms of time and money, to continue applying temporary fixes to a system that is clearly not working. A blue badge is a lifeline, offering freedom and independence, allowing individuals to experience a sense of normality. Yet, obstacles remain, making it harder for those who depend on it, to access the support they desperately need.
2. Ken states eligibility is determined by mobility needs rather than medical diagnosis, what about Severe Cognitive Impairment, this is also on the eligibility criteria and seems to be overlooked
3. Protecting the scheme's fairness and effectiveness- The current scheme does not show fairness or effectiveness with the constant barriers faced by individuals when trying to apply for a blue badge, please see attached, a parents renewal application experience, a parent that had discussed the 'Not for reassessment' award, it had been verbally agreed and a note to be put on file, but when actually renewed was told " Our system does not allow us to action her badge for not for reassessment under the DLA criteria only when it's applied under walking disability or cognitive reasons – this

person is severely cognitively impaired and on the learning disability register. How is this fair or effective, this is only one example

Please see Local Authorities questions and statement 'There are no technical capabilities in place within the system for this this to be highlighted automatically when an assessor accesses an applications account e.g. no 'pop up' box highlighting 'not for reassessment'

4. How can local authorities use discretion to determine if an applicant's impairment is unlikely to improve when they don't have formal /mandatory /medical training (enforceable, not awareness) please see FOI
5. Not for Reassessment /NFR is no where to be seen in the guidance – it is referenced under **Streamlined processes** - *Where the local authority is satisfied that an applicant will permanently meet the eligibility criteria, the local authority is able to mark their records as such to shorten the 'renewal' process when their badge expires. This will be the case where a person clearly meets the criteria and their impairment will not improve, such as a double amputee. In such cases the applicant will have a simplified renewal process, only needing to supply evidence of their identity, residence and a photograph. They will still be expected to sign the declaration form.*

It is not mentioned in the booklet [Who is eligible for a Blue Badge?](#), however 'eligible without further assessment' can be seen. The language needs to be clearer.

At the beginning of our petition Lee Waters was Cabinet secretary for Transport, in a letter to Mark Isherwood on 15<sup>th</sup> January 2024 he stated ' Local authorities can decide if a blue badge should be awarded for life ' however WLGA state ' As there is a requirement to renew badges every three years, we do not believe there to be any lifelong badges'

Nothing is clear, you can understand why this can cause confusion, so many mixed messages. Many people are not aware NFR exists, this language is not used in any documentation. When people are now aware (petitioners) of NFR, the process is definitely not streamline, clearer language and more consistent communication is needed.

6. The Welsh Government will also maintain funding for the Independent Advisory Service in Wales to assist local authorities with assessments and to provide ongoing training for assessors.
  - a. Training, Lee Water in a letter to Jack Sargeant on January 23<sup>rd</sup>, 2024 Stated *'The Welsh Government's guidance for local authorities on how to deliver the Blue Badge scheme recommends that all members of staff who deal regularly with applicants and badge holders should receive disability and equality awareness training  
However, this guidance is non-statutory and we are unable to direct local authorities to provide specific training for individual staff. In 2020, my officials*

*held a workshop on the social model of disability for local authority staff dealing with blue badge applications'*

As you can see training is non-statutory – not enforceable and when we requested data on who attended workshops, Lee could not provide this I refer to point 4, if training is non enforceable / non statutory how can decisions be made to determine if an applicant's impairment is unlikely to improve, sure they aren't qualified to do so.

- b.** No Appeals Process The booklet "Who is eligible for a Blue Badge?" states on the last page that "The local authority's decision on eligibility is final" in bold, which can be intimidating for readers. This language may discourage individuals from seeking further explanation or pursuing the application process, as they might assume there is no way to challenge the decision. Additionally, the booklet does not mention the availability of the Independent Advisory Service

**The Equality Act 2010** states it allows for the better or more favourable treatment of people with impairments based on the evidence given, to provide equality of opportunities.

