

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

Committee *for the Environment and Infrastructure*

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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 report for the Committee *for the* Environment and Infrastructure 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.

To this end we:

- Surveyed service area leads
- Held a workshop with service area leads
- Held a focus group with disabled islanders
- Reviewed publically available online information about the Committee *for the* Environment and Infrastructure's services

In summary, our review has identified that some good work already takes place with regard to the public services delivered by the Committee *for the* Environment and Infrastructure. For example:

- Traffic and Highway Services has disability-related plans in place in relation to improving accessibility for disabled islanders and resources have been allocated to facilitate implementation.
- 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 drive¹.
- The Guernsey Disability Alliance (GDA) have been involved in service design.
- Disabled islanders and visitors can use accessible buses and taxis.

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

Although confidence among survey respondents that their service area is currently meeting the needs of disabled customers was high (4 out of 5), some areas for improvement have been identified. For example:

- There are currently no named leads with responsibility for driving improvement in the service of the Committee for the Environment and Infrastructure's disabled customers.
- 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.

Appendix B contains a recommended Disability Action Plan for the Committee for the Environment and Infrastructure. The Actions flow directly from the findings in the report and we recommend that senior colleagues with responsibility for customer service within the Committee for the Environment and Infrastructure assume overall responsibility for the plan.

Key recommendations include:

- Identify a named lead within each service area who has responsibility for leading work on meeting the needs of disabled customers.
- Ensure that nominated leads review the current disability-related performance of their service area (using the audit and action planning tool in Appendix C) and where necessary develop improvement plans.
- Ensure that where services are delivered directly to the public, that a broad group of disabled people (not only GDA members) are involved in the development and review of those services.

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 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. In addition to Committee-specific reports, we have also produced an overarching report that summarises our findings, compares performance between Committees and explores broad strategic issues that cut across individual services.

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
- The usability and accessibility of key service channels
- The ease with which disabled customers can request and access adjustments to help overcome the barriers they face
- Gaining insight directly from disabled people
- How disability-related customer complaints are recorded, analysed and responded to

Improving service for islanders with disabilities improves things for everyone

In the experience of BDF's membership, improving disability confidence is a catalyst for greater efficiency, technological innovation and improved and customer satisfaction. It also improves the experiences of many older customers (who are more likely to be disabled).

With this in mind, improving provision for disabled customers is directly relevant to the State's wider public sector reform work (Service Guernsey) which contains the following aims:

- Improving customer engagement and satisfaction
- Demonstrating value for money
- Improving staff engagement and satisfaction
- Enhancing organisational performance measurement and management

In addition, building an understanding and ability to meet the needs of disabled islanders is consistent with the States' aim of ensuring that the organisation is 'designed around meeting community needs, rather than expecting the customer to adapt to the public service's internal procedures and structures'².

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.

Two respondents indicated that they worked under the Committee *for the Environment and Infrastructure*, covering the following services:

- Licensing & Operations
- Traffic & Highway Services

² 'A framework for public service reform 2015-2025' page 3.
<https://www.gov.gg/CHttpHandler.ashx?id=97310&p=0> (accessed 12/04/17)

2. BDF facilitated workshops with service leads from each Principal Committee over 21 March and 22 March, 2017. The workshop for service leads working under the Committee for the Environment and Infrastructure was held on 21 March and was attended by 12 nominated representatives.

At the request of the States of Guernsey, the workshop was held jointly between the Committee for the Environment and Infrastructure and the Committee for Economic Development.

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, the Guernsey Buses website³ and the Traffic and Highways Services Facebook page⁴.

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 services. 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.

