

Public Consultation

# Discrimination Legislation

Summary of  
Draft Proposals



States of  
Guernsey

July 2019



## Foreword

Although the detail of these draft proposals may seem complicated, at its heart what we are proposing is simple: everyone in Guernsey should be included and have an equal opportunity to participate in the life of our island.

The Committee has worked with partner organisations over the last few months raising awareness about equality issues and the concept of non-discrimination. This has raised the profile of these concepts and resulted in some public debate about whether discrimination legislation is necessary in Guernsey. If we are not on the receiving end, we are unlikely to be aware of what is happening to others. While we do not have a study which quantifies the rate of discrimination, we do have evidence that it happens in Guernsey. Equality and non-discrimination are among the most fundamental principles of democratic government. Discrimination is a global problem, which happens everywhere, and we should not assume that Guernsey is immune to it.

The question is not whether we need to consider discrimination as a policy issue, but how we want to address it.

The States' commitment to take action on these issues goes back a long way. In 1969 the UN Convention on the Elimination of All Forms of Racial Discrimination was extended to Guernsey. Fifty years on we still have not made race discrimination explicitly unlawful. In 2003 the Advisory and Finance Committee brought a Policy Letter to the States which said "The Committee is mindful that any measures to eliminate all forms of discrimination must be appropriate and proportionate. It, therefore, believes the introduction of one comprehensive law represents the best way forward"<sup>1</sup>. This was more than fifteen years ago. In 2013, as part of the Disability and Inclusion Strategy, the States resolved to bring forward proposals for legislation to prevent discrimination against disabled persons and carers. In June 2018, the Committee *for* Employment & Social Security suggested widening the scope of this project to develop proposals for legislation to prevent discrimination against people in relation to a range of characteristics, including disability, but also others not previously included such as race, age and sexual orientation. This suggestion was unanimously approved by the States. We are progressing this work as a priority.

We have drafted our proposals along the lines of international standards for discrimination legislation, which we have tailored into something which, we believe, would be proportionate and effective for Guernsey. While we want to realise greater equality of

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<sup>1</sup> States Advisory and Finance Committee (2003) "Proposals for comprehensive equal status and fair treatment legislation" para 21, in Billet XXI of 2003

opportunity and inclusion as soon as possible, we also want to make sure that the island can cope with the pace of change. We recognise that there is a need for balance.

The Committee is seeking the views of the community on our draft proposals. This includes some specific questions in a questionnaire, but we would welcome feedback on any part of the draft proposals. Please go to [www.gov.gg/discriminationconsultation](http://www.gov.gg/discriminationconsultation).

A handwritten signature in black ink, appearing to read 'Me' followed by a stylized flourish.

Deputy Michelle Le Clerc  
President, Committee *for* Employment & Social Security

## Purpose of this document

This document provides **an overview of the Committee's draft proposals**.

There are also other documents available at [www.gov.gg/discriminationconsultation](http://www.gov.gg/discriminationconsultation).

These include a longer document that gives more detail on the draft proposals and some "frequently asked questions" leaflets about what the draft proposals would mean for people who may experience discrimination and for organisations who employ people or provide services if taken forward. There is also a consultation questionnaire which we would encourage you to complete to help guide the Committee on some important aspects. You do not need to read all of these documents - please choose whichever works best for you.

## Have your say

There are three ways you can respond to this consultation:

1. By completing **the questionnaire** on our key questions (available at [www.gov.gg/discriminationconsultation](http://www.gov.gg/discriminationconsultation) or by contacting us).
2. By **writing to or calling us** with feedback on the draft proposals.
3. By **attending an event** to discuss the draft proposals or inviting us (subject to availability) to come to talk at an event you are hosting. Details of planned events will be listed on [www.gov.gg/discriminationconsultation](http://www.gov.gg/discriminationconsultation).

Please ensure that any responses have reached us by **30 September 2019**.

You can contact us at: [equality@gov.gg](mailto:equality@gov.gg)

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The Committee *for* Employment & Social Security will process any personal data which you provide, through this consultation, in accordance with the Data Protection (Bailiwick of Guernsey) Law, 2017. Further information about how your personal data is processed by the Committee *for* Employment & Social Security can be found at [www.gov.gg/dp](http://www.gov.gg/dp) or by calling 01481 732546.

