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14th November 2025

Dear Petitions Committee

Thank you for informing us of the new date for the petition to be discussed and for the attached response, letter from KS to CT.

Can we enquire if there have been any further discussions following the last Petitions Committee meeting, and if there are any updates you're able to share?

Following the plenary session on 22nd October 25, we had thought there would be a meeting between Jane Hutt and Ken Skates following Jane Hutt's response to Mark Isherwood's question.

MI - Earlier this month, in his latest response to my correspondence on behalf of a constituent regarding the blue badge scheme, the transport Secretary explained, once again, that local authorities administer the scheme using guidance and a toolkit issued by the Welsh Government. However, it is inconsistent top-down local authority interpretation of this guidance that leads repeatedly to disabled applicants being denied a new or renewed blue badge. The Welsh Government's continued refusal to deliver a life award for those with lifelong non-improving conditions defies logic and challenges the Welsh Government's claim to champion the social model of disability. What action will you therefore take to ensure that proper attention is given to the findings from the stakeholder survey conducted this summer by STAND North Wales CIC, which received 636 responses from 20 counties in Wales in just 25 days, and which found, and I quote:121

'The current Blue Badge system in Wales creates barriers rather than removing them, contradicting the goals of disability rights legislation'?122

It recommended changes, including a life award, to better serve disabled individuals and carers across Wales and fulfil the Welsh Government's legal and moral responsibilities. I'd be grateful to hear whether you will give that attention. And would like to respond to KS Letter

JH - Thank you very much, Mark Isherwood. I certainly will be giving this attention alongside the Cabinet Secretary for transport

The current Blue Badge Scheme in Wales fails to uphold the Welsh Government's stated commitment to the Social Model of Disability, social justice, and its equality and human rights duties under the Equality Act 2010 & Public Sector Equality Duty (PSED), Human Rights Act 1998, Social Services and Well-being (Wales) Act 2014, and Well-being of Future Generations (Wales) Act 2015.

Currently

No lifetime awards for lifelong conditions

Individuals with lifelong diagnoses or permanent disabilities are not eligible for lifetime Blue Badges.

- This undermines dignity and autonomy, forcing disabled people into repeated cycles of reassessment that waste time, money, and emotional energy. From the perspective of the Social Model of Disability, these unnecessary barriers are created by the system, not by impairment. A socially just system would recognise permanence, remove avoidable hurdles, and reduce repeated burdens on individuals and families.

Renewals are treated as first-time applications

Each renewal is processed as if it were a new application, as quoted by blue badge team administrator

- This ignores the permanence of certain disabilities and forces applicants to repeatedly 'prove' their condition, creating unnecessary stress, expense, and delay. This is a clear example of disabling bureaucracy, inconsistent with the Social Model of Disability

No renewal reminders – leading to fines

- There is no system to notify badge holders when their badge is due to expire.

Those with cognitive impairments, learning disabilities may be unaware their badge has lapsed. The absence of reminders is directly resulting in avoidable fines, vehicle penalties, and unnecessary financial hardship, outcomes that punish disabled people for administrative oversight. From the Social Model of Disability perspective, these negative outcomes are caused by systemic barriers, not by the individual's impairment.

Delays and Limited Reassessment Exemptions

Many applicants experience long delays in processing and decision-making

- These delays and repeated assessments cause unnecessary stress, uncertainty, and loss of independence for disabled people and their families.

- From the Social Model of Disability perspective, these delays and procedural barriers are created by the system, not by an individual's impairment.

No appeal process

There is no appeal process for applicants who are refused a new or renewed Blue Badge Applicants

- This lack of clarity and accountability denies fairness and contradicts the principles of equality and social justice, leaving applicants without any way to challenge inconsistent or unfair decisions.
- From the perspective of the Social Model of Disability, these barriers are created by the system rather than the individual's impairment.

Inconsistent interpretation by local authorities

Local Authorities interpret Welsh Government guidance differently, producing unequal outcomes across Wales which results in a postcode lottery

- There are many inconsistencies across Local authorities in how they interpret Welsh Government guidance, creating unequal outcomes across Wales and resulting in a postcode lottery. This inconsistency leads to unfair treatment and undermines the goal of equal access to public services.
- From the Social Model of Disability perspective, these inequalities are not caused by individual's impairments but by systemic and administrative barriers.

Prioritising Mobility over Severe Cognitive and Hidden Disabilities

The Blue Badge application process places a heavy focus on physical mobility, often excluding individuals with cognitive or hidden disabilities.