³ <http://buses.gg/>

⁴ <https://www.facebook.com/Traffic-and-Highway-Services-734403630041258/>

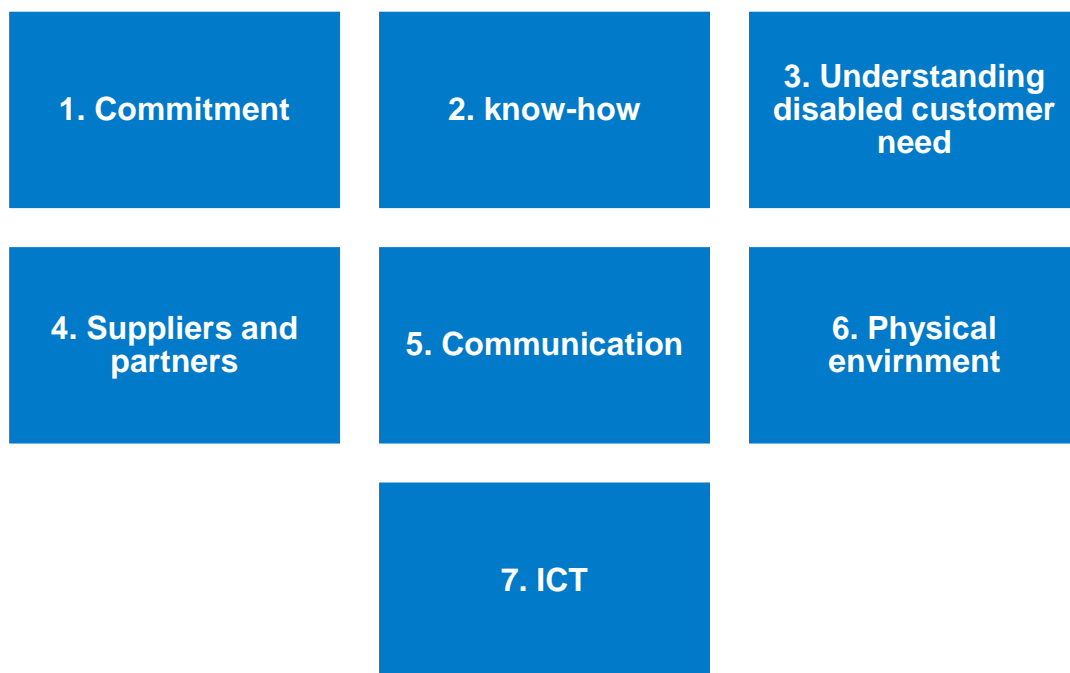
Analysis of disability performance: Committee for the Environment and Infrastructure

Survey respondents were asked to rate how confident they were that their service area is currently meeting the needs of disabled customers. Of the two responses to this question, both indicated high levels of confidence with a score of 4 out of 5.

This section sets out the findings of our research into the extent to which the needs of disabled islanders are considered by services under the Committee for the Environment and Infrastructure.

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 one: structure of our analysis



Assessing when disability is relevant to a particular service area

A review of the States of Guernsey's guide on Brand Structure identifies the following service areas as part of the Committee for Environment and Infrastructure:

- Traffic and Highway Services
- Renewable Energy
- Agriculture, Countryside and Land Management Services
- Driver and Vehicle Licensing

Given the varied nature of the service areas that sit underneath each Principal Committee, including the Committee for Environment and Infrastructure, it is important to note that the need for a disability-smart approach to customer service will not have the same degree of relevance for each service. For example, where a service area does not involve direct interaction with members of the public.

Where services are not delivered directly to the public, we would encourage service leads to think broadly about how they will meet the needs of the people with disabilities that they interact with, when they are not employees e.g. clients, visitors and any other stakeholders etc.

In our previous engagements with public sector organisations that do not provide services directly to the public, examples of good practice include:

- Front of house staff (e.g. reception and security) undergoing training and accessing guidance to aid situations where they might have to make adjustments for a disabled visitor.
- Developing proactive inclusion statements which invite all stakeholders to ask for information, communications, or visits (for example) to be done differently. For example, by providing a consultation document in large print or in audio, or sourcing a sign language interpreter for a meeting.
- Ensuring that processes enable requests for adjustments to be actioned.

