

28 May 2026

Dear

ATISN 26927 – Blue Badge Scheme in Wales Eligibility

Information requested

The following information regarding the Blue Badge Policy Discrepancy: Automatic Entitlement Criteria in Wales vs England:

1. Please confirm the statutory or policy basis for setting the Welsh threshold at 12 points rather than 10.
2. Whether any Equality Impact Assessment was undertaken when this divergence from England was introduced or maintained.
3. Whether the Welsh Government has assessed the practical impact on disabled people who cannot safely or independently plan or follow a journey but fall below the 12-point threshold.
4. Whether the Welsh Government intends to review this policy in light of fairness, consistency, and the Public Sector Equality Duty.

Our response

1. The eligibility criterion for cognitive impairment was introduced in 2014 in Wales. If you have any score other than 12 points under descriptor F, in the 'planning and following journeys' activity of PIP, you may still be eligible for a blue badge, but you do not automatically qualify. Applications are assessed on an individual basis.

Cognitive impairment may include people with autism, alzheimer's or dementia, stroke survivors, learning impairments, mental health difficulties or head injuries although this is not an exhaustive list. However, applicants must be unable to follow the route of a familiar journey without the assistance of another person.

In England the automatic criteria changed later in 2019, to enable those in the mobility component of PIP who are awarded 10 points specifically for descriptor E under the 'planning and following journeys' activity, on the grounds that you are unable to undertake any journey because it would cause you overwhelming psychological distress.

The automatic eligibility for cognitive impairments in Wales for a blue badge aligned PIP awards which DWP phased in from 2013. i.e. Mobility Activity 1, for descriptor f which is the definition within the activity that is awarded to the

‘planning and following a journey, who has the greatest difficulty following any route or journey without another person, assistance dog or orientation aid.’

The UK Government phased in awards following a programme of welfare reform which included replacing the Disability Living Allowance (DLA) with Personal Independence Payments (PIP) for working age people, i.e. 16 – 64 year olds. This directly impacted on the automatic eligibility criteria namely receipt of Higher Rate Mobility Component Disability Living Allowance (HRMCDLA) in that age group.

DWP phased in PIP for new applicants from April 2013 and existing recipients of DLA were assessed for PIP from October 2013. The migration to PIP for working age claimants was planned to be completed by 2017.

In April 2013 regulations were made in Wales to include PIP as Blue Badge eligibility criteria as follows:

- **Mobility Activity 1**, descriptor f or
- **Mobility Activity 2**, descriptors c, d, e or f

Mobility Activity 1 relates to ‘Planning and following a journey’.

Descriptor f, is the definition within the activity that is awarded to a person who has the greatest difficulty following any route or journey without another person, assistance dog or orientation aid.

Mobility Activity 2 relates to ‘Moving around’.

Descriptor c, is the definition within the activity at which a person has difficulty standing and moving, being unable to move more than 50 metres. The other descriptors identify increasing levels of difficulty moving around. This best reflects the criteria at which HRMCDLA has historically been awarded to claimants.

[Written Statement - Blue Badge Scheme \(17 October 2013\) | GOV.WALES](#)

2. An Equality Impact Assessment was not undertaken when the UK Government Department of Transport widened their eligibility criteria to include some hidden impairments in 2019, as Wales had already introduced cognitive eligibility criteria.
3. Yes. Applicants can still be considered for a badge under the further assessment cognitive eligibility criteria route if they are awarded less than 12 points in Wales or chose not to claim benefits. This aligns with the need for a rigorous assessment for those applying to the Department for Work and Pensions for assessment for award of benefits.
4. Welsh Government does not intend to undertake a review of the eligibility criteria at this time.

Next steps

If you are dissatisfied with the Welsh Government’s handling of your request, you can ask for an internal review within 40 working days of the date of this response. Requests for an internal review should be addressed to the Welsh Government’s Freedom of Information Officer at:

Information Rights Unit,
Welsh Government,
Cathays Park,
Cardiff,
CF10 3NQ

or Email: Freedom.ofinformation@gov.wales

Please remember to quote the ATISN reference number above.

You also have the right to complain to the Information Commissioner. The Information Commissioner can be contacted at:

Information Commissioner's Office,
Wycliffe House,
Water Lane,
Wilmslow,
Cheshire,
SK9 5AF.

However, please note that the Commissioner will not normally investigate a complaint until it has been through our own internal review process.

Yours sincerely