



Down's Syndrome Scotland

helping people realise their potential

Blue Badge Scheme
Transport Policy Directorate
Area 2D North
Victoria Quay
Edinburgh
EH6 6QQ

Friday 6th December 2013

Dear Sir,

Call for Written Evidence – Blue Badge Scheme: Potential Extension to Eligibility Criteria

Down's Syndrome Scotland welcomes the opportunity to respond to this call for evidence from Transport Scotland. As a charity, we work to improve the quality of life for everyone in Scotland with Down's syndrome and their families. Down's syndrome affects approximately 20 per cent of the learning disability population and is the single biggest diagnosed cause of learning disability. Therefore we have a particular interest in the proposed changes to extend eligibility criteria for the Blue Badge Scheme to people with a 'diagnosed mental disorder'.

1. Down's Syndrome Scotland believes that eligibility criteria need to be extended because the issue of mobility alone does not fully encompass the difficulties that people with learning disabilities and their families may encounter in everyday life situations. As noted in the call for evidence, some people with Down's syndrome who can walk may still represent a danger to themselves and to the safety of others because they have little awareness of traffic; currently they do not meet the eligibility criteria for a blue badge because of the mobility criterion. The extension of eligibility criteria would thus recognise that their condition may result in compromising their safety and posing a danger to others too. New eligibility criteria would increase the ability of people with Down's syndrome to access social activities because it would allow their parents/carers to park closer to the venue thus avoiding potentially dangerous situations like crossing the street for example.

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Another concern with current eligibility criteria is the lack of consideration for family circumstances. Down's Syndrome Scotland knows of one family with twin sisters, one of whom has Down's syndrome. When only one parent is caring for the two young girls, it can be very difficult for them to deal with any potential behavioural problem and look after the second child at the same time. Again being able to park closer to a venue would help avoiding situations which could put the lives of children in danger. Down's Syndrome Scotland would thus welcome measures that facilitate parking for parents caring for a child with Down's syndrome where there are other young children in the family also requiring care/supervision. The extension of eligibility criteria would contribute to achieve this since 'parent and child parking spaces' are limited and not always available either.

2. There are currently not enough parking spaces for blue badge holders in certain places; it is therefore highly likely that an extension of eligibility criteria would result in even less available spaces for old and new holders, if availability is not monitored.
3. From the perspective of adults with Down's syndrome, the current definition of 'diagnosed mental disorder' as defined in the Mental Health (Care and Treatment) (Scotland) Act 2003 would be suitable and cover them. However we are of the view that a loophole remains with regard to children. Indeed, children with learning disabilities under 16 will continue to be covered by DLA and not PIP; as a result, relying on the PIP descriptor only to determine eligibility would not cover children with Down's syndrome. We would therefore welcome further clarification on this issue.
4. Should the scheme be extended, the main challenges will be the increase in the number of applications to be processed and the issue of monitoring the use of Blue Badges. As for the latter, we would like to point out that having a learning disability is not always visible by comparison to a physical disability. It might therefore be harder to police and would also likely require more resources.

With regard to identifying eligibility, we would also welcome advice as to whether the assessments for PIP could be used to identify persons eligible for a Blue Badge under the new criteria. This would not only limit the number of assessments individuals with Down's syndrome have to attend but also maximise the use of resources available to deal with more applications.

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We trust these comments assist Transport Scotland with its enquiry. Please do not hesitate to contact our office on 0131 313 7452 or by email at rachel@dsscotland.org.uk should you have any questions.

Yours sincerely,

Rachel Le Noan
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Down's Syndrome Scotland

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