In addition, some service areas may not interact directly with the public yet their activities may have a direct impact. For example, the accessibility of public areas managed by Agriculture, Countryside and Land Management Services. In these cases, it is important that the needs of disabled islanders are understood and incorporated into the Service's plans and activities.

We have collated our recommendations into an action planning tool in Appendix B which we recommend is reviewed by senior leads with a remit for service delivery within the Committee for Environment and Infrastructure.

1. Commitment

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

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.

Question seven of the service leads survey asked respondents if there is a designated senior individual who has responsibility for leading work on meeting the needs of disabled users of their service area. Both survey respondents indicated that there was no senior lead with responsibility for improving disability. Given the strategic importance of disability to the States of Guernsey as set out in the Disability and Inclusion Strategy, we recommend that the Committee for the Environment and Infrastructure's senior leadership ensures that each service area (where relevant) has a nominated lead who is responsible for progressing work on improving provision for disabled users of their service.

To ensure that work is targeted and consistent, we recommend that the lead use the audit and action planning tool that we have developed in Appendix C to formally measure and improve the performance of the service.

Understanding the rationale for improving disability performance

Disability-smart service providers are able to articulate why improving disability performance is important to the organisation. In addition to the impetus provided by the Disability and Inclusion strategy, workshop participants noted that Guernsey's ageing population was a key driver. For example, one participant reported that colleagues working in Driver and Vehicle Licensing are seeing more accidents involving older drivers. Participants discussed what processes should be in place to check safety of older drivers.

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. In response to a question about whether there is a plan or strategy to improve the delivery of services as they impact on disabled customers, one respondent indicated that a disability-related plan exists.

During the workshop, participants reported that the Traffic & Highway Service have detailed disability-related plans and that resources have been allocated to facilitate implementation. Participants noted that the plans had been developed in consultation with

the Guernsey Disability Alliance (GDA) and contain a specific focus on training bus and taxi drivers and providing on demand transport for disabled travellers. This is very positive.

The importance of having specific plans was noted by one workshop participant who suggested that generally a plan was required 'to provide direction and targets for achieving universal access'. This is certainly a recommendation that we would support.

Key recommendations for the Disability Action Plan:

- Identify a named lead within each service area who has responsibility for leading work on meeting the needs of disabled users of their service.
- Ensure that service area leads use the audit and action planning tool in Appendix C to formally measure and improve the performance of their service.
- Consider whether disability-related objectives might be included within existing customer-related plans or strategies (in addition to the actions referenced in the Traffic & Highway Service's plan).

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.

Survey respondents were asked if they ensure that public-facing employees are confident interacting with disabled people, both respondents indicated that colleagues are confident. This is positive and we also noted that workshop participants were aware of the online disability awareness training that the States has developed and several participants had undertaken the training.

Workshop participants stated that their thinking on customers and disability was more focused on mobility issues and access to premises with one participating suggesting that they would value 'more training on how to deal with people with less visible disabilities'. In particular, some workshop participants identified a need for more training for staff in relation to serving customers with a mental health condition. For example, in relation to driving licence and Blue Badge issues because, staff were thought to be confident in mobility issues but less so in the area of mental health. Another workshop participant agreed that training on mental health would also be beneficial in terms of building the confidence of customer-facing colleagues in the Planning department.

A number of participants raised the issue of proportionality, suggesting that balancing customers' expectations with other considerations such as restrictions relating to upgrading historic buildings is an ongoing challenge. One participant suggested that 'guideline principles to enable a balanced and proportionate approach to customer demands' in relation to Agriculture, Countryside and Land Management Services would be welcome.

Key recommendations for the Disability Action Plan:

- Continue to promote the States' free online disability awareness training to all public facing employees working within the Committee for Environment and Infrastructure's service areas and monitor take up.
- Consider commissioning training and/or guidance that includes a focus on meeting the needs of customers with mental health conditions in relation to public-facing service areas such as Planning and Driver and Vehicle Licensing.
- Develop guideline principles to enable a proportionate approach to balancing customer demands with factors such as restrictions relating to upgrading historic buildings.