## What will happen next?

We will publish a summary of what people have told us on [www.gov.gg/discriminationconsultation](http://www.gov.gg/discriminationconsultation) by **early December 2019**. We will use this to help us to finalise our proposals and will bring them to a States debate no later than **April 2020**.

If the States agree, a few more things have to happen before everyone has to comply with the new legislation. First, our legal drafters need to write the new legislation (an ‘Ordinance’) and the Committee needs to bring it to another States debate for approval. Second, we need to make some changes so we can give advice and information about the new legislation and hear complaints. The earliest the legislation could potentially be ‘in force’ would be 2021.

## Why new legislation now?

Guernsey only has one piece of discrimination legislation at the moment which is about sex discrimination in employment. This means that if discrimination happens in other contexts (for example, if a bar tender refused to serve someone because of their sexual orientation) it would not be possible to legally challenge this. Equality is important for our society and we want to make sure discrimination is prohibited.

The kind of legislation we are talking about is common across the world. Jersey and the Isle of Man have both recently expanded their discrimination legislation. We think Guernsey should too.

The proposed legislation would include two key ways to challenge discrimination. First, it would allow people who feel that they have been discriminated against based on a personal characteristic which is protected by the legislation to register a complaint. If the tribunal upheld their complaint in a hearing, then the person or organisation who discriminated against them would have to pay compensation and/or undertake an action to put the situation right. Secondly, it would include a mechanism to require employers and service providers to make changes if they have policies or practices which discriminate against people. This might be through a kind of compliance (non-discrimination) notice.

## Who would the proposed legislation protect?

The proposed legislation will say employers and service providers must not discriminate against someone on the basis of the following ten characteristics:

- Age
- Carer status (people who provide care or support for a dependent child or a disabled person over the age of 18)
- Disability (defined widely – see the technical document for more detail)
- Marital status
- Pregnancy or maternity status
- Race (which includes colour, descent, national or ethnic origin and nationality)
- Religious belief (including lack of religious belief)
- Sex
- Sexual orientation
- Trans status<sup>2</sup>

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<sup>2</sup> This would have similar scope to the ‘gender reassignment’ ground used in the UK.

These are referred to in this document as ‘grounds of protection’ or ‘protected grounds’.

Some of these grounds of protection apply to everyone in Guernsey. Everyone has an age and a marital status, for example. Anyone could be discriminated against. So the legislation will protect everyone.

If you would like more detail on how each of these grounds of protection will be defined, please see our technical document available at [www.gov.gg/discriminationconsultation](http://www.gov.gg/discriminationconsultation).

## In what contexts would discrimination be unlawful?

If agreed, the proposed legislation would allow someone to register a complaint that they have been discriminated against on the basis of one or more of the above grounds of protection:

- when applying for a job
- at work
- in some contexts related to work – for example, in apprenticeships, vocational training, employment agencies, business partnerships, as a director or public office holder, or if a trade union or professional body discriminated against someone
- as a consumer when accessing goods or services – for example, when shopping, at the bank, at the pub, in the hospital, when ordering a taxi, or eating at a restaurant.
- in education
- when using public services
- when buying, leasing or renting a property – both commercial and residential
- when joining or being a member of a club or association

In this document when we say ‘employer’ we also mean employment agencies, vocational training providers, providers of apprenticeships, trade unions and professional bodies. When we say ‘service provider’ we mean providers of goods or services (including in the public sector), education providers, accommodation providers and clubs and associations.

## **Key questions:**

As part of our consultation, there is a questionnaire where we ask specific questions about:

### **The definition of disability**

We have proposed a wide definition of disability. Our questionnaire includes this definition and invites comments on it. Further information on the definition can be found in the technical draft proposals available at: [www.gov.gg/discriminationconsultation](http://www.gov.gg/discriminationconsultation).

### **The relationship of the trans status and sex grounds**

We know that there are a range of views on how the sex and trans status grounds should relate. Two points in particular are being considered. Firstly, we are considering whether 'sex' should be defined based on a person's biology, or based on the gender that they identify as, or whether the definition should be ambiguous in this regard. Secondly, we are considering whether trans people should have access to single sex services on the basis of their biological sex (in all cases); the gender they identify as (in all cases); or whether it should generally be the gender they identify as, but with some discretion.

