

# States of Guernsey disability review: Meeting the needs of disabled islanders

Overarching report

June 2017

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## Executive summary

The States of Guernsey's Disability and Inclusion Strategy contains an action for the States of Guernsey to commission an audit of the States' employment practices, buildings and services to ensure they meet the requirement of new legislation, new policies and plans. The States has commissioned Business Disability Forum (BDF) to assess its current state of preparation for future disability discrimination legislation as both an employer and service provider.

This overarching report for the States of Guernsey, forms part of a series of reports which focus on the extent to which the needs of disabled islanders are currently considered and actively met, in relation to the States many and varied services. The report summarises our findings, compares performance between Committees and explores broad strategic issues that cut across individual service areas.

To this end we:

- Surveyed service area leads from across the States of Guernsey
- Held workshops with service area leads from each Principal Committee and the States' Trading Supervisory Board
- Held a focus group with disabled islanders
- Reviewed publicly available online information about the States' public services.

In summary, our review has identified that some good work already takes place, for example:

- A number of service leads from across the States of Guernsey are already taking a leading role in ensuring that their service area is as accessible as possible to disabled customers.
- Service areas across the States were able to provide examples of anticipating and meeting the needs of disabled customers in a range of settings.
- The States' online disability awareness training is widely known and had been accessed by a significant number of participants in our research. In some cases, this had led to tangible examples of improved practice.
- Some service areas liaise with the Guernsey Disability Alliance in order to understand how services might be improved for disabled customers.

We also identified a number of common challenges across the Committees. Consistent themes included:

- A tension between a genuine desire to improve disability performance and concerns about a lack of resources to invest in specific initiatives.
- The inaccessibility of many of the States' public service buildings.
- Disabled people not being routinely involved in the design and review of services. Where disabled people are involved, there is an over reliance on involving the (relatively small) membership of the GDA.
- The needs of disabled people are not routinely anticipated in relation to the States' various communication channels, particularly in relation to digital communications.
- Where suppliers provide an element of public service, they are not routinely required to demonstrate an understanding and ability to meet the needs of disabled customers.

We have made a number of recommendations arising from our research. We are confident that implementing our recommendations will improve the experience of disabled customers whilst at the same time bringing benefits to the organisation, such as greater efficiency, technological innovation and improved customer satisfaction. In this respect we believe that implementing our recommendations will directly support the States' activities under the Public Sector Reform Framework, especially with regard to improving customer engagement, estates optimisation and making better use of technology.

Key recommendations include:

- Identify an overarching disability champion with responsibility for overseeing systematic improvement of the States' performance as a disability-smart service provider.
- Use information from the recent DisabledGo access audits to build a detailed picture of the accessibility of public service buildings and use this as the basis of a States-wide plan for improving access.
- Develop a mechanism to enable the consistent engagement of a broad range of disabled islanders in order to help the States understand the impact of its activities on disabled customers.
- Allocate funding for improving access for disabled customers from the Public Sector Reform budget when an action is likely to further the aims of both strategies. For example, where recommendations relate to accessible premises or technology.

The strategic action plan set out in Appendix B contains a summary of our recommendations and we suggest that these are taken forward by an implementation group comprising strategic leads working across the broad areas covered in our review.

## Introduction

Business Disability Forum (BDF) is a not for profit membership organisation that makes it easier and more rewarding to employ people with disabilities or long-term injuries or health conditions and to serve disabled customers.

Our members employ almost 20% of the UK workforce and, together, we seek to remove the barriers between public and private organisations and disabled people. We provide pragmatic support by sharing expertise, giving advice, providing training and consultancy and facilitating networking opportunities.

The States of Guernsey's Disability and Inclusion Strategy contains an action for the States of Guernsey to commission an audit of the States' employment practices, buildings and services to ensure they meet the requirement of new legislation, new policies and plans. To this end, the States has commissioned BDF to assess its current state of preparation for future disability discrimination legislation as both an employer and service provider.

This overarching report forms part of a series of reports which focus on the extent to which the needs of disabled islanders are currently considered and actively met in relation to the States many and varied services. The report summarises our findings, compares performance between Committees, and explores broad strategic issues that cut across individual service areas.

### Disability-smart approaches to service provision

Through our experiences of working with hundreds of disability-smart organisations over a period of more than 20 years, BDF has identified a wealth of best practice that now exists in relation to the service of disabled customers.

Key indicators include:

- Organisational values that prioritise improving disability performance
- Improving the skills, confidence and knowledge of customer-facing employees
- Practising inclusive design when developing new services
- Key service channels that are usable and accessible to disabled customers
- Disabled customers can easily request and access adjustments to help overcome the barriers they face
- Gaining insight directly from disabled people
- Disability-related customer complaints are recorded, analysed and responded to.

## Disability legislation

In this project we have explored the States of Guernsey's practice in relation to supporting its disabled staff and customers. The review was prompted by a decision to prepare legislation in the next few years. In our review, and in the absence of a legislative framework, we have used our experience of working with other large organisations, to set out how we believe the States' practice compares to best practice.

Although Guernsey is not a member of the EU and not part of the UK, it is important to note that in many ways the UK and EU's legislative frameworks do significantly (if indirectly) influence ways of working in the States.

For example:

- Airlines operating out of the airport are subject to the Civil Aviation Authority's regulations and the EU Directive on supporting passengers with reduced mobility.
- Guernsey's building regulations mirror those of the UK, including Part M which focuses specifically on the accessibility of buildings

This will mean that even if Guernsey does not develop its own disability discrimination legislation, the expectations of visitors and large employers will be that services will match the same standards.

## Methodology

The methodology was selected to ensure an understanding of the States of Guernsey, its services and general approach to meeting the needs of disabled islanders.

In summary, there were four key phases to this work:

1. A short survey was disseminated to key service leads by Chief Secretaries. The survey was designed to assess, at a high level, the extent to which the needs of disabled customers are considered at an individual service level. Appendix A contains the full survey.

A total of 59 employees responded to the survey.

2. BDF facilitated workshops with service leads from each Principal Committee and the States' Trading Supervisory Board over 21 March and 22 March, 2017. In total, 54 colleagues attended the workshops.
3. A focus group was held with members of the Guernsey Disability Alliance (GDA) in the evening of 21 March, 2017. The primary aim of the focus group was to develop a greater understanding of the GDA's members' views on the key barriers to inclusion relating to the States' various services and how these might be improved.

In addition to this meeting, we also reviewed a GDA summary of key points made by its members in response to the Community Survey and submitted to the States in December 2015.

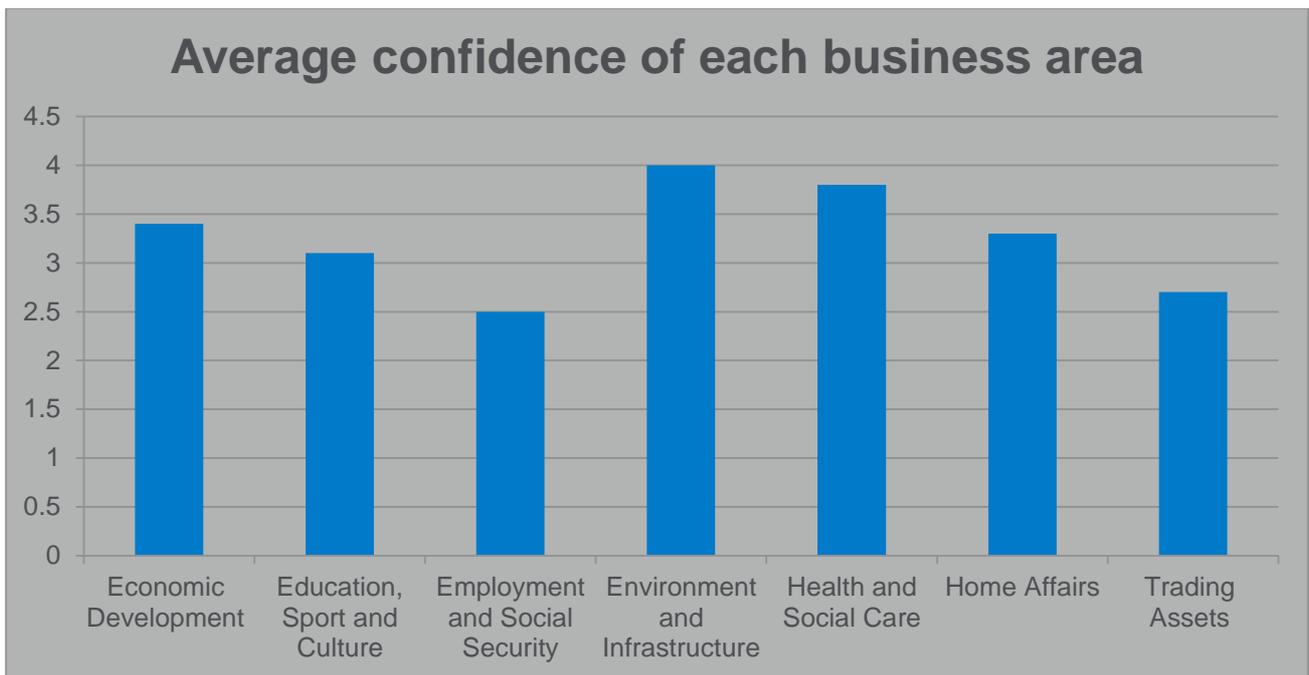
4. A review of customer-related information on the States of Guernsey and Signpost.gg websites and 13 service-specific websites. For a full list of the websites we reviewed see Appendix F.