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

Survey respondents were asked if the needs of groups of disabled customers (i.e. people with visual impairment, mental health conditions etc.) are anticipated. Both responses were positive.

Workshop participants discussed how disability-related data might be used to better enable services to anticipate the needs of islanders. One participant recommended that the States 'needs to design services based on evidence and statistics'. Participants stated that they did not use disability data in their considerations and there appeared to be a general lack of awareness about what relevant data might exist and how it might be useful as an aid to their strategic planning.

One workshop participant suggested that the States 'does not always know what services people want', for example in relation to access to Guernsey's beaches. This highlights the importance of engaging directly with disabled islanders in order to understand their needs. In a question about whether disabled people are involved in the development of services, both respondents answered positively. For example, workshop participants reported that the GDA had been consulted in relation to the State's Traffic and Highways and land management activities. This is very good practice and was also recognised as such during a focus group with GDA members.

An understanding of the needs of disabled islanders is clearly evident in an online guide on 'Transport for People with Disabilities' which covers areas such as the accessibility of buses, taxis, parking and issues relating to either returning to, or learning to drive⁵.

One GDA focus group participant welcomed being consulted and suggested that, given that there is potentially around 13,000 disabled people in Guernsey, the States should ensure that the GDA's members are not the only source of insight into the views and experiences of disabled islanders. The GDA member suggested that consulting with Blue Badge holders would provide a useful means of enabling wider consultation. This would enable access to a wider group of people, one Committee for Environment and Infrastructure workshop participant reported that 1,800 blue badges are currently in use.

⁵ <https://www.gov.gg/CHttpHandler.ashx?id=101710&p=0>

One workshop participant noted that it is important to understand the impact of key decisions about planning where these related to access for disabled people. The participant suggested that Equality Impact Assessments should be carried out to ensure that key decisions consider the needs of disabled people (and other groups). This is a recommendation that BDF would support and we work with many public sector organisations in the UK for which equality impact analysis forms an integral part of the decision making process.

In addition to involving disabled customers in service design and delivery, leading BDF members review complaints to assess whether any are disability-related. This is a practice that we would recommend that relevant service areas under the Committee for Environment and Infrastructure also adopt.

Key recommendations for the Disability Action Plan:

- Ensure that disability-related statistics such as census data is shared with service leads from the Committee for Environment and Infrastructure in order to inform service planning.
- Ensure that where services are delivered directly to the public that disabled people are routinely involved in the development and review of those services.
- Consider ways of widening consultation beyond the membership of the GDA. For example, by using the database of Blue Badge holders.
- Develop a consistent approach to equality impact assessment that ensures the needs of disabled islanders are always considered in relation to key decisions.
- Review complaints received about services that are delivered directly to the public to assess whether any are disability-related.

4. Suppliers and Partners

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

The survey asked respondents that if elements of their 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?

One respondent indicated that between 6-10 other organisations are involved in delivering elements of the services that the Committee for Environment and Infrastructure provide. It is vital that the Committee ensures that these organisations are at least working towards improving their own disability performance. This is because while outsourced elements of service delivery fall outside the organisation, the legal, reputational and financial risks of poor disability practice do not.

During the workshop, participants discussed the following third parties:

- The bus service which is operated by CT Plus on behalf of Environment and Infrastructure. Workshop participants commented that bus drivers were considered to be very helpful when assisting passengers with physical disabilities although they were less certain about how they would respond to passengers with non-visible disabilities (the example of a passenger with a speech impairment was given). There was uncertainty among the group as to whether bus drivers received training, although participants suggested that there was a budget for training. A review of the Guernsey bus service website identified some potentially useful information about the accessible features of buses but did not say whether drivers have been trained in meeting the needs of disabled passengers⁶.
- The drivers of Guernsey's accessible taxi drivers. It was reported during the workshop that there were four known accessible taxis on the island and that each driver had to complete a full day's training to be licensed.
- However, it was stated that there was no requirement for other taxi drivers to undertake any form of disability training although a review of the Disability and Inclusion Strategy Highlight report (number 3) reported that the Transport Service consulted with the Taxi Federation regarding awareness training for taxi drivers⁷.
- The States of Guernsey might also seek to influence local private taxi firms by making training on meeting the needs of disabled customers a compulsory requirement for any taxi used by the States.