**Well-being of Future Generations (Wales) Act 2015** Participation and Engagement: The Act emphasises the importance of involving all people, including those with disabilities, in decision-making processes that affect their lives, **ensuring that their voices are heard and valued.**

**Social justice** is the view that everyone deserves equal economic, political, and social right and opportunities

A quote from one our *petitioners* ' *Someone listening to you can share your worries and burdens, someone hearing you and understanding they can make an impact.*'

Petitioner's do not feel heard

Change is needed

- Listen to individuals with lived experiences, act on the feedback they provide, and collaborate to implement meaningful change
- Award lifetime badges or extend duration
- All local authorities implement the scheme in the same way and through the same departments.
- Training and code of conduct should be mandatory, not optional
- Use clear language in communications, such as booklets, guidelines, and other materials.
- Introduce an Appeal process

---

## Blue badge Petition

Parents response to Ken Skates Letter dated February 4<sup>th</sup> 2024 and WGLA and 2019 report

In response to Ken's Letter. At the start of his letter he states that a blue badge is 'determined by mobility needs rather than medical diagnosis'. Ken makes no mention of any conditions of cognitive impairment that would put someone in danger. This makes me question if he understands the full independence a badge gives to an individual with various disabilities, not just those with mobility struggles.

Looking at the 'Written Statement: Eligibility and Implementation' report and highlighting a few recommendations that stood out to me.

Recommendation 7- for all staff who undertake blue badge assessments to be trained and apply the social model of disability- REJECTED. The blue badge helps remove a large barrier for many disabled people who are trying to access the local community, gain independence and some normality in what could be an ever changing new world for them. If staff undertook a small amount of training to understand the barriers disabled people faced this could make a huge impact on the application process.

Recommendation 8- Excellent news that this changed from REJECTED to accept in principle. However, what has happened since the report to improve things? The Welsh government should be pushing the UK government to make public transport inclusive. It is encouraged to use public transport yet it is inaccessible to many.

Recommendation 9- there is still no official Appeals process, meaning that if someone is rejected: for a variety of reasons, they have to provide more evidence or take matters further. This in turn can cause excess stress, worry and isolation.

Recommendation 13- the Welsh Government works with the WLGA to develop a process to enable those suffering with a life-long or deteriorating condition to renew their blue badge automatically, without further assessment. - REJECTED on the grounds of Not for reassessment.. If we look at the response from the WLGA they have NO belief that anyone has a lifelong badge. This shows that not for reassessment doesn't work. Regardless of condition you are required to reapply for a badge every 3 years.

Going back to Ken's letter he says that 'Local authorities administering the scheme currently have the discretion to determine if an applicant's impairment is unlikely to improve', how are they meant to do this with no formal or mandatory training? They can not make an educated decision if they do not have all the information provided to them. He goes on to say he will 'explore the potential for a voluntary Code of Practice to set out more clearly the service that applicants can expect' nothing should be voluntary, it should be one code of practice for all. This would make the application process easier and less complicated. It would also make sure the scheme is fair and effective in all ways as everyone will be following the same set of rules and regulations

You currently have various agencies and departments issuing blue badges. This does not help with the consistency, fairness and effectiveness across the board.

2019 was 6 years ago. Even before this as there had been previous implementations surrounding the blue badge. Nothing has changed. We, the people who require the badges, are still putting forward the same complaints and problems for the Welsh government to address and assist with. Half a decade, and more, is a long time for no progress.

We very much appreciate Ken's officials meeting with us and whilst they may have listened they may not have heard what we had to say. I think the documents speak volumes for us in that sense. Someone listening to you can share your worries and burdens, someone hearing you and understanding they can make an impact.

---

**Blue badge renewal request – Blue badge permit team – Denbighshire**  
**'Not For reassessment'**

On 27 Feb 2025, at 15:06, Blue Badge <[blue.badge@denbighshire.gov.uk](mailto:blue.badge@denbighshire.gov.uk)> wrote:

Regarding your meeting this afternoon, I suggest raising the following with the AS's:

Can you explain how you believe the 'not for reassessment' process to work?  
i.e. do you believe that there is a technical capability within the system that recognises and highlights these customers automatically? Press a button and the Badge reissued automatically??

While councils understand that Walking Ability applications can be eligible for 'not for reassessment' - this is currently applied manually

Council can only do this by adding the verbatim to the applicant details i.e. manual intervention.

There are no technical capabilities in place within the system for this to be highlighted automatically when an assessor accesses an applications account e.g. no 'pop up' box highlighting 'not for reassessment'

Further to this, an applicant still has to provide up to date proof of ID, address and a photo every 3 years to maintain the Blue Badge.

Cofion/Regards

Tim Trwydded Bathodyn Glas / Blue Badge Permit Team

Gwasanaeth Cymorth Corfforaethol – Pobl / Corporate Support Service – People  
Cyngor Sir Ddinbych / Denbighshire County Council  
[sirddinbych.gov.uk](http://sirddinbych.gov.uk) / [denbighshire.gov.uk](http://denbighshire.gov.uk)

From: Blue Badge <[blue.badge@denbighshire.gov.uk](mailto:blue.badge@denbighshire.gov.uk)>

Date: 19 February 2025 at 09:16:03 GMT

Subject: RE: Blue badge renewal

Good morning

Our system does not allow us to action her badge for not for reassessment under the DLA criteria only when it's applied under walking disability or cognitive reasons.