It should be noted that our methodology was limited in scope and far from exhaustive. In this respect, we were reliant on a small number of individuals to represent the work and activities of large and diverse Committees. We have presented the findings from our research as fairly as we can; highlighting good practice and areas where we think improvements might be made. We hope that each Committee will find the framework of the report and the disability lens we have used in the research to be helpful in supporting them to become disability-smart.

## Analysis of overall disability performance

Survey respondents were asked to rate how confident they were that their service area is currently meeting the needs of disabled customers. The average confidence rating across all Committees and functions was 3.4 out of 5 (where 1 = low confidence and 5 = extremely confident). Individual Committee responses ranged from 2.5 to 4.

**Figure one: overall confidence ratings of each Committee and Trading Supervisory board**



We have developed tailored reports for each Principal Committee and the State’s Trading Supervisory Board which outline good practice and areas for improvement, and include tailored and specific recommendations for service improvement.

The following table summarises our key findings in relation to the good practice and areas for improvement identified for each Committee and the State’s Trading Supervisory Board. What follows is not exhaustive but by way of a snapshot only.

Figure three: Summary of good practice and areas for improvement

Examples of good practice	Examples of areas for improvement
<b>Committee for Economic Development</b>	
<ul style="list-style-type: none"> <li>• Two leads with responsibility for leading improvements for disabled customers were identified by survey respondents.</li> <li>• There is an awareness of the link between ageing and disability and a willingness to make adjustments for older customers within the Guernsey Registry Service.</li> <li>• The Guernsey Tourism Strategic Plan (2015–2025) contains an action to position Guernsey as an accessible tourist destination.</li> <li>• Work is underway to improve the accessibility of the Guernsey Information Centre</li> </ul>	<ul style="list-style-type: none"> <li>• Three out of five survey respondents said they did not ensure that external communication methods are as inclusive and accessible as possible to disabled service users.</li> <li>• The experiences of disabled customers do not routinely inform service design and delivery.</li> </ul>
<b>Committee for Education, Sport and Culture</b>	
<ul style="list-style-type: none"> <li>• Guernsey Museums and Galleries have developed a public commitment to improving access for disabled customers.</li> <li>• The Beau Sejour Leisure Centre liaised with the local disabled swimming group when redeveloping the swimming pool.</li> <li>• All schools undertake Inclusion and Equality reviews.</li> </ul>	<ul style="list-style-type: none"> <li>• A tension was noted between a genuine desire to provide inclusive services and a lack of resources to do so to a satisfactory level.</li> <li>• Suppliers that provide an element of public service are not routinely required to demonstrate an understanding and ability to meet the needs of disabled customers.</li> <li>• Four out of seven survey respondents indicated that they did not ensure that external communication methods are as inclusive and accessible as possible to disabled service users.</li> </ul>

Examples of good practice	Examples of area for improvement
<b>Committee for Employment and Social Security</b>	
<ul style="list-style-type: none"> <li>• Staff reported having receiving training on dementia</li> <li>• Employees within Social Security are happy to work with those supporting an individual claimant such as family members of advocates.</li> </ul>	<ul style="list-style-type: none"> <li>• Suppliers are not routinely required to demonstrate the ‘disability competence’ required in order to meet the needs of any disabled customers with whom they interact.</li> <li>• Disabled people are not routinely consulted in order to understand their experiences of the Committee’s services.</li> <li>• Disabled customers identified the tone and accessibility of letters sent by Social Security and Housing (among other service areas) as being a barrier to effectively engaging with the States of Guernsey.</li> </ul>
<b>Committee for Environment and Infrastructure</b>	
<ul style="list-style-type: none"> <li>• The Highways and Traffic Service has disability-related plans and resources have been allocated to facilitate implementation.</li> <li>• Disabled Islanders are provided with guidance relating to transport. For example, the document ‘Transport for People with Disabilities’ covers areas such as: accessibility of buses, taxis, parking, and issues relating to either returning to or learning to drive<sup>1</sup>.</li> </ul>	<ul style="list-style-type: none"> <li>• The Committee currently has no named leads with responsibility for driving improvement in the service of disabled customers.</li> <li>• There is an opportunity to expand the Committee’s efforts to involve disabled islanders when designing or reviewing services so that disabled people who are not GDA members are consulted.</li> </ul>

<sup>1</sup> <https://www.gov.gg/CHttpHandler.ashx?id=101710&p=0>

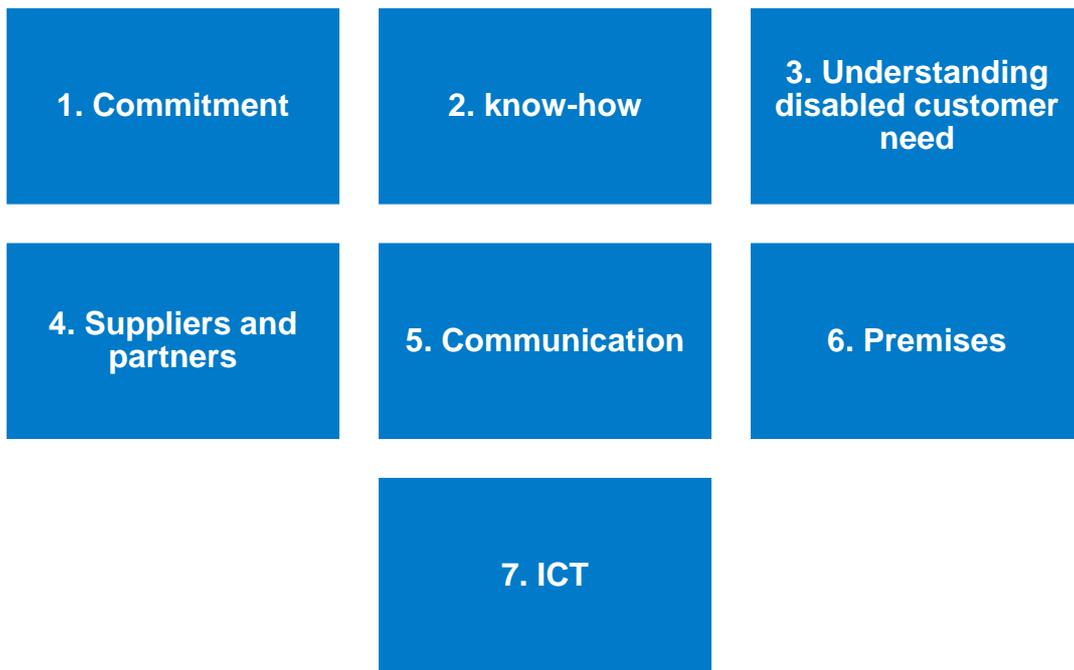
Examples of good practice	Examples of area for improvement
<ul style="list-style-type: none"> <li>• The Guernsey Disability Alliance (GDA) has been involved in service design.</li> <li>• Disabled islanders and visitors can use accessible buses and taxis.</li> </ul>	
<b>Committee for Health and Social Care</b>	
<ul style="list-style-type: none"> <li>• Ward staff at the Princess Elizabeth Hospital Guernsey received training from the Hard of Hearing Association in order to improve communication between staff and patients who are deaf or hard of hearing.</li> <li>• Service users with mental health conditions were involved in the design of the new mental health ward.</li> <li>• A number of disability-related initiatives have been implemented for disabled hospital patients, including a disability passport which documents the needs and preferences of individual disabled patients.</li> </ul>	<ul style="list-style-type: none"> <li>• Workshop participants indicated that the complaints procedure may be inaccessible, making it especially difficult for service users with a learning disability to raise concerns.</li> <li>• It was reported that some elements of some buildings, including care homes, were not completely accessible to disabled service users.</li> </ul>
<b>Committee for Home Affairs</b>	
<ul style="list-style-type: none"> <li>• Survey respondents identified that a number of colleagues take a leading role in ensuring that their services areas are accessible to disabled customers.</li> <li>• The Prison Service has a Diversity Strategy (which includes disability) and two members of staff have a specific remit for diversity issues as part of their overall roles.</li> </ul>	<ul style="list-style-type: none"> <li>• Disabled people are not routinely involved in the design or review of services in order to ensure that they are accessible.</li> <li>• The extent to which external communication methods are made inclusive and accessible as possible to disabled service users appears inconsistent.</li> </ul>

Examples of good practice	Examples of area for improvement
<ul style="list-style-type: none"> <li>• The Fire and Rescue Service has trained Health Visitors to identify potential fire risks when they visit disabled or older residents and to make referrals (with the resident’s consent) for a fire safety check.</li> <li>• The Royal Court of Guernsey’s website contains information about the accessibility of the building and invites disabled islanders to request assistance.</li> </ul>	<ul style="list-style-type: none"> <li>• Three out of five survey respondents indicated that ICT is not inclusive and accessible to disabled service users.</li> </ul>
States’ Trading Supervisory Board	
<ul style="list-style-type: none"> <li>• When supporting other Committees with capital construction projects, Property Services will work with them to ensure that proper consideration has been given to accessibility within plans.</li> <li>• Airport and Harbour staff have liaised with the Guernsey Disability Alliance in order to improve service provision and undertaken disability-related training.</li> <li>• Guernsey Water have given thought to meeting the needs of ‘vulnerable’ customers including those with disabilities.</li> </ul>	<ul style="list-style-type: none"> <li>• Few services have nominated leads who have responsibility for improving disability performance and there are a lack of specific plans aimed at improving provision for disabled customers.</li> <li>• Suppliers that provide an element of public service are not routinely required to demonstrate an understanding and ability to meet the needs of disabled customers.</li> <li>• Some facilities were reported to be challenging with regard to access and, in one instance, inaccessible to disabled customers.</li> <li>• The communication needs and preferences of disabled customers are not routinely anticipated or accommodated.</li> </ul>

## Analysis of disability performance in key areas

To facilitate an understanding of the good practice already underway and where practice might be improved we have grouped our analysis under key themes explored in both the survey and workshops. These cover commitment, knowledge and skills of key colleagues, understanding the needs of disabled customers, suppliers and partners, communication, premises and Information and Communication Technology (ICT).

