

BB 02

Ymchwiliad i Gynllun y Bathodyn Glas yng Nghymru: Cymhwysra a Gweithredu  
Inquiry into the Blue Badge Scheme in Wales: Eligibility and Implementation

Ymateb gan: Alzheimer's Society Cymru

Response from: Alzheimer's Society Cymru



I am pleased to respond on behalf of Alzheimer's Society Cymru to the [Equality, Local Government & Communities Committee inquiry into the Blue Badge Scheme in Wales: Eligibility and Implementation](#). Alzheimer's Society is the UK's leading dementia charity. We provide information and support, improve care, fund research, and create lasting change for people affected by dementia. Our mission is to transform the landscape of dementia forever. Until the day we find a cure, we will strive to create a society where those affected by dementia are supported and accepted, able to live in their community without fear or prejudice. Alzheimer's Society Cymru welcomes the Committee's interest in the Blue Badge Scheme in Wales.

Alzheimer's Society Cymru is concerned that due to the localised nature of the blue badge scheme and the lack of understanding around dementia, people with dementia may still experience discrimination in accessing blue badges. This is because they are most likely to fall within the discretionary category.

Our experience in Wales is that despite having clearer guidance than the rest of the UK regarding the eligibility of people with non-physical disabilities and which explicitly states that dementia is an example of a cognitive impairment, we have heard from our service users in Wales that getting a blue badge can still be a challenge. Because the decision to award a blue badge is discretionary (unless the person is automatically eligible), there is no consistent approach across local authority areas to assessment criteria or process in place to support people living with dementia who apply for a blue badge. As each case is handled separately, it means that there are huge inconsistencies in the system, and local authorities take a different approach to whether dementia qualifies individuals under these discretionary eligibility criteria. We would therefore call for the Welsh Government to investigate the creation of a statutory baseline assessment criteria and process to ensure that people across Wales get the same basic service.

Therefore, even if the criteria for awarding a blue badge changes, we are still concerned that the localised nature of awarding a blue badge will mean inconsistency in practice for people with dementia. Alongside this there is no legal requirement for local authorities to have an appeals procedure, with appeals being sent instead to the Integrated Transport Unit based in Cathays Park. This process needs to be clear, straightforward and fair, and not in itself a deterrent to applying for a badge. We therefore call on the Welsh Government to ensure that the appeals process is easy to understand and, like the assessment criteria, there is a baseline that the Welsh Government can provide to ensure an equitable service in appeals.

Mae'r Gymdeithas Alzheimer yn elusen gofrestrredig yng Nghymru a Lloegr (296645) ac ar Ynys Manaw (1128)  
Cwmni cyfyngedig gan warant, cofrestrwyd yng Nghymru a Lloegr (2115499) ac ar Ynys Manaw (5730F)  
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Alzheimer's Society is a registered charity in England and Wales (296645) and the Isle of Man (1128)  
A company limited by guarantee, registered in England and Wales (2115499) and the Isle of Man (5730F)  
Registered office: 43-44 Crutched Friars, London EC3N 2AE.

Alzheimer's Society Cymru believes that unless eligibility assessors are specifically trained in dementia, there will be a possibility that people living with dementia may be disadvantaged. Ensuring that assessors have an understanding of dementia and how it affects people is absolutely vital to ensure parity with other conditions, particularly due to the complex nature of dementia. The current process, especially for re-assessment does not consider that dementia is a progressive terminal condition. People living with dementia will not get better and their dementia will continue to advance and have an impact on their life. Each renewal being treated as a new application is distressing for people affected, and shows a lack of understanding about the condition by the criteria, assessment process and assessors. Therefore, we would advocate for all eligibility assessors to be trained to at least level one on the 'Good Work' framework.

People with dementia face significant challenges in accessing blue badges and we would consider it a positive if steps were taken to clarify the scope for people with disabilities where the impact is 'hidden.' Dementia can cause problems with mobility which are not necessarily related to the physical act of walking including difficulties with co-ordination, balance and perception. At the same time, the symptoms of dementia can mean that a person can put themselves at risk whilst out – for example, somebody may become anxious if they are in an unfamiliar place, may get lost or may not appreciate risks around them, such as roads and traffic. Focusing on the importance of the non-physical aspects of walking, as well as the potential risk to safety is important for ensuring that the symptoms of dementia are accurately considered in the context of blue badges. Therefore, we would call for the Welsh Government to consider other factors that can affect mobility, such as co-ordination, balance and perception when refreshing and updating any guidance.

However, although it is positive that amendments to this guidance are being considered by the committee, we are still concerned that due to the localised and discretionary nature of the implementation of the blue badge scheme (where people are not automatically eligible), people with conditions such as dementia will still risk losing out on being awarded a blue badge. Application of these criteria in a way that is fair requires an understanding of the impact that dementia can have on a person's mobility and ability to follow a journey. It also requires consistency in application across local authority areas. Alongside this amendment both the guidance and implementation needs to be considered both with Local Authorities and outsourced partners.

It is clear from engagement with our operations staff and service users that there is inconsistency in the application of the system and guidance, which is subject to huge variation across the country. We are concerned that unless concerted effort is made to improve this consistency, the changes the government is proposing will not go far enough to address the limitations in the blue badge scheme faced by people with dementia. With considerable interest from people affected and a genuine need for this process to be reviewed, it needs to be ensured that further training, awareness and guidance is communicated far and wide to ensure the benefits of these amendments reach the people who need it.

Alzheimer's Society Cymru would also like to see the Welsh Government consider carers in any revision of the guidance and criteria for applying for a blue badge. The current Local Authority guidance (issued in 2017) contains no mention of carers applying for blue badges, either for themselves, or on behalf of the person they care for. We believe that carers should be able to apply for a blue badge where they live in a single car household, with the car registered in their name. This would allow carers to provide a better quality of life for the person being cared for and allow a flexibility of options for the carer and the person being cared for. The 2017 guidance also

makes no mention of allowing carers to apply for a blue badge on behalf of someone they care for. People living with dementia can often find the process of making applications such as these difficult and allowing carers to make the application on their behalf would ensure that more people who are eligible for the badges have the ability to apply for, and access to, the badges. Therefore, we call on the Welsh Government to actively consider carers, and how carers can help those living with dementia in this process when developing and refreshing guidance.

We welcome the Equality, Local Government & Communities Committee inquiry into the Blue Badge Scheme in Wales: Eligibility and Implementation. What we have sought to achieve with this evidential submission is to outline to the committee where there are areas for improvement and to try and offer solutions to these issues. We hope that evidence contained in this document is informative and will help the committee accurately examine the Blue Badge Scheme in Wales.

If you require any other information, please do not hesitate to contact me.

Kind regards