As you are probably aware she doesn't get assessed on her application if she is receiving the higher rate mobility component of the award.

Hope this helps.

Cofion/Regards

Tîm Trwydded Bathodyn Glas / Blue Badge Permit Team

---

Sent: 18 February 2025 13:36

To: Blue Badge <[blue.badge@denbighshire.gov.uk](mailto:blue.badge@denbighshire.gov.uk)>

Subject: Re: Blue badge renewal

Hello blue badge team

Just for clarity....

You have issued XXXXXXX's badge on the automatic DLA high rate criteria, but I want her to be additionally under the severe cognitive impairment as she is severely cognitively impaired and on the learning disability register.

Therefore she can then be "not for reassessment?"

I had discussed this about 9 months ago with the blue badge team manager and she said that when XXXXXXX's badge came up to be reissued this would be actioned?

I did ask for clarification prior to you issuing the badge?

Please could you advise further?

Kind regards

---

On 18 Feb 2025, at 12:35, Blue Badge <blue.badge@denbighshire.gov.uk> wrote:

Good afternoon

Thank you for your enquiry and apologies for the late reply.

Regarding XXXXX's badge, she is a not for reassessment as she receives higher rate mobility DLA, and those badges are an automatic qualification.

However, due to Welsh government guidance we will require a new application every 3 yrs regardless of it being a "not for reassessment" application.

Cofion/Regards

Tîm Trwydded Bathodyn Glas / Blue Badge Permit Team

---

Sent: 14 February 2025 11:06

To: Blue Badge <blue.badge@denbighshire.gov.uk>

Subject: Re: Blue badge renewal

Hello blue badge team

I have received notification that my daughter's blue badge is being reissued today.

As per previous email below, I wanted to clarify if you have reissued the badge on the -  
'not for reassessment' basis?

Please could you respond and clarify for me?

Kind regards

---

On 10 Dec 2024, at 21:24

Hello Blue Badge Team Hello Blue Badge Team

Re Application for a Blue Badge under the 'Not for reassessment' criteria -

I'm reapplying for my daughter's blue badge

I know I've had this discussion with your team before regarding issuing life long Blue badges for individuals who have life long conditions, and was told to submit the application when next due. Hopefully there is a note on Xxxxxxxx's record to this effect with the Blue badge Manager who I discussed this with approximately 12months ago. xxxxxxxx diagnosis is genetic and lifelong.

STAND (Stronger together for additional needs and disabilities) and myself forwarded a petition to the Welsh Government and it was debated in the Senedd.

We were informed that individuals who permanently met the eligibility criteria can be awarded a badge on a 'not for reassessment' basis. (Documentation of this attached in blue badge application).

Please could you consider issuing Xxxxxxx blue badge under this 'not for reassessment' criteria therefore saving us and yourselves the additional time that this process takes.

Please could you let me know if this is possible.

Kind regards

---



## Blue Badge Petition - Make Blue badge Applications Lifelong for individuals who have a lifelong diagnosis

1. Are you aware that there is an option for lifelong blue badges?
2. How many individuals have been awarded lifelong blue badges? If so, could you provide us with a breakdown for the last 5 years?
3. What qualifications or training do desk-based assessors have in health, ALN or disability

	RECIEVED	
Conwy	19/01/24	<ol style="list-style-type: none"> <li>1. We are unable to award a lifelong badge. “Indefinite or “life” awards are not available as all badges are valid for 3 years. Some people refer to applicants being given an award for life but that this really is a marker that no further assessment is required. This means that when re-applying in three years’ time no further medical evidence is needed to support the application – only proof of ID and residency in Conwy.</li> <li>2. <b>None</b> -As mentioned in the previous question we do not award lifelong blue badges to applicants</li> <li>3. 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 in accordance with the governing legislation. All staff complete the local authority’s disability and equality awareness training programme. This includes information on the social model of disability.</li> </ol> <p>All administrators of the Blue Badge scheme follow processes on how to administer the scheme, including policy on circumstances when local authorities will charge for a Blue Badge in the case of a replacement or organisational badge, as well as procedures for reviewing decisions. When they are unable to come to a clear decision to award a Blue Badge they can refer to an Independent Advisory Service for further assessment.</p>