**Figure two: structure of our analysis**



## 1. Commitment

**Disability-smart service providers are committed to providing (or aspiring to provide) excellent service to disabled customers.**

Our review identified that some service areas have developed their own public commitment to inclusion and diversity or meeting the needs of disabled specifically. For example:

- The Guernsey Fire & Rescue Service's Operating Plan for 2017 includes a public commitment to delivering an inclusion service:  
'We value diversity in the Service and the community by treating everyone fairly and with respect, providing varying solutions for different needs and expectations, promoting equal opportunities in employment and progression within the Service and challenging prejudice and discrimination'<sup>2</sup>
- The Guernsey Museums and Galleries' website contains the following commitment:  
'Guernsey Museums and Galleries is committed to making its sites as accessible and inclusive as possible for all users. We strive to remove any barriers to access whether physical, emotional, cultural, financial or otherwise'<sup>3</sup>.

This is good practice and we recommend that every service area develop its own public commitment to meeting the needs of disabled and older islanders.

In addition to developing commitments at individual service level, we recommend that the States develop its own overarching commitment to becoming a 'disability-smart' service provider. The State's might be interested to learn from BDF members in the private sector in this regard. For example:

- Sainsbury's has publicly committed to becoming: 'the most inclusive retailer where people love to work and shop'<sup>4</sup>.
- Barclays aims: 'to become the most accessible and inclusive FTSE company for all our customers, clients and colleagues'<sup>5</sup>.

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<sup>2</sup> <https://www.gov.gg/CHttpHandler.ashx?id=107234&p=0> (accessed 07/05/17)

<sup>3</sup> <http://www.museums.gov.gg/CHttpHandler.ashx?id=90463&p=0> (accessed 07/05/17)

<sup>4</sup> <http://sainsburys.jobs/information/diversity>

<sup>5</sup> <https://www.home.barclays/about-barclays/diversity-and-inclusion/disability.html>

In addition to developing this specific commitment, we also recommend that the States review existing plans to identify where a focus on disability might be included. For example, the States commitment under the Disability and Inclusion Strategy to measure and improve its performance as a service provider is directly relevant to the States wider public sector reform work. This is directly relevant because, in the experience of BDF's membership, improving disability confidence is a catalyst for greater efficiency, technological innovation and improved customer satisfaction.

A review of the Framework for Public Sector Reform<sup>6</sup> identified that the 'Proud to Serve' initiative will: 'set out customer service standards for the public service' and: 'make customer service excellence the norm by making the needs of the customers the primary focus'. This is an example of where a commitment to providing services that are accessible to disabled and older Islanders complements an existing priority. We recommend that providing an accessible service is a key pillar of 'Proud to Serve' and any associated or similar initiatives.

## Senior leadership

In BDF's experience, the most disability-smart organisations can demonstrate that a commitment to improve disability performance for disabled customers is backed by a mandate from the organisation's senior leadership. In addition, it has also proved effective to identify a senior sponsor for the organisation's work to improve provision for disabled customers.

It is clear from our research that this is an area that could benefit from greater focus. In our reports to each Committee, we have recommended that leads are identified for meeting the specific needs of disabled islanders at an individual service area level. To enable service area leads to begin to measure and improve disability performance in a targeted and consistent way, we recommend that they use the audit and action planning tool that we have developed in Appendix C.

In addition, we also recommend that an overarching lead with responsibility for overseeing improvement in service provision for all of the States' services is identified. We recommend that this responsibility is assumed by the owner of the customer service elements of the Framework for Public Sector Reform.

One workshop participant suggested each Principal Committee should have a named disability champion. This is a recommendation that we would support and we suggest that each Committee champion is required to report on progress to improve the accessibility of their service areas.

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<sup>6</sup> <https://www.gov.gg/CHttpHandler.ashx?id=97310&p=0> (accessed 15/05/17)

## Disability-related plans or strategy

In BDF's experience, in the most disability-smart organisations, key stakeholders within the organisation are formally responsible for delivering against a plan or strategy to improve the accessibility of services and are measured on their performance. Although our review identified that some service areas such as the Traffic and Highways, Education and Prison services do have disability-related plans, many other service areas do not.

Given the strategic importance of the Disability and Inclusion Strategy to the States of Guernsey, we have recommended that every service area develops specific plans or amends existing plans to include actions relating to improving provision for disabled customers. Service area leads might find the audit and action planning tool in Appendix C a useful means of identifying actions.

On 27 June, the States will debate the six Principal Committee's policy plans<sup>7</sup> which set out the actions they intend to pursue over the short and medium term to fulfil the objectives agreed in phase one of the Policy and Resource plan (which included a commitment to prioritise, resource and implement social policy initiatives such as disability and inclusion). We hope that the debate will include scrutiny of each Committee's plans for meeting the needs of disabled Islanders and that where disability-related priorities are identified that these will be adequately resourced.

We also recommend that customer-related plans under the Framework for Public Sector Reform agenda are also reviewed to ensure that, where relevant, they contain specific actions to improve provision for disabled islanders. Specific elements of the Framework where disability is particularly relevant include:

- **Improving customer engagement and satisfaction.** For example, by ensuring that disabled islanders are routinely involved in policy and service design and review.
  - **SMART Guernsey.** For example ensuring that work to bring services online and make better use of technology includes a focus on meeting the access needs of disabled users.
  - **Estates optimisation.** For example, by ensuring that work to ensure the best possible customer access includes meeting the access needs of disabled islanders.
- Innovation and continuous improvement.** For example, by cultivating and exploiting ideas for disability-related improvement by sharing good practice between Committees and learning from leading organisations from within BDF's membership.

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<sup>7</sup> <https://www.gov.gg/article/160174/Policy--Resource-Plan---Phase-Two>

The value of sharing good practice internally was highlighted in feedback from the BDF workshop participants which indicated that:

- Over 70% of participants learned about developments in other service areas
- Nearly 60% made useful contacts to share good practice
- Over 70% said that workshops generated ideas about improving customer services.

In light of this, we recommend that the States explore ways of providing opportunities for service leads from across the organisation to share challenges and good practice. This might include:

- Developing case studies and promoting these via internal communications.
- Holding events focused on improving customer service for disabled islanders that are open to service leads from across the States.
- Ensuring that communications and events relating to customer service more broadly, include a focus on meeting the needs of customers with disabilities.

## **Resources**

A consistent theme from our work across the Committees was a tension between a genuine desire to improve disability performance and concerns about a lack of resources to invest in specific initiatives. Undertaking a consistent approach to measuring disability performance and prioritising actions (using the tool in Appendix C) will provide the States with a firm evidence base and foundation on which to discuss resource allocation. This will also help to foster a transparent approach to sharing the challenges with stakeholders.

During our research a number of employees suggested that, given the link between improving accessibility for disabled customers and improving services for all customers, some funding for the customer service elements of the Framework for Public Sector Reform might usefully be allocated to disability-related initiatives.

**Key recommendations for the overarching Disability Action Plan: Commitment**

- Develop a public organisational commitment to meeting the needs of disabled and older islanders.
- Review existing organisational priorities such as the Framework for Public Sector Reform to identify where a focus on disability might be included. For example, by ensuring that providing an accessible service to disabled customers is a key pillar of 'Proud to Serve' and any associated or similar initiatives
- Identify an overarching champion to oversee the States' work to improve service to disabled customers
- Identify a disability Champion for each Principal Committee and require them to regularly report on progress with regard to improving the accessibility of their front line services.
- Review customer-service related plans under the Framework for Public Sector Reform to ensure that they include actions to improve the experiences of disabled customers.
- Explore ways of providing opportunities for service leads from across the organisation to share challenges and good practice with regard to improving disability performance.
- Ensure that where disability-related priorities are identified by Committees, that these are adequately resourced.

## 2. Know-how

**Disability-smart service providers have a framework and supporting materials to ensure that customer-facing colleagues understand the needs of disabled customers and are able to respond to those needs.**

During a focus group with members of the Guernsey Disability Alliance (GDA), participants reported that, in their experiences, the States' frontline employees were generally friendly and approachable. This is positive although participants did note that they felt that staff are generally less confident when supporting customers with non-visible disabilities. This was supported by feedback from employees from across the States who reported a historical focus on meeting the needs of customers with mobility impairments, over those with non-visible conditions such as dementia, autism and mental ill-health (although a number of participants reported that initiatives focused on these conditions were underway).

A number of workshop participants reported having undertaken the States' online disability awareness training<sup>8</sup>. A representative from the Fire and Rescue Service reported that the training had been mandated in their department and that behaviours had changed as a result. For example, it was reported that colleagues responsible for producing the staff survey ensured that alternative formats of the survey were made available.

### Training needs of customer facing employees

Our review has included a focus on identifying the training needs of key employees including: HR, line managers and frontline service staff.

We have identified three key areas where training would be beneficial and we would be happy to explore with relevant leads from the States of Guernsey how we might support in the provision of content or training to further the confidence and knowledge of customer facing employees:

#### 1. Existing customer-related training

Our review identified that employees have access to existing training on customer services. In order to position meeting the needs of disabled customers as 'business as usual', we recommend that existing training is reviewed to ensure that where relevant, it contains guidance on meeting the needs of disabled customers.