⁶ http://buses.gg/about/accessible_service

⁷ <http://www.signpost.gg/CHttpHandler.ashx?id=106257&p=0>

- Driving examiners. It was reported that examiners have made adjustments for disabled motorists.

Key recommendations for the Disability Action Plan:

- Review the extent to which third parties deliver elements of public service on behalf of the Committee for Environment and Infrastructure.
- Where elements of the Committee for Environment and Infrastructure's public services are delivered by third parties, liaise with suppliers to ensure that they can demonstrate an understanding and ability to meet the needs of a disabled customers.
- Confirm whether bus drivers receive training on meeting the needs of passengers with both physical and non-physical disabilities. If not, then commission training.
- Consider how to improve the disability confidence of drivers working for private taxi firms. For example by making training on meeting the needs of disabled customers a compulsory requirement for any taxi used by the States.

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

Survey respondents were asked if they ensure that external communication methods are as inclusive and accessible as possible to disabled service users. One response was positive and one was negative.

It is advisable that the Committee for Environment and Infrastructure's key service areas review communications to ensure they have been designed with accessibility in mind. This includes:

Websites

A review of the Guernsey.gg website identified that much of the Committee's customer-related information is housed on the States' main website. Whilst the architecture of the site is beyond the remit of individual service areas there may be an opportunity to improve content.

This is relevant as the December 2015 GDA response to the Community Survey included a comment from a disabled person who suggested that improvements could be made by "staff inputting to and using the website to ensure it is up to date and has all the information needed".

A review of the contact pages for service areas under the Committee highlighted an opportunity to build on good practice and ensure greater consistency between services.

As a minimum, customers should be offered a range of contact methods and we were pleased to note that customers with queries are invited to either fill out an online form, phone, email or visit in person. We also noticed that the contact page for the Agriculture, Countryside and Land Management Services included a link to more detailed information (via the DisabledGo website) about the accessibility of its office⁸. This is excellent practice that we recommend other service areas replicate.

⁸ <https://www.gov.gg/article/153511/Contact-Us---Agriculture-Countryside-and-Land-Management-Services>

Contact provision (phone and/or online)

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 menu⁹.

Virtual communications

For example social media or videos. Many organisations present key information in videos which can disadvantage customers with a hearing impairment if they are not subtitled.

During a focus group, a GDA participant commented that “there is very little evidence that social media is being used by the States”. Our review identified that the Traffic and Highways Service has an active Facebook page which provides islanders with updates. This is positive practice and we would encourage the States employees with responsibility for the page to consider:

- Including updates on works that might impact on disabled islanders. For example, one GDA member who is a wheelchair user explained at a focus group that works which limit pavement space can sometimes mean they are unable to reach their destination.
- The accessibility of social media content. For example, it is important that nothing is conveyed in an image alone. This includes photos of works/obstructions or an image which contains important written information.

Hard copy information

Promotional materials, forms and other documents can disadvantage disabled users if information is overly complicated and accessible design guidelines are not followed.

Participants at a focus group for disabled islanders highlighted the accessibility and general tone of the States’ paperwork as a key barrier to engaging with the States. While the Committee for Environment and Infrastructure’s service areas were not identified by participants as being particularly problematic (one participant commented that communications from the Highways and Traffic Service had improved), this demonstrates the potentially negative impact of inaccessible communications.