- Although Welsh Government guidance recognises eligibility for people with severe cognitive impairments, many applicants are still denied badges due to inconsistent interpretation, insufficient assessor training, and some not being properly included within the assessment criteria.
- From the view of the Social Model of Disability, this approach fails to recognise that people are disabled by barriers in society, not by their impairments. A fair and inclusive system would ensure that hidden and cognitive disabilities are equally understood, respected, and accommodated within the eligibility criteria and assessment process.

Legislative and Policy Duties

Equality Act 2010 & Public Sector Equality Duty (PSED)

Public bodies have a duty to eliminate discrimination, advance equality of opportunity, and foster good relations for people with protected characteristics, including disability.

- Failing to provide reminders, reasonable adjustments, or consistent decision-making in the Blue Badge process breaches these duties.
- It also undermines the requirement to eliminate **discrimination** and to advance equality of opportunity between disabled and non-disabled people

Social Services and Well-being (Wales) Act 2014

Requires local authorities to promote independence and well-being.

- The current Blue Badge process undermines these principles by placing unnecessary dependency on others and stress forcing disabled people to rely more on others

Well-being of Future Generations (Wales) Act 2015 Well-being of Future Generations (Wales) Act 2015

Requires public bodies to promote a more equal Wales and adopt long-term, preventative approaches.

- The current Blue Badge process, which requires repeated reassessments and does not prevent unnecessary fines, is not sustainable or equitable, undermining the Act's goals of equality and long-term well-being.

Human Rights Act 1998

Public bodies must respect and protect people's human rights.

- The Blue Badge process, with repeated reassessments and stress, can limit rights to family life (A8) and freedom from discrimination (A14).
- Failing to provide fair, consistent, and accessible procedures undermines the dignity and equality of disabled people.

Although the Welsh Government says it follows the Social Model of Disability, the way the Blue Badge process works does not reflect this in practice. The process still places responsibility on disabled people to prove their needs, instead of removing the barriers created by the system itself.

Repeated reassessments, lack of reminders, no appeal process, and inconsistent decisions between local authorities all show that the system is still based on a medical view of disability rather than a social one.

To truly apply the Social Model, the Blue Badge process needs to recognise lifelong conditions, reduce unnecessary paperwork, and make the system fair, consistent, and respectful for all disabled people across Wales.

Responding to KS letter to CT dated 7th November

Petitioners feel that the most recent response is very similar to previous ones, appearing generic and repetitive, as though copied and pasted. There is a strong view that Ken Skates, has not fully engaged with or considered the detailed information and evidence submitted by petitioners.

Additionally, Ken Skates continues to focus primarily on the 'mobility' criteria for Blue Badges. There is significant concern about the ongoing lack of reference to individuals with severe cognitive impairments and hidden disabilities, whose needs are equally relevant and must be properly recognised

"I can confirm that my officials have already received a copy of the survey undertaken by STAND north Wales and I would like to thank them for their work, and their findings have been noted.

We are pleased that Ken Skates has received the survey, however, we are disappointed that we have not yet received any response or feedback on our findings, leaving us wondering which points have been noted.

Also, despite several invitations to meet, particularly given that his constituency is close to STAND North Wales CIC, Ken Skates has so far declined, which raises the question of why?

As the Cabinet Secretary for Social Justice and I have previously highlighted, we are committed to ensuring that the Blue Badge scheme remains robust and fair, and that the process of obtaining a badge is as efficient as possible.

Despite stating commitment to ensuring the Blue Badge scheme remains robust, fair, and efficient, the current renewal process undermines these aims and fails to uphold Wales's obligations under the Social Model of Disability, Social Justice principles, and the Equality and Human Rights legislative framework.

The current process, results in bureaucratic repetition, creates unnecessary administrative and emotional burden on disabled people, inflicts a process based barrier that conflicts with the Social Model of Disability, which identifies disabling barriers in systems, contradicts the Public Sector Equality Duty (PSED) under the Equality Act 2010, which requires public bodies to eliminate discrimination, advance equality of opportunity, and foster good relations, is inconsistent with the Well-being of Future Generations (Wales) Act 2015 and the Social Services and Well-being (Wales) Act 2014, which both prioritise dignity, independence, and reducing inequality.