For example, a review of the Public Sector Reform Framework identified an action to 'provide customer service training across the organisation by Q2 2017'. We would be happy to develop disability content for this training as part of our commitment to provide customer-related training following on from our review.

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<sup>8</sup> <https://training.disabledgo.com/auth/register/states-of-guernsey>

## 2. General disability awareness

Our review has identified varying levels of disability awareness among colleagues working across the organisation. As discussed, the States has already developed general online disability awareness training, which includes a module on practical advice aimed at customer-facing staff. We recommend that the States continue to promote the training to all customer-focused employees.

Our review has identified the need for general guidance on:

- What is a disability (including focus on non-visible disability)
- Why meeting the needs of disabled customers is important (with specific reference to priority work streams such as the Disability and Inclusion and Supported Living and Ageing Well strategies and Service Guernsey.
- Recognising when a customer might need you to do something different as a result of a disability when accessing different service channels e.g. face to face, phone and online.
- How to make adjustments and deciding what is reasonable.

As part of our commitment to provide customer-related training following on from our review, we would be happy to explore with relevant leads whether we might develop short written guidance or training (for example, a webinar or podcast) aimed at equipping frontline service staff with a high level awareness of the issues outlined above.

## 3. Addressing the disability component of specific roles

Our review identified that colleagues will have specific disability-related knowledge requirements depending on the nature of their job role. For example, the knowledge required by someone working in the Education's Estates team, will differ from someone welcoming tourists in the Guernsey Information Centre. Positive examples of specific training that has already been provided included:

- Ward staff at the Princess Elizabeth Hospital Guernsey received training from the Hard of Hearing Association to improve communication between staff and individuals who are deaf or hard of hearing.
- Access audit training with the Centre for Accessible Environments (UK) has been carried out with Facilities leads from across the States to raise awareness of accessibility when making changes or developing premises.

In order to build on these positive examples, the States might consider commissioning subject-specific training for relevant leads from across the organisation. Our review has identified that the following course would be beneficial:

- **Disability-smart service design:** Includes a focus on analysing the disabled customer journey, identifying and removing barriers and learning directly from disabled customers.
- **Disability Smart call handling:** Includes a focus on recognising when a caller might have a disability and require additional support.
- **Producing accessible information:** Includes a focus on applying good practice guidelines when producing printed and virtual communications and providing alternative formats.

**Key recommendations for the overarching Disability Action Plan: Know How**

- Continue to promote the States' online disability awareness training to all customer-focused employees.
- Work with BDF to agree how we might best support in the development of training and guidance for customer focused employees.

### 3. Understanding the needs of disabled customers

**Disability-smart service providers anticipate the needs of disabled customers and consult with disabled people and representative organisations to ensure that their needs are understood and accommodated when designing new products, services and processes**

Anticipating the needs of customers and engaging effectively to better understand their needs, is a key consideration under the customer service elements of the Public Sector Reform Framework. The Framework contains commitments to:

- Have a clear understanding of our customers and their needs and expectations
- Understand and respect the differences among customers
- Ensure we engage our customers in the design and improvement of services
- Focus on our customers' priorities.

Our review identified that the extent to which the needs of disabled customers are anticipated varies between services. A common challenge identified across Committees was a lack of clarity about what (if any) disability-related data exists to help inform their service planning. For example, one workshop participant noted a need to: 'design services based on evidence and statistics rather than on ad hoc media driven requests'.

We would recommend that the States' reviews the demographic data it holds on disability and consider whether it can be repurposed to inform each Principal Committee's service planning processes.

A number of workshop participants highlighted the need to ensure that the impact of policies, processes and key decisions on disabled customers (and other groups) was fully understood. Our review did not identify a consistent approach to Equality Impact Assessment (EIA) in relation to service provision. The UK's Equality and Rights Commission explains that a robust approach to EIAs can:

- **ensure that your decisions impact in a fair way:** where there is evidence that particular groups will be negatively affected by a decision, action should be taken to address this.
- **make your decisions based on evidence:** EIA provides a clear and structured way to collect, assess and put forward relevant evidence.
- **make decision-making more transparent:** a process which involves those affected by the policy and which is based on evidence is much more open and transparent. This is more likely to engender trust in decision-makers and in your decisions.

- **provide a platform for partnership working:** EIA offers an opportunity for organisations to work in partnership to consider the impact on members of their shared communities and how they might best collaborate and co-ordinate financial decisions<sup>9</sup>.

BDF works with a number of public sector organisations for which EIA forms an integral part of the decision making process and we recommend that the States develop a consistent approach to carrying out EIA in order to fully consider the potential impact of its activities on its disabled customers.

## Involving disabled customers in service design and review

Key to understanding disabled customers' needs is involving them in service design and review. Our review identified that this happens inconsistently across the State's various service areas.

Where service areas had worked with disabled people, the majority had liaised with the GDA. This is positive practice and participants at a focus group for the GDA welcomed being consulted and noted that the States (and in particular the Disability Officer) had recently made considerable effort to engage with them.

Members of the GDA did however send a clear message that the States should consider using a broader range of disabled people in their consultation processes. Continuing to use the GDA as the primary source of engagement places a heavy burden on a few individuals and does not create the depth and range of experience that the States should be accessing. Full consultation and working towards co-production with disabled people should not be an afterthought, but should be planned and appropriate engagement achieved regularly and in a timely way.

## Supporting advocacy

Participants from a number of services areas across the States reported that they had found it useful to work with disabled people and their advocates. Many participants reported however, that the availability of advocates had diminished over time. For example, it was reported that an advocacy service for people with learning disabilities no longer exists.

A lack of advocacy was also highlighted as a key gap during a focus group with GDA members. One GDA member commented that 'there is now very little advocacy, only volunteers'. The participant also noted that in the past, advocates would have acted as a source of intelligence to the States of Guernsey regarding the needs of disabled customers. This was noted particularly in relation to the needs of those with Alzheimer's

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<sup>9</sup> <https://www.equalityhumanrights.com/en/advice-and-guidance/equality-impact-assessments>

(particularly in care homes). Workshop participants from the Committee for Health and Social Care also suggested that the third sector might be supported to play a more prominent role with regard to providing advocacy.

### **Monitoring complaints**

In addition to involving disabled customers in service design and review, leading BDF members also review complaints to assess whether any are disability-related. We recommend that relevant service areas adopt this practice, and would also recommend that any central complaints process is reviewed to ensure that disability-related complaints are captured. Where disability-related complaints are identified, these should feed directly in to service improvement plans.

#### **Key recommendations for the overarching Disability Action Plan: Understanding the needs of disabled customers**

- Review centrally held demographic data to assess where it might be used to aid Committee's service planning.
- Develop a consistent approach to Equality Impact Assessment that ensures the needs of disabled islanders are always considered in relation to key customer-related policies and procedures.
- Develop a consistent approach to consulting with a broad range of disabled customers (not only the GDA).
- Explore ways to better support disability advocacy in Guernsey.
- Review customer complaints about services that are delivered directly to the public to assess whether any are disability-related. Where complaints are received, ensure that these feed directly into service improvement.

## 4. Suppliers and Partners

**Disability-smart organisations ensure that when elements of customer service are delivered by a third party supplier, suppliers are required to demonstrate an understanding and ability to meet the needs of disabled customers.**

Our review identified that a number of third parties are involved in delivering elements of services to the public on the States' behalf, for example:

- Café staff working in schools
- Travel agents
- Security guards
- St. John's Ambulance
- Maintenance workers for housing tenants

Where suppliers were identified, we found that very few were required to demonstrate an ability to meet the needs of disabled customers. This is potentially risky to the States because while outsourced elements of service delivery fall outside the organisation, the legal, reputational and financial risks of poor disability practice do not.

We recommend that Committees review the extent to which elements of services are outsourced. In addition, we recommend that the States' review its central procurement processes to ensure that they enable a disability-smart approach to working with suppliers. As a minimum, where suppliers are identified as providing an element of public service on the States' behalf, they should be able to demonstrate that they are at least working towards improving their own disability performance.

BDF advocates a step by step approach to working with suppliers and partners which involves addressing disability requirements at the following stages of the procurement cycle:

- a) Governance and expectations
- b) Defining the business need
- c) Developing the procurement strategy
- d) Supplier selection and evaluation
- e) Contract award and management

We would be happy to share our detailed guidance on disability-smart approaches to working with suppliers and partners with the States' procurement leads.

**Key recommendations for the overarching Disability Action Plan: Suppliers and Partners**

- Ensure that the States' procurement leads review BDF's best practice guidance on disability-smart approaches to working with suppliers and partners.
- As a minimum, where elements of a service is delivered by a third party, liaise with the supplier to confirm that they are at least working towards improving disability performance.
- Ensure that when awarding new contracts which contain an element of service provision, suppliers are required to demonstrate an understanding and ability to meet the needs of disabled customers.

## 5. Communication

**Disability-smart service providers ensure that when they communicate with disabled customers, they are as inclusive as possible and whenever necessary they make adjustments to accommodate the communication preferences of individuals**

We found evidence of a need to improve in the area of communications. For example, 55% of all survey respondents indicated that they did not routinely ensure that communications are accessible to disabled customers. Our review identified examples of good practice and areas for improvement in the following areas:

### Websites

In order to enable ease of use by users with visual impairments and other disabilities, websites should be built to recognised standards of accessibility (specifically, the Web Content Accessibility Guidelines<sup>10</sup>). Where websites have been designed to such standards, it is common practice to reference this on the site. An example can be found on the Guernsey.gg site which contains the following statement:

‘This website conforms to level double-A of the World Wide Web Consortium (W3C) Web Content Accessibility Guidelines 2.0. These guidelines explain how to make web content more accessible for disabled people and make the web more user-friendly for all.’<sup>11</sup>

This is positive practice and although no one reported to us that the site is technically inaccessible to disabled users, a number of disabled focus group and States’ workshop participants commented that the site was difficult to navigate. This is also acknowledged in the Public Sector Reform Framework which acknowledges that ‘half of the people who answered the community survey have said they can’t find the information easily on the website’.

