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

Committee *for* Home Affairs

June 2017

Business Disability Forum

Building disability-smart organisations

Contents

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 readiness for future disability discrimination legislation as both an employer and service provider.

This report for the Committee for Home Affairs 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 publicly available online information about the Committee for Home Affairs' 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 Home Affairs. For example:

- Survey respondents identified that a number of colleagues take a leading role in ensuring that their services areas are accessible to disabled customers.
- The Prison Service has a Diversity Strategy (which includes disability) and two members of staff have a specific remit for diversity issues as part of their overall roles.
- The Fire and Rescue Service has trained Health Visitors to identify potential fire risks when they visit disabled or older residents and to make referrals (with the resident's consent) for a fire safety check.

Confidence among survey respondents that their service area is currently meeting the needs of disabled customers was relatively high (3.2 out of 5) and some areas for improvement have been identified. For example:

- Disabled people are not routinely involved in the design or review of services in order to ensure that they are accessible.
- The extent to which external communication methods are made inclusive and accessible as possible to disabled service users appears inconsistent.
- Three out of five survey respondents indicated that ICT is not inclusive and accessible to disabled service users.

Appendix B contains a recommended Disability Action Plan for the Committee for Home Affairs. 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 Home Affairs assume overall responsibility for the plan.

Key recommendations include:

- Identify a named lead within each service area with responsibility for leading work on meeting the needs of disabled customers.
- Ensure that where services are delivered directly to the public, disabled people are involved in the development and review of those services.
- Review key communication channels (such as web and phone) to ensure that they are accessible to disabled users.
- Provide IT leads with information and guidance developed by BDF's Technology Taskforce to help ensure that technology is inclusive for disabled customers.

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'[1].

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.

   Eight respondents indicated that they worked under the Committee for Home Affairs, covering the following service areas:

   - Prison
   - Probation
   - Fire
   - Police

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[1] '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 Home Affairs was held on 22 March and was attended by and was attended by nine nominated representatives from the Committee.

3. A focus group was held with members of the Guernsey Disability Alliance (GDA) in the evening of 21 March, 2017. The primary aim of the focus group was to develop a greater understanding of the GDA's members' views on the key barriers to inclusion relating to the States' various services and how these might be improved.

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

4. A review of customer-related information on the States of Guernsey and Signpost.gg websites and the following service-specific websites:

   - Guernsey Police (website[2] and Facebook page)
   - Fire and Rescue Service Facebook page

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.

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[2] http://www.guernsey.police.uk/

Analysis of disability performance: Committee for Home Affairs

Survey respondents were asked to rate how confident they were that their service area is currently meeting the needs of disabled customers. The eight responses to this question indicated relatively high levels of confidence with an average score of 3.2 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 Home Affairs.

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

1. Commitment	2. know-how	3. Understanding disabled customer need
4. Suppliers and partners	5. Communication	6. Premises
	7. ICT	
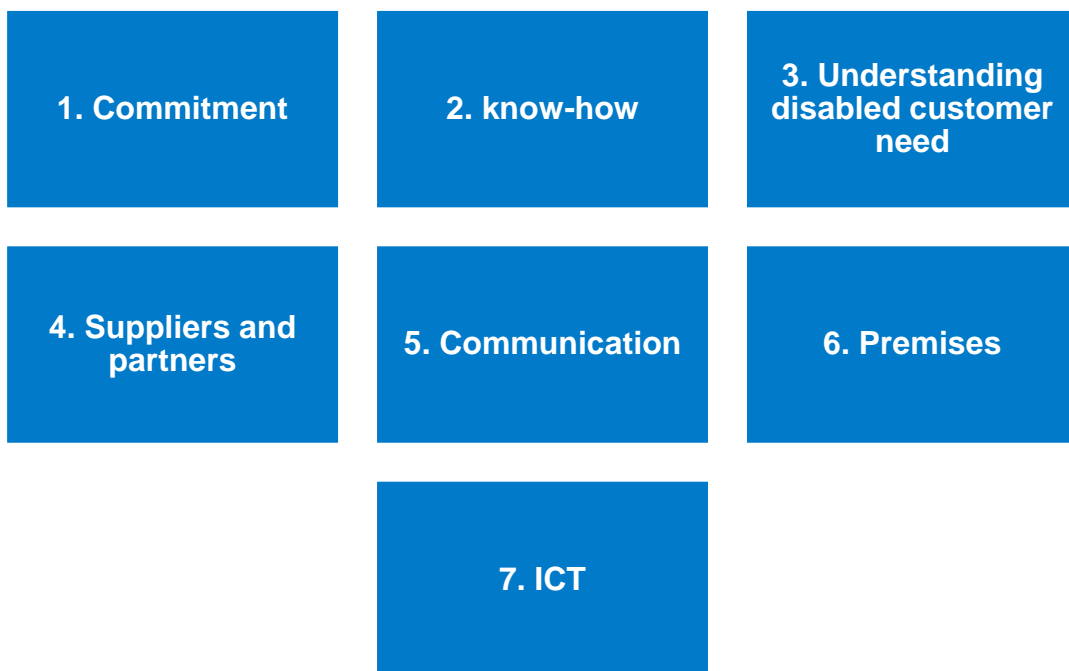
Assessing when disability is relevant to a particular service area