Indeed, a Committee workshop participant suggested that forms might be improved to ‘more specifically relate to the needs of disabled people’. Appendix D contains a checklist for producing accessible information that service leads within the Committee for Environment and Infrastructure might like to review to help ensure that forms and any other information meets minimum standards of accessibility.

⁹ BDF can provide the States with a briefing ‘Top tips for disability-smart call handling’

In addition, 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 underway¹⁰. We hope that learning from this exercise is shared with other services under the Committee for Environment and Infrastructure.

Key recommendations for the Disability Action Plan:

- Ensure that (where available and relevant) all service areas' contact pages contain information about accessibility (following the example of Agriculture, Countryside and Land Management Services)
- Ensure that social media content provides updates about works that might impact on disabled islanders' ability to travel independently and that good practice guidelines regarding accessibility are followed.

¹⁰ <http://www.signpost.gg/CHttpHandler.ashx?id=107652&p=0>

6. Physical environment

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

Both survey respondents answered positively to a question that asked if they ensure that premises are inclusive and accessible to disabled service users. Workshop participants however, felt that the accessibility of some buildings was a major issue. 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'.

Balancing the need to adapt a building to ensure maximum accessibility and retain historically relevant features is a difficult balancing act for many organisations. This is recognised in the Island Development plan which seeks 'to enable a balance to be achieved between conservation and the needs of disabled people in regard to protected buildings'¹¹. Another workshop participant highlighted the potential cost of adapting premises as barrier and suggested it would be helpful to understand the return on investment on making physical changes to buildings and spaces.

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:

- 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 Committee *for the Environment and Infrastructure* with the basis for developing a detailed understanding of the accessibility of its public service-related buildings¹².
- Where buildings are inaccessible, developing plans to remove or avoid known barriers.
- 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.
- Training customer facing staff to recognise when a customer might need support using the building and being proactive in offering support. This acknowledges the interplay between the features of a building and the people working within it. A common example that we often hear about which highlights the importance of

¹¹ <https://www.gov.gg/CHttpHandler.ashx?id=104804&p=0>

¹² <http://www.disabledgo.com/organisations/guernsey/main-2>

having disability-aware staff is a situation where an accessible toilet is used as a store cupboard. 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.

Wider physical environment

Discussions in the workshop extended beyond the accessibility of States buildings and into the wider physical environment that the Committee for Environment and Infrastructure is responsible for managing.

Workshop participants discussed the value of carrying out an audit to identify ways and means of improving access to public areas that the committee manages, for example, beaches, cliffs, coastal paths, parks and gardens. Another participant noted the need for good information on the accessibility of public spaces to be made available online.

A review of the Guernsey section on the DisabledGo website, identified that access guides to Guernsey's beaches are now available¹³. This is positive and should provide the basis (along with consultation with disabled users) for an assessment of how access at beaches might be improved.

Key recommendations for the Disability Action Plan:

- Develop a clear understanding of the accessibility of the Committee for Environment and Infrastructure's public facing buildings.
- Where buildings are inaccessible, develop realistic and proportionate plans to remove or avoid barriers.
- Ensure that any customer-facing staff are trained to recognise when a customer might need support using the building and be proactive in offering support.
- Use the access guides developed by DisabledGo relating to public spaces such as beaches and parks as the basis for a plan to improve access for disabled islanders and visitors. Ensure that disabled islanders are also involved in the development of plans.

¹³ <http://www.disabledgo.com/places-to-go/venue-search-results?campusid=7375dafb-7884-4435-a484-8ffbf6657c38&subdivisionids=b5c8069d-2f35-4eaf-a7e2-2deca3f0895c&categoryids=0ea06dc8-1fd7-45b4-80f3-7082785f702e&searchterm=guernsey&displaylocation=guernsey&displayterm=beaches+%26+bays> (accesses 13/05/17)

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.

The survey asked respondents if they ensure that ICT is inclusive and accessible to disabled service users. One respondent answered positively and the other negatively.