We recommend that any improvements to the main site undertaken as part of the Smart Guernsey initiative, include a review of not only accessibility, but also usability, as it relates to the experiences of disabled users. Usability considers how users with particular disabilities interact with the product in practice. It is entirely possible for a product to be ‘accessible’ in terms of the W3C standard, but in practice very difficult for a disabled user, so usability testing by a panel of disabled people determines the practical usability of the product. BDF would be happy to support via our Access Pathway service, a 3-step process designed to ensure that websites and mobile applications meet best-practice and international standards for accessibility<sup>12</sup>.

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<sup>10</sup> <http://www.w3.org/TR/WCAG20/>

<sup>11</sup> <https://www.gov.gg/article/119688/Accessibility>

<sup>12</sup> <http://www.businessdisabilityforum.org.uk/our-services/access-pathway/>

Although, disabled focus group members were critical of the usability of the States' main site, they did acknowledge that disability-specific information was now much easier to find since the introduction of the Signpost.gg website which aims to act as a 'one stop shop' for disability related information for disabled islanders and carers<sup>13</sup>.

### Service-specific websites

Our review also identified that some services have their own websites. A technical audit of the States' various customer-facing websites is outside the remit of our work; however a high level review of a number of sites identified that references to accessibility were rare.

A positive example can be found on the Visit Guernsey website which contains the following statement:

'Visit Guernsey is committed to ensuring that its website is accessible to everyone, including people with disabilities. Accessibility guidelines have been an integral part of the design and development process from the outset. We have taken all steps possible to make sure this website is accessible to all'<sup>14</sup>.

No such references were found on the following sites:

- Guernsey Registry - [www.guernseyregistry.com](http://www.guernseyregistry.com)
- Guernsey Police - <http://www.guernsey.police.uk>
- The Royal Court of Guernsey - <http://www.guernseyroyalcourt.gg>
- Guernsey Museums and Galleries - [www.museums.gov.gg](http://www.museums.gov.gg)
- Beau Sejour Leisure Centre - <http://beausejour.gg/>
- Health and Safety Executive - [www.hse.gg](http://www.hse.gg)
- Guernsey Buses - <http://buses.gg/>
- Children Law - <http://childrenlaw.gg/>
- Guernsey Airport - <https://www.airport.gg/>
- Guernsey Water - <http://www.water.gg/>
- Guernsey Dairy - <http://www.guernseydairy.com/>
- Guernsey Harbours - <http://www.harbours.gg/>

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<sup>14</sup> <http://www.visitguernsey.com/content/accessibility> (accessed 14/04/17)

We have recommended that each Committee review its websites to either confirm that they have been designed to be accessible, or commission an audit to identify how accessibility and usability might be improved for disabled users. It is advisable that the States' communication leads maintain an overview of this work and that resources are allocated to making improvements where necessary.

## Virtual communications

The way that an organisation uses virtual communications such as social media or video content can exclude some disabled customers. For example, many organisations present key information in videos which can disadvantage customers with a hearing impairment if they are not subtitled.

During a focus group with the GDA, a participant with a disability commented that: "there is very little evidence that social media is being used by the States". Our review identified that in addition to the States of Guernsey's main page, the Guernsey Police, Fire and Rescue Service and the Highways and Traffic Service have active Facebook pages which provide islanders with important updates. This is positive practice and we have encouraged employees with responsibility for the pages to consider the accessibility of their social media content.

For example, it is important that nothing is conveyed in a post using an image alone as users with a visual impairment will be unable to access the information using screen reader technology which reads out written information. A high level review of the Fire and Rescue Service's Facebook feed identified an example of information regarding how to request a carbon monoxide tester uploaded as an image without any supporting explanatory text<sup>15</sup>.

We recommend that the States' communication leads source, or develop, guidance on disability-smart approaches to social media, and that this is disseminated to communication leads across the States' service areas.

## Contact provision

As a minimum, customers should be offered a range of contact methods and we were pleased to note that customers using the Guernsey.gg site who have queries relating to the States' services are invited to either fill out an online form, phone, email or visit in person. We also noticed that the contact pages for Social Security<sup>16</sup> and Agriculture,

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<sup>15</sup>

<https://www.facebook.com/GuernseyFireAndRescueService/photos/pcb.996510287117500/996509993784196/?type=3&theater> (accessed 05/05/17)

<sup>16</sup> <https://www.gov.gg/article/135138/Contact-Us---Social-Security> (accessed 01/05/17)

Countryside and Land Management Services<sup>17</sup> included a link to more detailed information (via the DisabledGo website) about the accessibility of their offices. This is excellent practice that we recommend other service areas replicate.

We recommend that the States review its central contact provision to ensure that it enables ease of access for disabled islanders. This means that:

- Call routing should be as accessible as possible. Call routing options can prevent some disabled callers from accessing services via the phone. For example, if the system does not default to an operator if no option is chosen from a menu<sup>18</sup>.
- Callers should be offered a range of contact options.
- Call handlers should be trained to ensure they are confident and knowledgeable when handling calls from disabled callers.

### Alternative formats and 'Tell us once'

It is good practice to provide materials in alternative formats when a disabled customer requests them (and it is reasonable to do so). Alternative formats include large print, easy read, electronic, audio and Braille. It is advisable that the States review its provision to ensure that disabled customers can request alternative formats to centrally produced documents. In addition, States' communication leads might also review its guidance to ensure that service areas leads also have up to date guidance on how to provide alternative formats. BDF would be happy to share its guidance on producing alternative formats to with relevant leads.

Whenever BDF reviews an organisation's contact provision, one of the most common complaints we hear from disabled customers is that they are repeatedly required to explain their circumstances or request adjustments (such as communication via a specific channel or information in a particular format) to different customer service agents.

A number of BDF members, especially those in the retail banking sector, have undertaken work to ensure that systems are better able to capture practical information about disabled customers' needs and preferences (not sensitive data about their medical diagnosis), and we recommend that that the States of Guernsey undertake a similar piece of work. This is especially relevant because:

- A disabled focus group participant commented that: "sometimes people are asked what their preferred communication channel is, but then this is disregarded anyway".

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<sup>17</sup> <https://www.gov.gg/article/153511/Contact-Us---Agriculture-Countryside-and-Land-Management-Services> (accessed 01/05/17)

<sup>18</sup> BDF can provide the States with a briefing 'Top tips for disability-smart call handling'

- The Public Sector Reform Framework states that: ‘Guernsey’s public service will be one of the first public service providers to truly implement a ‘Tell Us Once’ approach’ which will ‘not only help to increase customer satisfaction but also reduce the costs incurred by duplication of effort’.
- Although the stated focus of this initiative is to enable customers to inform the States of events such as a birth or a death, a change of address or a new employer, we recommend that relevant leads explore whether there is scope to ensure that practical information about disabled customers’ communication needs and preferences could also be included.

### Hard copy information

Brochures, forms and other documents can disadvantage disabled users if information is overly complicated and accessible design guidelines are not followed. Our review identified that although some participants are aware of central guidance on producing accessible information, these are not consistently followed. Appendix D contains a checklist for producing accessible information that the States’ central communication leads might like to review and, if necessary, disseminate in order to support service area leads to ensure that materials meet minimum standards of accessibility.

A number of disabled focus group and Committee service leads suggested that many forms are not accessible. Participants at a focus group for disabled islanders also highlighted the general tone of the States’ written communications as a barrier to engaging with the States. One participant suggested that the tone of some letters is: ‘brutal, harsh and not personalised’. It was noted that letters and forms frequently use jargon and tend to: ‘always assume the worst of the recipient’. When asked for examples, the following areas were noted as needing to improve: Social Security, Housing, Right to Work and Income Tax. Correspondence relating to Traffic and Social Care was felt by some participants to have improved a little.

We were pleased to learn from a review of the Disability and Inclusion Strategy Project Highlight Report (No 5) that an initial scoping exercise around documentation produced for customers at the Income Tax Service is underway<sup>19</sup>. We hope that learning from this exercise is shared with other services leads from across the States.

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<sup>19</sup> <http://www.signpost.gg/CHttpHandler.ashx?id=107652&p=0>

### **Key recommendations for the overarching Disability Action Plan: Communication**

- Ensure that any improvements to the main guernsey.gg site undertaken as part of the Smart Guernsey initiative include a review of not only accessibility but also usability as it relates to the experiences of disabled users.
- Ensure that the States' communication leads maintain an overview of work to ensure the accessibility and usability of the States various service-related websites, and that resources are allocated to making improvements where necessary.
- Source or develop guidance on disability-smart approaches to using social media and ensure that this is disseminated to communication leads across the States' service areas.
- Review central contact provision to ensure that it enables ease of access for disabled islanders.
- Review processes to ensure that disabled customers can request alternative formats to centrally produced information.
- Review central communications guidance to ensure that service areas leads have up to date guidance on how to produce accessible information and provide alternative formats when necessary.
- Review processes for capturing practical information about disabled customers' communication needs and preferences. Explore whether this can be undertaken as an enhancement to the 'Tell us once' project.
- Ensure that learning from the review of documentation produced by the Income Tax service is disseminated to other service areas.