### **Age discrimination and young people**

We are proposing that children and young people should be protected from **age** discrimination:

- in employment: from the school leaving age (currently 16);
- in education: in dedicated further and higher education establishments (but not in schools, pre-schools or nurseries);
- in accommodation, goods or service provision, and clubs and associations: when they are over 18 only.

This is to ensure that people can plan age appropriate services without needing to worry about an age discrimination complaint being brought against them. Children and young people would be able to register a complaint on any of the other protected grounds, this would only apply to age. We would welcome views on this.

### **Families in rental accommodation**

The inclusion of carer status as a ground of protection will mean that, in general, landlords will not be allowed to refuse to rent to someone based on the fact that they have children (except in very specific circumstances). We are asking about what circumstances people think it should be ok for a landlord to refuse to accommodate a family with children.

Let us know what you think. The questionnaire is available at – [www.gov.gg/discriminationconsultation](http://www.gov.gg/discriminationconsultation)

## What is discrimination?

The proposed legislation would prohibit several different kinds of discrimination.

**Direct discrimination** is treating someone less favourably than another person (or people) in a similar situation or circumstances. The reason for the different treatment must be clearly linked to one or more of the ten grounds of protection listed above for it to be unlawful. For example, if an employer refuses to shortlist a well-qualified candidate because of their age.

**Discrimination by association** is when someone is treated less favourably than another person (or people) in a similar situation or circumstances because of their association with another person who has a protected ground. For example, if a child is discriminated against because of the nationality of their parents (even if the child does not have that nationality).

**Indirect discrimination** is putting rules or arrangements in place that equally apply to everyone, but that inadvertently disadvantage a person or group of people who have a protected characteristic. It can be lawful to have specific rules or arrangements in place which lead to a disadvantage, as long as they can be **objectively justified**. For example, a job advert says that people need to be over a certain height to get the job. On average, women are shorter, therefore, this requirement puts women at a disadvantage. If this requirement were challenged then the employer would need to show that it was objectively justified. This means the employer would be asked what the aim of the height requirement was, and if there was another way of doing things that would meet this aim that would not put women at a disadvantage. If this really was the best way to do things, the employer could keep doing it.

**Discrimination arising from disability** is when a person is treated unfavourably because of something arising from their disability. This might be, for example, that they are treated less favourably because of a behaviour arising from a disability, or the side effects of medication taken associated with a disability; or it might be that they are treated less favourably because they have an assistance animal. An employer or service provider can treat a person less favourably in relation to something arising from their disability if this can be objectively justified (as explained above for indirect discrimination). They also will not be considered to have discriminated if they couldn't reasonably be expected to know that the person was disabled.

Failure to provide an **appropriate adjustment** would also be a form of discrimination.



## Appropriate adjustments and accessibility

The legislation will place a duty on employers and service-providers to make **appropriate adjustments** when requested to enable a disabled person to have the same opportunities as others and be fully included in society. What appropriate adjustments are provided must be discussed with the person needing the adjustment. In some circumstances the appropriate adjustment provided will benefit other people. In other cases, the appropriate adjustment provided will only benefit the person who requested it. Under the proposals, denying someone an appropriate adjustment would be unlawful discrimination unless it would be a **disproportionate burden** for the employer or service-provider to provide the adjustment.

Appropriate adjustments might include making existing facilities and information accessible, providing training, providing a service in a different way, adjusting someone's work tasks or working hours, providing equipment, adjusting curricula, learning materials and teaching strategies or just doing things slightly differently. Everyone would be expected to make small adjustments that cost little or nothing. However, whether someone has to make significant changes (like physical changes to buildings) would depend on the wider impact those changes would have, the size and financial resources of the business, the cost of the adjustment, and other things. If, following consideration, the adjustment would be a disproportionate burden to provide then the person, business or organisation would not have to provide it.

Where appropriate adjustments are about responding to the specific needs of individual employees or service users, accessibility is about inclusive design and proactively trying to ensure that a service is available to as many people as possible. This can be done by planning or designing services or spaces which include people with common impairments to start with. This does not only apply to mobility impairments: it also applies to sensory impairments, intellectual impairments, autism, dementia and more. It is about buildings, but it is also about signage, websites, how information systems are designed, how staff are trained, and how services are delivered.