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

- Housing Control (Now Population Management Office)
- Joint Emergency Services Control Centre
- Prison Service
- Probation Service
- Registrar-General of Electors
- Trading Standards
- Fire and Rescue Service.

Given the varied nature of the service areas that sit underneath each Principal Committee, including the Committee for Home Affairs, 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 actioned.

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 Home Affairs.

1. Commitment

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

A review of the Guernsey Fire & Rescue Service's Operating Plan for 2017 identified a public commitment to delivering an inclusive service:

'We value diversity in the Service and the community by treating everyone fairly and with respect, providing varying solutions for different needs and expectations, promoting equal opportunities in employment and progression within the Service and challenging prejudice and discrimination[3]'

This is good practice. The Fire and Rescue Service and other service areas under the Committee for Home Affairs might also consider developing public commitments that specifically reference meeting the needs of disabled islanders. During our wider review work, a review of the Guernsey Museums and Galleries website identified the following example:

'Guernsey Museums and Galleries is committed to making its sites as accessible and inclusive as possible for all users. We strive to remove any barriers to access whether physical, emotional, cultural, financial or otherwise'[4].

During the workshop, all participants expressed a commitment to meeting the needs of disabled islanders. One participant reported that the Prison Service operates with 'a philosophy that seeks to find a way to include everyone (including staff, prisoners and visitors) regardless of the barriers faced'.

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.

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[3] https://www.gov.gg/CHttpHandler.ashx?id=107234&p=0 (accessed 07/05/17)

[4] http://www.museums.gov.gg/CHttpHandler.ashx?id=90463&p=0

Question seven of the service leads survey asked respondents if is there a designated senior individual with responsibility for leading work on meeting the needs of disabled users of their service area. Six out of eight respondents answered positively and the following three colleagues were identified by respondents as leading on meeting the needs of disabled customers:

- Carolyn Barrett, Healthcare Manager
- Louis Arkle, Deputy Governor
- Trevor Queripel, Deputy Chief Fire Officer

It is positive that these colleagues are viewed as playing a lead role in improving the accessibility of their service areas and we were pleased to learn that diversity and inclusion is a formal part of two employees' role descriptions within the Prison Service.

We recommend that the Committee for Home Affairs' senior leadership ensures that each service area (where relevant) has a nominated lead who is responsible for leading work on improving provision for disabled users of their service. To ensure that work is targeted and consistent, we recommend that the lead uses the audit and action planning tool that we have developed in Appendix C to begin to measure and improve the performance of the service.

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, five out of eight respondents indicated that a disability-related plan exists.

Our review identified some positive examples:

- The Home Affairs Delivery Plan 2015-2018 contains an action relating to the Disability and Inclusion Strategy to 'lead the development of policies and procedures for the safeguarding of adults at risk in conjunction with key stakeholders'[5].
- The Prison Service has a diversity strategy (which includes disability).
- It was reported that the Supported Living and Ageing Well strategy has meant that routinely carrying out fire risk assessments in people's homes, is a priority for the Fire and Rescue Service because of the strategy's aim to ensure that older, and disabled residents, can live at home for as long as possible.

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[5] Home Affairs Delivery Plan 2015-2018 (accessed 02/05/17)

Given the strategic importance of the Disability and Inclusion Strategy to the States of Guernsey, we recommend that senior leads from the Committee for Home Affairs ensure that all relevant service areas develop specific plans or amend existing plans to ensure that they include actions relating to improving provision for disabled customers. Service area leads might find the audit and action planning tool in Appendix C a useful means of identifying actions.

A number of workshop participants commented that resources would be required to carry out more work to improve disability practice. This is a consistent theme from our work with the other Principal Committees where colleagues have noted a tension between a genuine desire to improve disability performance and a lack of resources to invest in specific initiatives.