The accessibility of electronic forms was discussed during the workshops. Participants discussed how:

- Forms might be made more accessible. For example, by following best practice guidance produced by organisations such as the RNIB on creating accessible forms¹⁴.
- Customers might be made more aware of how the inbuilt accessibility features of their own computer or web browser might improve access. For an example of how customers can be encouraged to use such features, see the accessibility page on the Guernsey Buses website¹⁵. It is important to note that providing this type of information should not take the place of ensuring that websites are built to recognised standards of accessibility.

Business Disability Forum's Technology Taskforce has developed a number of resources to help organisations improve the accessibility of their ICT. For example:

- The Accessible Technology Charter sets out ten commitments to good practice on ICT accessibility¹⁶.
- The Accessibility Maturity Model is a self-assessment tool that provides an indication of how well an organisation or service area has embedded its understanding of accessibility issues in areas such as IT governance and procurement¹⁷.

¹⁴ www.rnib.org.uk/sites/default/files/Creating%20accessible%20forms.docx

¹⁵ http://www.buses.gg/about/accessible_service (accessed 14/04/17)

¹⁶ <http://www.businessdisabilityforum.org.uk/membership/technology-taskforce/accessible-technology-charter/>

¹⁷ <https://members.businessdisabilityforum.org.uk/resource-category/resource/accessible-technology-charter-accessibility-maturity-model/>

Adopting the principles of the Accessible Technology Charter will be a key recommendation in our overarching report for the States of Guernsey, however ICT leads working within the Committee for Environment and Infrastructure may also find the resources of value.

Key recommendations for the Disability Action Plan:

- Ensure that any electronic forms used by public services of the Committee for Environment and Infrastructure are designed following good practice accessibility guidelines.
- Communicate to customers how using in-built accessibility functions can improve access to online forms.
- Provide IT leads working within the Committee for Environment and Infrastructure with information and guidance developed by BDF's Technology Taskforce.

Conclusion and key recommendations

In summary, our review has identified that some good work already takes place with regard to the public services delivered by the Committee for Environment and Infrastructure. For example:

- The Highways and Traffic Service have disability-related plans and resources have been allocated to facilitate implementation.
- Islanders are provided with guidance. For example, 'Transport for People with Disabilities' which covers areas such as accessibility of buses, taxis, parking, and issues relating to either returning to or learning to drive¹⁸.
- The GDA have been involved in service design.
- Disabled islanders and visitors have can use accessible buses and taxis.

Although confidence among survey respondents that their service area is currently meeting the needs of disabled customers was relatively high (4 out of 5), some areas for improvement have been identified. For example:

- The Committee currently has no named leads with responsibility for driving improvement in the service of disabled customers.
- 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.

Appendix B contains a recommended Disability Action Plan for the Committee for Environment and Infrastructure. The Actions flow directly from the findings in the report and we recommend that senior colleagues with responsibility for customer service within the Committee for Environment and Infrastructure assume overall responsibility for the plan.

Key recommendations include:

- Identify a named lead within each service area who has responsibility for leading work on meeting the needs of disabled customers.
- Ensure that nominated leads review the current disability-related performance of their service area (using the audit and action planning tool in Appendix C).
- Ensure that where services are delivered directly to the public that a broad group of disabled people (not only GDA members) are involved in the development and review of those services.

¹⁸ <https://www.gov.gg/CHttpHandler.ashx?id=101710&p=0>

Appendix A

States of Guernsey service leads survey

1. Where do you work?

2. Which Committee does your area come under?

3. What is your job title?

4. What is your name?

5. What is your contact number?

6. What is your email address?

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)

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)

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?