We propose that the legislation will include an **anticipatory accessibility duty** which would apply to education providers, and providers of goods or services (including the public sector). This would not apply to employers and accommodation providers – they would only have a duty to respond to requests for appropriate adjustments as they arise. It would also not apply to clubs and associations with regard to membership but would apply if they were providing goods or services to the general public.

The proposed anticipatory accessibility duty would require an education provider or goods or services provider to consider common access needs in advance. This can be done by:

- carrying out an access audit;
- developing an appropriate and proportionate Accessibility Action Plan; and
- taking steps to implement the plan.

This would not mean that everyone had to meet a certain standard immediately. It would mean that organisations would need to show that they were thinking about accessibility and taking reasonable steps to improve their accessibility on a prioritised basis, within available resources.

### Key question:

Should there be a time delay before education providers and providers of goods or services have to have an Accessibility Action Plan in place and have to start making changes to buildings?

Let us know what you think.

The questionnaire is available at – [www.gov.gg/discriminationconsultation](http://www.gov.gg/discriminationconsultation)

## Equal pay

Under the proposed legislation, people will be able to register a complaint about equal pay if their employer is not giving them **equal pay for equal work** compared to someone else who works for the same employer (or an employee in an associated employer, like another branch of the company or a parent company). However, the difference in pay must be related to one of the grounds of protection.

### Key question:

One type of equal pay claim is called ‘equal pay for work of equal value’. This means that someone could compare themselves to another person doing a different job to make an equal pay claim if they believe that the work requires a similar level of skills, responsibility and so on. Employers may want to undertake a pay audit before such a provision were introduced. We want to know people’s view on how soon the ability to register complaints of equal pay for work of equal value should be brought in.

One of the questions in our questionnaire is about this:

[www.gov.gg/discriminationconsultation](http://www.gov.gg/discriminationconsultation)

## Other prohibited conduct

The proposed legislation would also prohibit other behaviours:

**Harassment** is any form of unwanted behaviour linked to any of the ten grounds of protection that violates a person's dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment for that person. **Sexual harassment** is any form of unwanted verbal, non-verbal or physical conduct of a sexual nature. The proposals say that employers and service providers must not harass or sexually harass their employees or service users. They must also take reasonable steps to prevent harassment from occurring and to address it if it does occur.

**Victimisation** is treating someone unfairly because they've complained about discrimination or harassment, intend to make a complaint or have helped someone else who has made a complaint. The proposals say that employers or service providers must not victimise people.

We also propose that people or organisations must not publish **discriminatory adverts** which give the impression that they are seeking to attract a particular type of person, thus preventing equal access to opportunities. In addition, adverts which give the impression that someone would be treated differently on the basis of one of the grounds of protection would also not be permitted.

Nor would someone be allowed to give **instructions to discriminate** or put pressure on someone else to do something that is prohibited under the discrimination legislation.

## When would it be lawful to make decisions or base actions on the protected grounds?

There are some situations where it makes sense to treat people differently because of one of the grounds of protection. The proposals outline some of the situations in which it would be lawful to treat people differently.

It would be lawful to treat people differently if one person needs an **appropriate adjustment** and another does not. If an appropriate adjustment would be a disproportionate burden to provide, an employer or service provider would not have to provide it.

It would be ok for an employer to make employment decisions for good reasons not related to the grounds of protection. For example, it is ok not to offer a job to a person who cannot

do the **essential functions of that job**. It would also be ok to dismiss someone (provided that proper procedures were followed) if there were problems with their capability or conduct. However, if the employee is disabled, the employer must check whether the person could do the job with an appropriate adjustment.

It would be lawful in a very limited number of circumstances for an employer to require applicants for a particular job to have a characteristic that is covered by one of the grounds of protection. This is known as a **genuine and determining occupational requirement**. In such circumstances, an employer would need to be able to objectively justify the requirement (e.g. if a charity working with visually impaired people felt it important to have a person with a visual impairment as their outreach worker, it's likely this could be justified).

If an employer or service provider has a provision, policy or practice which disadvantages a person or group of people (i.e. if they **indirectly discriminate**) they might be able to **objectively justify** this (see explanation on page 7). It is proposed that **objective justification** is also a permitted defence for **direct age discrimination** and **discrimination arising from disability**.