I have provided the committee with a copy of my written statement on the Review of the Blue Badge Scheme in Wales. The review provided 5 recommendations, all of which were accepted by the Welsh Government. Officials are now in the process of considering and acting on those recommendations. As part of this work, a Blue Badge workgroup was held by officials with 22 local authorities and stakeholders in June this year. Following this workgroup, two further training sessions were held in July for local authority staff, specifically on streamlining applications 'Not for Reassessment'. STAND north Wales shared their personal experiences of applying and reapplying for a blue badge at these sessions.

Representatives from STAND North Wales and petitioners were invited to the Blue Badge workshop on 17 July 2025. And were very grateful for the opportunity, they felt that their stories had some impact on local authority members. However, it was felt that it was largely a tick box exercise.

Participants were asked to share their lived experiences and were then asked to leave the meeting, with no opportunity to listen or participate in the following discussions. Furthermore, the Teams chat which was still visible to us, showed confusion among local authority officers about and how to apply the 'Not for Reassessment' process, a key part of the reforms meant to reduce unnecessary reapplications for those with permanent disabilities.

This experience shows that while consultation took place, it lacked substantial participation or co-production, excluding the very people most affected by the policy and failed to reflect the Welsh Government's commitment to the Social Model of Disability.

- **Social Model of Disability:** Genuine inclusion means involving people with lived experience as equal partner, excluding them from meaningful discussion reproduces systemic barriers.
- **Public Sector Equality Duty (Equality Act 2010):** 'Requires public bodies to advance equality of opportunity and involve people with protected characteristics in shaping services that affect them'. Tick box consultation does not meet this standard.
- **Social Services and Well-being (Wales) Act 2014:** 'Embeds voice, choice, and control' for people in designing and receiving support.
- **Well-being of Future Generations (Wales) Act 2015:** Demands 'involvement' as one of its five ways of working, ensuring that people have a real say in decisions that affect their lives.
- **Human Rights Act 1998:** Genuine participation and respect for dignity are core to rights-based policymaking.

Our goal remains to make the process of obtaining a badge efficient, effective and stress-free as possible. I am grateful to both petitioners for highlighting their concerns and their experiences and feedback will continue to be shared as this work progresses.

Ken Skates, states that WG goal is to make the Blue Badge process as '*efficient, effective, and stress-free as possible*', the lived experience of applicants tells a very different story, see below and blue badge survey report

STAND North Wales CIC survey conducted over 25 days, with 636 participants, found that the renewal process caused:

- **Stress** for 77.6% (492 respondents)
- **Loss of independence** for 34.5% (219 respondents)
- **Extra costs** for 22.1% (140 respondents)
- **Isolation** for 19.1% (121 respondents)

These findings clearly show that, for the majority of applicants, the current Blue Badge renewal process is far from stress free. Instead, it is causing significant emotional, financial, and social strain directly contradicting the Welsh Government's stated aims.

Recommendations from the STAND North Wales Blue Badge Survey Report

- A) Introduce a Lifetime Award for individuals with lifelong, non-improving conditions, eliminating the need for reassessment and repeated applications.
- B) Improve Communication and Reminders
- C) Implement an automatic reminder system to inform individuals before their badge expires.
- D) Address Hidden Disabilities
- E) Ensure assessors are appropriately trained to consider a wide range of disabilities, including hidden and non-mobility related disabilities
- F) Reduce Bureaucracy
- G) Streamline the application process and reduce the need for repeated evidence, particularly where a lifelong condition is medically confirmed
- H) Uphold Rights and Dignity
- I) Design policies in line with equality, human rights, and social justice obligations.

Implementing these recommendations would make the Blue Badge process fairer, more efficient, and sustainable, reflecting the Social Model of Disability, which recognises that systemic barriers, not impairments, disable people. A Lifetime Award for individuals with lifelong, non-improving conditions would reduce repeated assessments, saving time and resources for applicants and local authorities. Improved communication, reminders, and assessor training would ensure hidden and cognitive disabilities are properly recognised, enhancing service quality. While

some initial investment would be required, the long-term benefits - reduced costs, fewer complaints, and greater trust, would outweigh these. The changes would remove systemic barriers, uphold dignity, promote equality and inclusion, and ensure disabled people and their carers have equal access to participate in everyday life, aligning the scheme with social justice principles and legal obligations under the Equality Act 2010, PSED, Human Rights Act 1998, Social Services and Well-being (Wales) Act 2014, and Well-being of Future Generations (Wales) Act 2015.

Please find attached:

- Blue Badge Survey Report
- Additional comments and experiences from survey participants (previously submitted)
- Correspondence sent to Ken Skates and Jane Hutt with concerns
- Correspondence from petitioners responding to recommendations and raising questions - many of which remain unanswered