		<p>If you are dissatisfied with the handling of your request, you have the right to ask for an internal review. Internal review requests should be submitted within two months of the date of receipt of this response and should be sent to the Council's Information Governance Unit.</p>
Denbighshire	09/01/24	<ol style="list-style-type: none"> <li>00001967 - As per the Welsh Government guidelines, Local Authorities can 'mark' a customer account with 'not for reassessment' - if submitted based on 'walking ability'. This means – on expiry - the badge can be reissued automatically on presentation of a photo, proof of id and address without evidence. This does not apply to DLA, PIP applications.</li> <li>31 badges - 2018 – 18, 2019 – 12 badges, 2020 - November 23 – 1 Badge, Until November is as far as report go. 2023 – This is because most applicants use their DLA / PIP award as evidence for their application - which cannot be marked 'not for further assessment'</li> </ol> <p>Using the 'walking ability' option on the application form (not DLA / PIP award as the reason for their application) the badge holder will have to continue to reapply every 3 years using the online application form and can attach photos of all the evidence required to the online application with a request for it to be marked as 'not for reassessment' (first time only)</p> <p>Once this is processed, the 'not for reassessment' will be in place for all future applications (stays on the account permanently) – a 'life award' is not a term used by LA administrators.</p>
	09/01/23	<ol style="list-style-type: none"> <li>00001975 - I can confirm that staff: complete the Welsh Government (Blue Badge Local Authority Verification Toolkit) training; complete intense job shadowing training exercise with experienced and knowledgeable staff members, attend benchmarking groups meetings with other LA's to discuss potential complex 'loss/lack of mobility' cases. seek specialist advice from the Welsh Government Independent Assessors/Advisors Able 2</li> </ol>
Flintshire		<ol style="list-style-type: none"> <li>F00021931 – Yes</li> <li>428 issued between 01/01/19 to 01/01/24 by the Independent Mobility Assessor (IAS). We are unable to give you a breakdown, the team are presented with an overall total.</li> <li>F00021933 - Our assessors do not hold health, ALN or disability qualifications. Blue Badge applications are assessed based on the blue badge Local Authority Toolkit which has been</li> </ol>

		prepared by the Welsh Government to help local authorities manage the application and verification process for a Blue Badge across Wales.
Anglesey	03/01/24	<ol style="list-style-type: none"> <li>1. Yes, we are aware that LAs can flag on the Blue Badge Digital System (BBDS) if they have assessed someone for a Blue Badge or have referred an application to the Blue Badge Independent Advisory Service and they have recommended to the LA that the applicant is eligible and should be awarded a badge for life. By flagging this on the system we will then know that the BB holder will still have to re-apply for a BB every 3 years before their existing badge expires but We would still however need to check their identity, address etc to ensure against fraudulent applications.</li> <li>2. <b>None</b></li> <li>3. Desk based assessors abide to the Local Authority verification toolkit that is provided by the Welsh Government.”</li> </ol>
Gwynedd,	16/02/24  18/01/24	<ol style="list-style-type: none"> <li>1. We do have some applications that are recommended to be awarded for life. Which means they do not require reassessment when re-applying for a blue Badge at the end of the three year validity period.</li> <li>2. How many individuals have been awarded lifelong blue badges? If so, could you provide us with a breakdown for the last 5 years? We have 69 applications that have been recommended to be awarded for life by the IAS (Independent Assessment Service) .</li> <li>3. All our desk based assessors are trained to use the Welsh Government Blue Badge Assessment Tool Kit. If we are unable to come to a decision on an application using the Welsh Government desk based assessment toolkit, applications are forwarded to the Independent Mobility Assessors, who are contracted by Welsh Government to carry out further desk based assessments and face to face assessments. I am unable to comment on what training the Mobility Assessors have, as they are not employed by Cyngor Gwynedd”.</li> </ol>
Wrexham	15/01/24	<ol style="list-style-type: none"> <li>1. 4035 - Blue Badges are issued for a period of 3 years in Wales and we are not aware that there is an option for lifelong badges, as part of our process we record if a customer has benefits or condition that are unlikely to improve so that the process is extremely straightforward when they reapply.</li> <li>2. How many individuals have been awarded lifelong blue badges? If so, could you provide us with a breakdown for the last 5 years? <b>Nil</b></li> </ol>

	15/01/24	3. 4040 –Desk based Advisors are not trained in Health, ALN or disability, if there are cases which is not straight forward then the application is referred for an independent assessment to a qualified Occupational Health officer.
--	----------	--