**Positive action** means situations where an employer or service provider voluntarily takes steps to address inequality. For example, offering special work experience or shadowing opportunities for women in a male-dominated profession to try to increase job applications from women in the sector. This would be lawful under the proposals, provided the employer or service-provider can justify what disadvantage they are trying to correct, and provided that they do not go so far as to use quotas or appoint a person less qualified for a role only because they have a particular under-represented characteristic.

There will also be a list of **exceptions** specified in the legislation that will say when it is ok to use the grounds of protection to treat people differently. This will cover, for example, offering discounted entry prices to older people, disabled people or families without this being discrimination against people who do not have these characteristics; or being able to continue to use the nationality requirements applied by Population Management and the Guernsey Border Agency.

A list of proposed exceptions is available at [www.gov.gg/discriminationconsultation](http://www.gov.gg/discriminationconsultation)

### Key question:

Have we got the list of exceptions right?

Let us know what you think.

The questionnaire is available at – [www.gov.gg/discriminationconsultation](http://www.gov.gg/discriminationconsultation)

## How would someone register a complaint?

If someone feels that they have been discriminated against then they should raise this with the employer or service provider first. Some employers or service providers will address issues well, leading to good outcomes.

We think taking a case to a formal hearing should be a last resort. Ideally, we want to keep people informed so that they can avoid discriminating in the first place. If discrimination happens, we would like to help people to resolve the issue as soon and as informally as possible, while making sure that cases are taken seriously and there are good outcomes. We think informal resolution is not only more cost-effective, it is also better for everyone involved as it is less confrontational and faster.

However, if someone were not happy with how an employer or service provider has responded to them, they would be able to register a formal complaint.

We already have an Employment & Discrimination Tribunal in Guernsey. The Tribunal can already hear complaints under our existing legislation about sex discrimination, minimum wage and unfair dismissal. We are proposing adapting the Tribunal to hear complaints under the new legislation. We think that this would be preferable to hearing cases in court. The Tribunal is designed to be less intimidating and more accessible to people.

The process for registering a complaint would be similar to the process that is used today. Complaints are registered with the Secretary of the Tribunal. Once a complaint is registered the parties to the complaint are then offered conciliation to attempt to resolve the complaint informally.

If either of the parties does not want to go through the conciliation process and would rather have their case heard by the Tribunal, or if the conciliation process does not lead to an agreement, then a hearing is arranged. Cases are currently heard by three people selected from a larger Panel of people who are trained to adjudicate such matters.

If you would like to find out more about how this would work, please see our technical document available at [www.gov.gg/discriminationconsultation](http://www.gov.gg/discriminationconsultation)

## What would the outcome of complaints be?

If the Tribunal find that discrimination, harassment or victimisation has happened they can:

- order financial compensation be paid to the person who has been discriminated against, harassed or victimised; and/or
- order a non-financial remedy (this might include, for example, a requirement for someone to undergo training or an order to provide an appropriate adjustment).

At the moment if an employer is found to have discriminated under the sex discrimination legislation then the employer must pay three months' pay to the person who has been discriminated against. We think this needs to change under the new proposals. Some cases will be about service provision, not employment, so not all awards can be linked to pay. We also think it is very important that the compensation paid is proportionate to what the person experienced. For example, we think that someone who has been treated in a humiliating and degrading way over a long period of time should receive higher compensation than someone who has, once or twice, experienced discrimination which has been a relatively minor disadvantage and has not personally affected them as much. We are, therefore, proposing introducing compensatory awards which the Tribunal would determine. This would include two elements, financial loss, which is how much a person has actually lost due to unemployment, for example; and injury to feelings based on a simple scale with three bands, similar to the 'Vento Scale' used in the UK. The lower band tends to be for one-off relatively minor incidents, the highest band for the most serious cases which could be an ongoing situation or series of incidents which publicly humiliated or degraded an individual.

Decisions of the Tribunal can be appealed to the Royal Court on a point of law.

### Key question:

We are considering whether there should be upper limits on how much compensation an employer or service provider might have to pay.