Key recommendations for the Disability Action Plan:

- Identify a named lead within each service area with responsibility for leading work on meeting the needs of disabled service users.
- Ensure that each service area develops a public commitment to providing a service as inclusive and accessible to disabled islanders as possible.
- Ensure that service area leads use the audit and action planning tool in Appendix C to begin to measure and identify improvements with regard to the disability performance of their service area.
- Ensure that each service area develops disability-specific plans or amends existing customer-related plans or strategies to include reference to meeting the needs of disabled islanders.

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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, all eight respondents indicated that colleagues are confident. Workshop participants reported the following examples of good practice:

- All new Prison Officers are trained and existing officers are given refresher training on disability issues, including dementia and manual handling.

- The leadership of the Fire and Rescue Service have mandated that all employees undergo the States of Guernsey's online disability awareness training6. One workshop participant reported that this has led to noticeable changes in practice. For example, it was reported that the Fire and Rescue Service's staff survey was produced in an alternative format (not just online) as a result of increased awareness about the needs of disabled staff.

- The Fire and Rescue Service has provided training for Health Visitors to help them identify potential hazards or fire risks when they visit disabled or older residents. Where risks are identified, the Health Visitor can make a referral for a Fire Safety Officer to visit the resident, with the resident's permission.

This is positive practice and we recommend that all service area leads review the extent to which front-line employees have access to training and guidance to enable them to confidently meet the needs of the disabled islanders they are serving. It is important to note that training should address the specific disability-related components of a particular role. For example, the skills required by a call hander in the Joint Emergency Services Control Centre in order to take calls from disabled people will be very different to the skills required by a Prison Officer in order to move or restrain a disabled prisoner.

Key recommendations for the Disability Action Plan:

- Promote the States of Guernsey's free online disability awareness training to all public-facing employees working within the Committee for Home Affairs' service areas and monitor take up.
- Commission training and/or guidance that includes a focus on meeting the needs of customers as they relate to accessing specific service areas. For example, disability smart call handling for colleagues working in the Joint Emergency Services Control Centre.

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[6] https://training.disabledgo.com/auth/register/states-of-guernsey

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. All eight responses were positive. During the workshop, the following examples of good practice were identified:

- In anticipation of the varying needs of disabled and older islanders, the Fire and Rescue Service regularly undertakes home fire risk assessments for individual residents and provides advice and guidance on tailored home solutions. For example, home fire sprinkler systems or flashing alarms for residents who are deaf or hard of hearing.

- The Joint Emergency Services Control Centre stores relevant data about disabled residents to ensure that their specific circumstances are understood and accounted for in the event of an emergency. For example, if a resident has equipment for oxygen therapy in their home or if they are unable to get out of bed unassisted. It was reported by workshop participants that this data is shared with emergency services when necessary.

- The Fire and Rescue Service support local businesses to anticipate the needs of their disabled employees and customers by provided guidance on emergency evacuation procedures.

- In order to understand the needs of individual prisoners, the Prison Service carries out medical and educational assessments on all new prisoners.

Involving customers with disabilities

In a question about whether disabled people are involved in the development of services, five out of eight respondents indicated that disabled people are involved. This suggests there is a need to review the extent to which disabled people are involved in the designing of new services and the review of existing ones. Survey respondents identified the following examples of good practice:

- The prison has conducted a disability survey which resulted in the development of an action plan.

- A survey respondent noted that 'all policies and procedures consider the impact of all minority strands which includes disability'. Working with disabled employees and customers to understand the impact that policies, procedures and decisions about organisational change may have on them is good practice. A number of participants in workshops with other Principal Committees suggested that Equality Impact

Assessments should be routinely carried out to ensure that the needs of disabled people (and other groups) are routinely considered in relation to policy, procedure and organisational change. This is a recommendation that BDF would support as we work with many public sector organisations in the UK for which equality impact analysis forms an integral part of the decision making process.

Monotoring complaints

In addition to involving disabled customers in service design and review, leading BDF members also review complaints to assess whether any are disability-related. This is a practice that we would recommend that relevant service areas under the Committee for Home Affairs also adopt. Where disability-related complaints are identified, these should feed directly in to service improvement.

Key recommendations for the Disability Action Plan:

- Ensure that where services are delivered directly to the public that disabled people are routinely involved in the development and review of those services.
- Develop a consistent approach to equality impact assessment that ensures the needs of disabled islanders are always considered in relation to key customer-related policies and procedures.
- Review complaints received about services that are delivered directly to the public to assess whether any are disability-related. Where complaints are received, ensure that these feed directly into service improvement.

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4. Suppliers and Partners

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

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?