## 6. Premises

**Disability-smart organisations ensure that their premises are accessible to customers with disabilities and whenever necessary they make adjustments for individuals.**

The accessibility of the States' buildings was raised as a concern in nearly all of our interactions with Committee service leads. Despite this, some good work was identified. For example:

- DisabledGo have carried out access audits of key customer-facing sites and posted access guides on their website. As discussed, some service areas now link directly to these guides on the contact pages of the Guernsey.gg website.
- Access audit training with the Centre for Accessible Environments (UK) has been carried out with facilities leads from across the States.
- A workshop participant reported that the Education Service's estates team have undertaken a large programme of work to ensure that all states-owned schools and all new schools are accessible to disabled learners and visitors. The work included acoustic treatment of classrooms and paying particular attention to the colours and flooring used.
- The Guernsey Museums and Galleries website contains information about the physical accessibility of key attractions<sup>20</sup>.
- The Royal Court of Guernsey website contains information about accessibility of facilities on its website and invites disabled people to request assistance<sup>21</sup>.

Some participants noted that many of the States' services are delivered from historic buildings which by definition were not built with accessibility in mind. One participant commented that: 'only two buildings (in the whole estate) are built for purpose, others are adapted...every building we are in, we are working against the building'.

Other workshop participants cited the potential cost of adapting premises as barrier. One colleague suggested it would be helpful to understand the return on investment on making physical changes. Another workshop participant reported that although bids for capital works are known to be over utilised, improving accessibility for disabled people is part of the criteria used for considering applications. Participants were unsure what weighting this is given and we recommend that the States review the weighting that accessibility is given in relation to bids for capital works and increase it, if necessary.

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<sup>20</sup> <http://www.museums.gov.gg/article/153016/Access--special-needs>

<sup>21</sup> Royal Court <http://www.guernseyroyalcourt.gg/article/1963/General-Information>

Balancing the need to adapt a building to ensure maximum accessibility and retain historically relevant features or manage a limited budget is a challenge for many organisations. Like the States of Guernsey, many of BDF's members are large organisations with large estates that include many legacy properties. With so many buildings, it is difficult to ensure that all buildings are completely accessible. Leading BDF members manage the challenge by:

- a) **Developing a clear understanding of the accessibility of their customer-related estate.** DisabledGo's recent work to document the accessibility of buildings in Guernsey should provide the States' facilities leads with the basis for developing a detailed understanding of the accessibility of its public service-related buildings<sup>22</sup>.
- b) **Where buildings are inaccessible, developing plans to remove or avoid known barriers.**
- c) **Prioritising when and where to make improvements.** For example, a workaround might be a more appropriate solution for a building that is to be decommissioned.
- d) **Training customer facing staff to recognise when a customer might need support using the building and being proactive in offering support.**
- e) This acknowledges the interplay between the features of a building and the people working within it.
- f) An example was identified in the DisabledGo Access Guide for the reception area of the Accident and Emergency department of the Princess Elizabeth Hospital which identified that a portable hearing loop is available although staff have not been trained to use it<sup>23</sup>.
- g) Appendix E contains a premises accessibility checklist that can be used by facilities leads to quickly assess both the physical and management / training considerations in relation to ensuring the accessibility of a building.

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<sup>22</sup> <http://www.disabledgo.com/organisations/guernsey/main-2>

<sup>23</sup> <http://www.disabledgo.com/access-guide/guernsey/ae-entrance-17#AccessGuide>

## Estates optimisation

Ensuring that the States makes: 'the most effective use of our buildings across the island and ensuring the best possible customer access' is a key pillar of the Public Sector Reform Framework. The Framework includes commitments to increase the flexibility and capacity of public service office accommodation and introduce new space standards for public service office accommodation.

The Estates optimisation initiative represents another opportunity to ensure that the Disability and Inclusion Strategy and Service Guernsey work in harmony. We recommend that a focus on ensuring accessibility for disabled and older islanders is established as a key priority under the estates optimisation programme. In particular, we recommend that:

- Equality Impact Assessments are carried out when making changes to public service office accommodation.
- New space standards for public service office accommodation include standards relating to accessibility for disabled customers.

### **Key recommendations for the overarching Disability Action Plan: Premises**

- Develop a clear understanding of the accessibility of the States' public service office accommodation .
- Where buildings are inaccessible, develop realistic and proportionate plans to remove or avoid barriers.
- Ensure that customer-facing staff are trained to recognise when a customer might need support using the building and be proactive in offering support.
- Review the weighting that accessibility is given in relation to bids for capital works and increase it, if necessary.
- Ensure that accessibility for disabled and older customers is established as a key priority under the estates optimisation programme.
- Ensure that Equality Impact Assessments are carried out when making changes to public service office accommodation.
- Ensure that new space standards for public service office accommodation include standards relating to accessibility for disabled customers
- Provide facilities leads working across the States various service areas with up to date training and guidance on maintaining accessibility.

## 7. Information and Communication Technology (ICT)

**Disability-smart service providers ensure that ICT is accessible and usable by disabled customers and also make technical adjustments for individual customers when required.**

Some positive examples were identified during our review. For example, it was reported that ICT in schools is highly personalised and, where necessary, tailored to the needs of disabled pupils. On the whole though, we found that the needs of disabled customers are not routinely considered in relation to elements of the States' public service ICT.

We have recommended that ICT leads within service areas review the resources developed by BDF's Technology Taskforce<sup>24</sup>. These resources support the ten areas of our Accessible Technology Charter. The Charter sets out ten commitments to good practice on ICT accessibility and has been signed by a number of UK public sector organisations such as the Department for Work and Pensions, HM Revenue and Customs and the Greater London Authority. Appendix G contains the full charter and we recommend that the States of Guernsey signs the Charter and commits to working toward its requirements.

A key requirement of the Charter is to use the Accessibility Maturity Model (AMM) to measure current performance. The AMM is a self-assessment tool that provides an indication of how well an organisation has embedded its understanding of accessibility issues in areas such as IT governance and procurement<sup>25</sup>. We recommend that the States' ICT leads use the AMM to assess the current performance of its public service ICT.

### **Smart Guernsey, the IT Improvement Programme and Digital by default**

The Public Sector Reform Framework sets out an ambition to bring the States' services online and make better use of technology (SMART Guernsey).

A number of workshop participants acknowledged this ambition and were aware that the States intends to become 'digital by default' by providing a single digital portal for all interactions within public services. We recommend that leads working towards the ambition set out as part of Smart Guernsey ensure that:

- Equality Impact Assessments are carried out to understanding the potential impact of ICT-related policy such as 'digital by default' on disabled customers and that solutions are developed where negative impacts are identified.

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<sup>24</sup><http://www.businessdisabilityforum.org.uk/membership/technology-taskforce/accessible-technology-charter/>

<sup>25</sup> <https://members.businessdisabilityforum.org.uk/resource-category/resource/accessible-technology-charter-accessibility-maturity-model/>

- The digital portal is developed to ensure maximum accessibility and usability for disabled users.
- The IT Improvement Programme includes a focus on ensuring that systems and Services are designed to be as inclusive and accessible as possible for disabled users.

**Key recommendations for the overarching Disability Action Plan: ICT**

- Sign BDF's Accessible Technology Charter and commit to working toward its requirements.
- Use BDF's Accessibility Maturity Model to assess the current performance of the States' public service ICT.
- Carry out Equality Impact Assessments to understand the potential impact of ICT-related policy such as 'digital by default' on disabled customers and that solutions are developed where negative impacts are identified.
- Ensure that the digital portal for all interactions within public services is developed to ensure maximum accessibility and usability for disabled users.
- Embed a commitment within the IT Improvement Programme to ensuring that systems and Services are designed to be as inclusive and accessible as possible for disabled users.

## Conclusion and key recommendations

The review was originally prompted by a desire to prepare for disability discrimination legislation in the next few years. In commissioning this review in the absence of legislation, the States of Guernsey has communicated a strong, positive message to its employees and customers that it wishes to take steps to understand and remove disability-related barriers to customers with a disability, long-term injury or conditions.

In summary, our review has identified that some good work already takes place. For example:

- A number of service leads from across the States of Guernsey are already taking a leading role in ensuring that their service area is as accessible as possible to disabled customers as possible.
- Service areas across the States were able to provide examples of anticipating and meeting the needs of disabled customers in a range of settings.
- The States' online disability awareness training is widely known and had been accessed by a significant number of participants in our research. In some cases, this had led to tangible examples of improved practice.
- Some service areas liaise with the Guernsey Disability Alliance in order to understand how services might be improved for disabled customers.

We also identified a number of common challenges across the Committees. Consistent themes included:

- A tension between a genuine desire to improve disability performance and concerns about a lack of resources to invest in specific initiatives.
- The inaccessibility of many of the States' public service buildings.
- Disabled people not being routinely involved in the design and review of services. Where disabled people are involved, there is an over reliance on involving the (relatively small) membership of the GDA.
- The needs of disabled people are not routinely anticipated in relation to the States' various communication channels, particularly in relation to digital communications.
- Where suppliers provide an element of public service, they are not routinely required to demonstrate an understanding and ability to meet the needs of disabled customers.

We have made a number of recommendations arising from our desktop and qualitative research. We are confident that implementing our recommendations will improve the experience of disabled customers whilst at the same time bringing benefits to the organisation, such as greater efficiency, technological innovation and improved customer satisfaction. In this respect we believe that implementing our recommendations will directly support the States' activities under the Public Sector Reform Framework, especially with

regard to improving customer engagement, estates optimisation and making better use of technology.