Let us know what you think. This is one of the questions in our questionnaire available at: [www.gov.gg/discriminationconsultation](http://www.gov.gg/discriminationconsultation)

## What is the proposed Equality and Rights Organisation?

The functions of the proposed Equality and Rights Organisation are still being determined but could include:

- providing education and raising awareness about equality and human rights;
- providing advice about equality and human rights to members of the public, businesses, the government and other organisations;
- producing codes of practice on any equality legislation (including the proposed discrimination legislation);
- undertaking research on equality issues and monitoring compliance with human rights conventions;
- taking action to ensure people comply with their responsibilities under the proposed discrimination legislation;
- providing support to people to bring cases under the discrimination legislation.

### Key questions:

What functions do you think it would be most important to include in the mandate of an Equality and Rights Organisation?

Where would you feel most comfortable obtaining help and advice on discrimination issues?

Let us know what you think.

The questionnaire is available at – [www.gov.gg/discriminationconsultation](http://www.gov.gg/discriminationconsultation)

The proposed legislation will not achieve its objective if people do not understand their rights or responsibilities. We know that some people who feel they have experienced sex discrimination have not made complaints under the existing legislation for reasons related to cultural factors – such as the tone of leadership in their organisation, the lack of awareness of rights, or not knowing where to get advice.

If there is good reason to think that an employer or service provider was discriminating or doing something unlawful under the proposed legislation, the Equality and Rights Organisation (if established, or the Employment Relations Service if not) would be able to do an investigation to see if a person or organisation was doing something unlawful. If the employer or service provider was found to be discriminating, a warning could be issued telling the employer or service-provider what they had found and what needed to be done

to put it right. If the employer or service provider did not do what they needed to, the Equality and Rights Organisation (or the Employment Relations Service) could issue a compliance notice.

Under the Committee's proposals, it would be possible to appeal a compliance notice by referring this to the Tribunal. However, if the compliance notice was neither appealed nor complied with then the employer or service provider could be fined.

We are proposing this because we think it is an important and useful tool to challenge and change discriminatory practices which have the potential to affect a lot of people without relying on individuals to bring complaints. It is very similar to the 'non-discrimination notices' under our existing sex discrimination legislation.

## Summary: why is the proposed legislation right for Guernsey?

We think that the draft proposals, if developed into legislation, would meet Guernsey's needs, and be effective, for the following ten reasons:

1. **Everyone will have rights.** The draft proposals cover multiple grounds of protection – which include attributes which everyone has (like age) - so the legislation will provide necessary protection for everyone on the island.
2. We are proposing that there will **only be one piece of discrimination legislation** in future. This would ensure that things are consistent and straightforward.
3. The draft proposals are **based on the fundamentals of international standards**.
4. The complaints process in the draft proposals would **encourage people to resolve things informally**, if possible.
5. We are suggesting that there should be **free advice and awareness raising** so that employers and service providers know what their responsibilities are, and people know what their rights are, before the legislation comes into force, so that they have time to prepare for it.
6. We are proposing to retain the fact that you **do not have to have a lawyer** to bring a case. The Employment & Discrimination Tribunal is designed to allow people to bring cases without having a lawyer if they wish to. This might save expense and prevent things from becoming unnecessarily legalistic.



7. We are proposing that compensation will be **proportionate** to how serious the case is rather than a fixed award for everyone. If taken forward, we are proposing that the Tribunal would **also be able to order action** as well as, or instead of, financial compensation. This would mean that the behaviours or causes of discrimination could be addressed through, for example, requiring changes to discriminatory policies or requirements to undertake training.
8. The draft proposals **build on existing structures**. We are intending to adapt the existing Employment & Discrimination Tribunal to manage complaints under the new legislation rather than start again from scratch.
9. The draft proposals include **Guernsey specific exceptions** which will allow us to continue to treat people differently on the basis of the protected grounds where this is fundamental to the way the island works – for example, the legislation will still allow Population Management to use some of the protected grounds when considering someone’s employment permit.
10. We will be bringing forward proposals for an Equality and Rights Organisation, which will be able to **intervene early on** if someone is behaving in a discriminatory way, so that this can be addressed without an individual needing to bring a case.

## What do you think? Would you like more information?

You are welcome to give us feedback on any of our draft proposals, and not only our key questions.

A detailed version of the Committee’s draft proposals, a questionnaire and answers to some frequently asked questions are available at [www.gov.gg/discriminationconsultation](http://www.gov.gg/discriminationconsultation).

If you need clarification about any aspects of the Committee’s draft proposals or to provide your views, please contact us at:

[equality@gov.gg](mailto:equality@gov.gg)

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