Appendix B

Recommended Action Plan for the Committee for Environment and Infrastructure

Recommendation	Page	Lead	Timeframe	Priority
Commitment				
1. Identify a named lead within each service area who has responsibility for leading work on meeting the needs of disabled users of their service.	10			High
2. Ensure that service area leads use the audit and action planning tool in Appendix C to formally measure and improve the performance of their service.	10			High
3. Consider whether disability-related objectives might be included within existing customer-related plans or strategies (in addition to the actions referenced in the Traffic & Highway Service's plan).	10			Medium
Know-how				
4. Continue to promote the States' free online disability awareness training to all public facing employees working within the Committee for Environment and Infrastructure's service areas and monitor take up.	11			Medium
5. Consider commissioning training and/or guidance that includes a focus on meeting the needs of customers with mental health conditions in relation to public-facing service areas such as Planning and Driver and Vehicle Licensing.	11			Medium

Recommendation	Page	Lead	Timeframe	Priority
6. Develop guideline principles to enable a proportionate approach to balancing customer demands with factors such as restrictions relating to upgrading historic buildings.	11			Medium
Understanding the needs of disabled customers				
7. Ensure that disability-related statistics such as census data is shared with service leads from the Committee for Environment and Infrastructure in order to inform service planning.	14			Medium
8. Ensure that where services are delivered directly to the public that disabled people are routinely involved in the development and review of those services.	14			High
9. Consider ways of widening consultation beyond the membership of the GDA. For example, by using the database of Blue Badge holders.	14			Medium
10. Develop a consistent approach to equality impact assessment that ensures the needs of disabled islanders are always considered in relation to key decisions.	14			Medium
11. Review complaints received about services that are delivered directly to the public to assess whether any are disability-related.	14			Medium
Suppliers and Partners				
12. Review the extent to which third parties deliver elements of public service on behalf of the Committee for Environment and Infrastructure.	16			High

Recommendation	Page	Lead	Timeframe	Priority
13. Where elements of the Committee for Environment and Infrastructure’s public services are delivered by third parties, liaise with suppliers to ensure that they can demonstrate an understanding and ability to meet the needs of a disabled customers.	16			High
14. Confirm whether bus drivers receive training on meeting the needs of passengers with both physical and non-physical disabilities. If not, then commission training.	16			Medium
15. Consider how to improve the disability confidence of drivers working for private taxi firms. For example by making training on meeting the needs of disabled customers a compulsory requirement for any taxi used by the States.	16			Low
Communication				
16. Ensure that (where available and relevant) all service areas’ contact pages contain information about accessibility (following the example of Agriculture, Countryside and Land Management Services)	19			Low
17. Ensure that social media content provides updates about works that might impact on disabled islanders’ ability to travel independently and that good practice guidelines regarding accessibility are followed.	19			Medium
Premises				
18. Develop a clear understanding of the accessibility of the Committee for Environment and Infrastructure’s public facing buildings.	21			High
19. Where buildings are inaccessible, develop realistic and	21			High

Recommendation	Page	Lead	Timeframe	Priority
proportionate plans to remove or avoid barriers.				
20. Ensure that any customer-facing staff are trained to recognise when a customer might need support using the building and be proactive in offering support.	21			High
21. Use the access guides developed by DisabledGo relating to public spaces such as beaches and parks as the basis for a plan to improve access for disabled islanders and visitors. Ensure that disabled islanders are also involved in the development of plans.	21			Medium
Information and communication technology				
22. Ensure that any electronic forms used by public services of the Committee for Environment and Infrastructure are designed following good practice accessibility guidelines.	22			High
23. Communicate to customers how using in-built accessibility functions can improve access to online forms.	22			Medium
24. Provide IT leads working within the Committee for Environment and Infrastructure with information and guidance developed by BDF's Technology Taskforce.	22			Medium

Appendix C

Audit and action planning tool for individual service areas

Service area:				
Named lead with responsibility for improving access for disabled customers:				
Is the service delivered directly to the public? (Yes/No):				
Please describe the main service channels e.g. online, face to face, phone:				
Question	Yes /No	Comment	Action	Who/when
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.)?				

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 bold 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

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

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?		

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