Key recommendations include:

- Identify an overarching disability champion with responsibility for overseeing systematic improvement of the States' performance as a disability-smart service provider.
- Use information from the recent DisabledGo access audits to build a detailed picture of the accessibility of public service buildings and use this as the basis of a States-wide plan for improving access.
- Develop a mechanism to enable the consistent engagement of a broad range of disabled islanders in order to help the States understand the impact of its activities on disabled customers.
- Allocate funding for improving access for disabled customers from the Public Sector Reform budget when an action is likely to further the aims of both strategies. For example, where recommendations relate to accessible premises or technology.

The strategic action plan set out in Appendix B contains a summary of our recommendations and we suggest that these are taken forward by an implementation group comprising strategic leads working across the broad areas covered in our review.

## Appendix A

### States of Guernsey service leads survey

1. Where do you work?

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2. Which Committee does your area come under?

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3. What is your job title?

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4. What is your name?

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5. What is your contact number?

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6. What is your email address?

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### Commitment

7. Is there a designated senior individual who has responsibility for leading work on meeting the needs of disabled users of the service?

Yes

No

8. (If yes) Please give their details (name, job title, email)

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9. Is there a plan or strategy to improve the delivery of the service as it impacts on disabled customers/service users?

Yes

No

N/A

### Know-how

10. Do you ensure that your public-facing employees are confident interacting with disabled people?

This includes:

Ensuring your employees know what to do in disability-related customer-facing situations; and

Ensuring your employees can access support or guidance on disability-related issues in some way (e.g. through publications, advice or training).

Yes

No

N/A

### Services

11. Do you anticipate the needs of groups of disabled customers/service users (e.g. people with hearing impairments, mobility impairment etc.)?

This includes:

Thinking about the barriers that people with common impairments might encounter when accessing your service and removing them in advance.

Yes

No

N/A

12. Do you ensure that disabled people are involved in the development of your services?

This includes:

Involving and consulting with disabled people when designing and improving your services in order to understand and remove any barriers they might face.

You might do this by gathering feedback from disabled service-users or via social media activity asking for feedback and comments on the service.

Yes

No

N/A

### Suppliers and partners

13. If elements of your service are delivered by a third party supplier, are they required to demonstrate an understanding and an ability to meet the needs of disabled service users?

This includes:

Being able to identify when disability and accessibility are relevant to a contract; and

Ensuring you have a process for identifying if a potential supplier or partner will be able to deliver an inclusive and accessible product or service.

Yes

No

N/A

14. Please list key suppliers that provide an element of a public service (max 150 words)

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## Communication

15. Do you ensure your external communication methods are as inclusive and accessible as possible to disabled service users?

This includes:

Being able to provide information and communications in a range of formats for people with a variety of impairments (for example, large print, Braille, subtitles and transcripts with videos); and

Providing at least three ways for people to get in touch with you (for example, telephone, email, real-time British Sign Language interpretation).

Yes

No

## Premises

16. Do you ensure your premises are inclusive and accessible to disabled service users?

This includes:

Ensuring your premises are inclusive and accessible to service users with a wide range of impairments – from wheelchair-users and people with visual impairments, to people with autism and dyslexia; and

Where it is not possible to be fully accessible (e.g. heritage requirements) that there are other ways of disabled people engaging with your service.

Yes

No

N/A

### Information and Communication Technology (ICT)

17. Do you ensure that your ICT is inclusive and accessible to disabled service users?

This includes:

Making adjustments for disabled service users where your public-facing ICT is not accessible; and

Ensuring you know how accessible your ICT is and having a process for ensuring inclusivity and accessibility are considered during its reviews and maintenance.

Yes

No

N/A

18. How confident are you that your service is currently meeting the needs of disabled customers/service users?

Level of confidence

1  – Not confident

2

3

4

5  – Extremely confident

19. Please can you give more information about the reason for your answer to the previous question?

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## Appendix B

### Recommended strategic Action Plan for improving service for disbaled customers

Recommendation	Page	Lead	Timeframe	Priority
<b>Commitment</b>				
1. Develop a public organisational commitment to meeting the needs of disabled and older islanders.	17			High
2. Review existing organisational priorities such as the Framework for Public Sector Reform to identify where a focus on disability might be included. For example, by ensuring that providing an accessible service to disabled customers is a key pillar of 'Proud to Serve' and any associated or similar initiatives.	17			Medium
3. Identify an overarching champion to oversee the States' work to improve service to disabled customers	17			High
4. Identify a disability Champion for each Principal Committee and require them to regularly report on progress with regard to improving the accessibility of their front line services.	17			High
5. Review customer-service related plans under the Framework for Public Sector Reform to ensure that they include actions to improve the experiences of disabled customers.	17			Medium
6. Explore ways of providing opportunities for service leads from across the organisation to share challenges and good practice with regard to improving disability performance.	17			Medium

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<b>Recommendation</b>	<b>Page</b>	<b>Lead</b>	<b>Timeframe</b>	<b>Priority</b>
7. Ensure that where disability-related priorities are identified by Committees, that these are adequately resourced	17			Medium
<b>Know-how</b>				
8. Continue to promote the States' online disability awareness training to all customer-focused employees.	20			Medium
9. Work with BDF to agree how we might best support in the development of training and guidance for customer focused employees.	20			High
<b>Understanding the needs of disabled customers</b>				
10. Review centrally held demographic data to assess where it might be used to aid Committee's service planning.	23			Medium
11. Develop a consistent approach to Equality Impact Assessment that ensures the needs of disabled islanders are always considered in relation to key customer-related policies and procedures.	23			Medium
12. Develop a consistent approach to consulting with a broad range of disabled customers (not only the GDA).	23			High
13. Explore ways to better support disability advocacy in Guernsey.	23			High
14. Review customer complaints about services that are delivered directly to the public to assess whether any are disability-related. Where complaints are received, ensure that these feed directly into service improvement.	23			Medium

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<b>Recommendation</b>	<b>Page</b>	<b>Lead</b>	<b>Timeframe</b>	<b>Priority</b>
<b>Suppliers and Partners</b>				
15. Ensure that the States' procurement leads review BDF's best practice guidance on disability-smart approaches to working with suppliers and partners.	25			High
16. As a minimum, where elements of a service is delivered by a third party, liaise with the supplier to confirm that they are at least working towards improving disability performance.	25			High
17. Ensure that when awarding new contracts which contain an element of service provision, suppliers are required to demonstrate an understanding and ability to meet the needs of disabled customers.	25			High
<b>Communication</b>				
18. Ensure that any improvements to the main guernsey.gg site undertaken as part of the Smart Guernsey initiative include a review of not only accessibility but also usability as it relates to the experiences of disabled users	31			Medium
19. Ensure that the States' communication leads maintain an overview of work to ensure the accessibility and usability of the States various service-related websites and that resources are allocated to making improvements where necessary.	31			Medium
20. Source or develop guidance on disability-smart approaches to using social media and ensure that this is disseminated to communication leads across the States' service areas.	31			Medium

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<b>Recommendation</b>	<b>Page</b>	<b>Lead</b>	<b>Timeframe</b>	<b>Priority</b>
21. Review central contact provision to ensure that it enables ease of access for disabled islanders.	31			Medium
22. Review processes to ensure that disabled customers can request alternative formats to centrally produced information.	31			Medium
23. Review central communications guidance to ensure that service areas leads have up to date guidance on how to produce accessible information and provide alternative formats when necessary.	31			High
24. Review processes for capturing practical information about disabled customers' communication needs and preferences. Explore whether this can be undertaken as an enhancement to the 'Tell us once' project.	31			Medium
25. Ensure that learning from the review of documentation produced by the Income Tax service is disseminated to other service areas	31			Medium
<b>Premises</b>				
26. Develop a clear understanding of the accessibility of the States' public service office accommodation.	34			High
27. Where buildings are inaccessible, develop realistic and proportionate plans to remove or avoid barriers.	34			High
28. Ensure that customer-facing staff are trained to recognise when a customer might need support using the building and be proactive in offering support.	34			Medium
29. Review the weighting that accessibility is given in relation to bids for capital works and increase it, if necessary.	34			Medium

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<b>Recommendation</b>	<b>Page</b>	<b>Lead</b>	<b>Timeframe</b>	<b>Priority</b>
30. Ensure that accessibility for disabled and older customers is established as a key priority under the estates optimisation programme.	34			High
31. Ensure that Equality Impact Assessments are carried out when making changes to public service office accommodation.	34			High
32. Ensure that new space standards for public service office accommodation include standards relating to accessibility for disabled customers	34			High
33. Provide facilities leads working across the States' various service areas with up to date training and guidance on maintaining accessibility.	34			Medium
<b>Information and communication technology</b>				
34. Sign BDF's Accessible Technology Charter and commit to working toward its requirements.	36			High
35. Use BDF's Accessibility Maturity Model to assess the current performance of the States' public service ICT.	36			Medium
36. Carry out Equality Impact Assessments to understand the potential impact of ICT-related policy such as 'digital by default' on disabled customers and that solutions are developed where negative impacts are identified.	36			Medium
37. Ensure that the digital portal for all interactions within public services is developed to ensure maximum accessibility and usability for disabled users.	36			High

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Recommendation	Page	Lead	Timeframe	Priority
38. Embed a commitment within the IT Improvement Programme to ensuring that systems and Services are designed to be as inclusive and accessible as possible for disabled users.	36			High

## Appendix C

### Audit and action planning tool for individual service areas

<b>Service area:</b>				
<b>Named lead with responsibility for improving access for disabled customers:</b>				
<b>Is the service delivered directly to the public? (Yes/No):</b>				
<b>Please describe the main service channels e.g. online, face to face, phone:</b>				
<b>Question</b>	<b>Yes /No</b>	<b>Comment</b>	<b>Action</b>	<b>Who/when</b>
1. Are public-facing employees are confident interacting with disabled people?				
2. Is there a plan or strategy to improve the accessibility of the service for disabled customers?				
3. Do you anticipate the needs of groups of disabled customers (e.g. people with hearing impairments, mobility impairment etc.)?				

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Question	Yes /No	Comment	Action	Who/when
4. Do you ensure that disabled people are involved in the development of your services?				
5. Can disabled customers request adjustments to services and is there a procedure for making adjustments in a consistent way?				
6. If elements of the service are delivered by a third party supplier, can suppliers demonstrate an understanding and an ability to meet the needs of disabled service users?				
7. Are external communication methods as inclusive and accessible as possible to disabled customers?				
8. Are premises inclusive and accessible to disabled customers?				
9. Is ICT is inclusive and accessible to disabled customers?				

## Appendix D

### Accessible communications checklist

Question	Yes	No
Are you using sans serif fonts like Arial, Calibri or Candara?		
Do you use the same font consistently?		
Is text written in sentence case (Not Title Case or CAPITALS)?		
Do you use <b>bold</b> for emphasis (rather than italics, which is inaccessible to some users)?		
Are you using a minimum of 12pt text (or 14pt for Easy Read)?		
Does the text colour contrast well with the background?		
Is text left aligned (not centred or justified)?		
Do you avoid underlining, capitalisation or italics for emphasis?		
Do you break up long text using clear headings and subheadings?		
Are you using short sentences and plain English wherever possible?		
Do you avoid using colour for emphasis?		
Do you avoid images that rely on colour for meaning?		
Do you explain the content of images in text for users who cannot see them?		
Do you avoid using images as a background for text?		
If you are using video, are these captioned?		
If you are using audio, do you offer a transcript?		
If communicating about disability, are you aware of disability etiquette? See BDF's Disability Communication Guide for more information.		

Question	Yes	No
Do you tell readers where they can go to request the information in an alternative format (e.g. large print, easy read, audio accessible pdf)?		
Do you offer different ways for people to get in touch with you?		
For large and complex communications, have you had these tested by external experts (BDF can advise on this)?		

## Appendix E

### Premises Accessibility Checklist

It is good practice to have an Access Audit carried out so that you know how accessible your buildings are and are aware of any barriers that someone with a disability might encounter. If you cannot remove these barriers, you should develop strategies or put adjustments in place to overcome them.

This document can be used by a Facilities Manager or a Diversity/HR Professional as an aide-memoire for ensuring accessibility within your premises is maintained.

It should be noted that this checklist does not take the place of a full access audit carried out by suitably qualified professionals.

### Arriving at the building Checklist

#### Physical Considerations

Question	Yes	No
Is the main entrance to your building easy to find? (adequate signage on display)		
If your main entrance is not accessible for all disabled people is it obvious where the alternative entrance is?		
Are your designated parking spaces kept available for disabled people? (e.g. have you made it clear these spaces are not for use by non-disabled people)		
Is the walkway to your building free from pot-holes, weeds or loose paving stones?		
Is the pathway/external ramp kept clear particularly in the winter?		
Is your exterior signage in good order? (e.g. nothing obscuring the signage, not faded, or in good working order if electric).		
Is the exterior lighting adequate?		
If you have a temporary ramp, is it in good order and available for use?		
If you have a buzzer or intercom is it in good working order?		

If you have an entry-phone system with an induction loop, is this in good order?		
If you have automatic doors, are they in good working order?		
Is door matting set into a mat well and not loose?		
If difficulties are experienced, is there a bell for assistance which will be responded to?		

### Management or Training Considerations

Question	Yes	No
Are your reception staff trained in assisting disabled people who drive their own cars to the entrance, e.g. can they arrange for the car to be driven to the car park?		
Are your reception or security staff confident in making adjustments for disabled people who cannot use an intercom or entry-phone system? (e.g. due to a hearing or visual impairment)		
Are your reception or security staff confident in assisting disabled people who may have problems opening heavy doors?		

### Comments

## Inside the building Checklist

### Physical Considerations

Question	Yes	No
Is the space between entrance and reception desk clear of obstacles?		
Can people on either side of the reception desk see each other? (e.g. boxes or papers not obscuring the view)		
Is clearance under desks or counters free from clutter to enable wheelchair users to get close enough to fill in forms?		
Is the reception area well lit, to enable people with hearing impairments to lip read easily and people with visual impairments to navigate the areas easily?		
Is your amplifying device or induction loop at reception and is there clear signage advertising this?		
Is your reception seating area tidy and free from obstructions?		
Have you provided Fire Safety and Emergency information in a clearly printed format and have alternative formats available?		

### Management or Training Considerations

Question	Yes	No
Are reception and security staff confident in interacting with disabled people?		
Do you ask visitors if they have any requirements before they arrive at your premises?		

### Comments

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## Moving around inside the building

### Physical Considerations

Question	Yes	No
Is there an up to date map of the building layout near the entrance?		
Does the map have a high colour contrast and use an accessible font and size, for the benefit of people with sight problems?		
Is internal signage in good order and lit adequately?		
Is any temporary signage in an accessible size and font? (e.g. sans serif)		
Is floor covering slip-resistant and safely secured to the floor?		
Are corridors well lit?		
Are all automatic doors working?		
Are hold open devices for fire doors in good working order?		
If you have painted recently, have you used distinctive tones or colours to aid orientation?		
Are elevators in good working order?		
Are the floor announcers and visual signals in elevators working?		
Is there an adequate delay on the elevator door closing mechanism?		
Have you ensured a good standard of cleaning and clearance of obstructions in and around all elevator entrances / exits?		
Is the assistance alarm in the WC in good order?		
Are the toilets clean and clear of obstructions?		
Are your amplifying devices or induction loops in good working order, and are they easy to find?		

### Management or Training Considerations

Question	Yes	No
Are staff trained to direct and assist disabled people in the case of emergency?		
Are your staff trained to respond to and deal with calls for help raised using the assistance alarm in WC?		
Do staff know how to operate amplifying devices or hearing loops?		

### Comments

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## Means of escape in an emergency

### Physical Considerations

Questions	Yes	No
Are ground floor exit and entrance routes accessible to all, including wheelchair users?		
Are exit routes free from obstructions?		
If some disabled people cannot completely evacuate the building, can they reach places of safety or refuges?		
Are refuges free from obstructions / clutter?		
Are refuges clearly signposted?		
Is your audible alarm system in good working order?		

Is your visual alarm system in good working order?		
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### Management or Training Considerations

Question	Yes	No
Do all disabled employees have a Personal Emergency Egress Plan (PEEP)?		

### Comments

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## Appendix F

### List of service-specific websites reviewed

- Beau Sejour Leisure Centre - <http://beausejour.gg/>
- Children Law - <http://childrenlaw.gg/>
- Guernsey Airport - <https://www.airport.gg/>
- Guernsey Buses - <http://buses.gg/>
- Guernsey Diary - <http://www.guernseydairy.com/>
- Guernsey Harbours - <http://www.harbours.gg/>
- Guernsey Museums and Galleries - [www.museums.gov.gg](http://www.museums.gov.gg)
- Guernsey Police - <http://www.guernsey.police.uk>
- Guernsey Registry - [www.guernseyregistry.com](http://www.guernseyregistry.com)
- Guernsey Water - <http://www.water.gg/>
- Health and Safety Executive - [www.hse.gg](http://www.hse.gg)
- The Royal Court of Guernsey - <http://www.guernseyroyalcourt.gg>
- Visit Guernsey - <http://www.visitguernsey.com/>

## Appendix G

### Accessible Technology Charter

1. We will appoint an executive-level ICT Access Champion who will report to the board, raise awareness of the benefits of this agenda and ensure that we achieve continuous improvement in this area.
2. We will ensure that employees understand how technology can liberate the contribution of everyone, including disabled people, as colleagues and as customers.
3. We will routinely consult with disabled employees, customers and experts to ensure that we understand the impact of our technology on: talent management, employee productivity and our diverse customer base.
4. We will allow reasonable personalisation of technology by our employees and customers in order to meet their own accessibility requirements. Technologies that individuals interact with include display, keyboard and mouse, phones and self service facilities.
5. We will embed and promote a reasonable adjustment process that provides speedy and usable ICT solutions for disabled colleagues and customers.
6. We will give our relevant ICT people the 'disability know how' needed to deliver effective business processes and reasonable adjustments for disabled colleagues and customers.
7. We will establish our performance baseline using Business Disability Forum's Accessibility Maturity Model. We will work to practical, easy to communicate accessibility requirements based on existing formal standards and will consistently go beyond minimum compliance to bring greater benefits to our business.
8. We will promote a development lifecycle for our ICT solutions that is based on inclusive design from definition to delivery, to minimise the cost and reputation risk triggered by retrofitting products and systems.
9. We will require, help and encourage our ICT supply partners to develop and deliver accessible products and services. We will formally consider accessibility in all our procurement decisions. We will purchase solutions which are as accessible as possible.
10. We will continuously improve our accessibility; we will document what works and share our learning with the Taskforce.

[www.businessdisabilityforum.org.uk](http://www.businessdisabilityforum.org.uk)

Business Disability Forum is committed to ensuring that all its products and services are as accessible as possible to everyone, including disabled people. If you wish to discuss anything with regard to accessibility of this document please contact us.

Registered charity no: 1018463.

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Registered in England under Company No. 2603700