Four respondents indicated that this question was not applicable to their service area. Of the remaining four, three indicated that suppliers were required to demonstrate disability competence and one indicated that they are not.

Although workshop participants did not identify specific examples of suppliers delivering elements of services directly to the public, it is advisable that relevant leads from the Committee for Home Affairs review the extent to which third parties do interact with service users. Common examples include outsourced reception or security staff.

Where suppliers are identified, 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.

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 Home Affairs.
- Where elements of the Committee for Home Affairs' 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 disabled customers.

5. Communication

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

Survey respondents were asked if they ensure that external communication methods are as inclusive and accessible as possible to disabled service users. Four of the eight responses to this question were positive and the other four were negative.

Given these mixed responses, it is advisable that leads from the Committee for Home Affairs' 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 main site is beyond the control of individual service areas, our review did identify that some services have their own websites.

In order to enable ease of use by users with visual impairments and other disabilities, websites should be built to recognised standards of accessibility (specifically, the Web Content Accessibility Guidelines[7]). Where websites have been designed to such standards, it is common practice to reference this on the site. An example can be found on the Visit Guernsey website which contains the following accessibility statement:

'Visit Guernsey is committed to ensuring that its website is accessible to everyone, including people with disabilities. Accessibility guidelines have been an integral part of the design and development process from the outset. We have taken all steps possible to make sure this website is accessible to all'[8].

A technical audit of the States' various customer-facing websites is outside the remit of our work; however a high level review of the Guernsey Police[9] website identified no such reference. It is advisable therefore that colleagues responsible for the Guernsey Police (any other relevant websites) confirm that sites have been designed to be accessible or commission an audit to identify how accessibility might be improved for disabled users.

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[7] http://www.w3.org/TR/WCAG20/

[8] http://www.visitguernsey.com/content/accessibility (accessed 14/04/17)

[9] http://www.guernsey.police.uk/article/5316/Home

Virtual communications

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

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

For example, it is important that nothing is conveyed in a post using an image alone as users with a visual impairment will be unable to access the information using screen reader technology which reads out written information. A high level review of the Fire and Rescue Service's Facebook feed identified an example of information regarding how to request a carbon monoxide tester uploaded as an image without any supporting explanatory text[10].

Contact provision

Given the vital role played by the Committee's 'blue light' services, it is essential that contact provision enables ease of access for disabled islanders.

This means that:

- Call routing should be as accessible as possible. Call routing options can prevent some disabled callers from accessing services via the phone. For example, if the system does not default to an operator if no option is chosen from a menu[11].
- Callers should be offered a range of contact options. A review of the Guernsey Police website identified that provision has been made for islanders who are deaf or hard of hearing or have a speech impairment to contact emergency services using SMS text messaging[12].
- Call handlers should be trained to ensure they are confident and knowledgeable when handling calls from disabled callers.

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[10]

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

[11] BDF can provide the States with a briefing 'Top tips for disability-smart call handling'

[12] http://www.guernsey.police.uk/article/5339/Contact-Us

Hard copy information

Brochures, forms and other documents can disadvantage disabled users if information is overly complicated and accessible design guidelines are not followed. Appendix D contains a checklist for producing accessible information that service leads from the Committee for Home Affairs might like to review, to help ensure that written materials and any other information meets minimum standards of accessibility.

Key recommendations for the Disability Action Plan:

- Review contact provision to ensure it is designed to meet the needs of disabled customers.
- Review hard copy and virtual communications to ensure they are designed to meet the needs of disabled customers.
- Ensure that social media content provided by the Fire and Rescue Service, Guernsey Police and any other service areas under the Committee for Home Affairs follow good practice guidelines regarding accessibility.

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6. Premises

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

Seven out of eight survey respondents answered positively to a question which asked if premises are inclusive and accessible to disabled service users.

In addition, our review identified that although the prison is around 25 years old and therefore not completely accessible, workshop participants reported that it has cell accommodation which can be adapted to meet the needs of disabled prisoners. In addition, it was reported that work is currently underway to improve accessibility for a range of prisoners including those who are older, those on the autistic spectrum or who have a mental health condition.

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

- 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 Home Affairs with the basis for developing a detailed understanding of the accessibility of its public service-related buildings13.
- 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 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.

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[13] http://www.disabledgo.com/organisations/guernsey/main-2

Key recommendations for the Disability Action Plan:

- Develop a clear understanding of the accessibility of the Committee for Home Affairs' public facing buildings.
- Where buildings are inaccessible, develop realistic and proportionate plans to remove or avoid barriers.
- Ensure that customer-facing staff are trained to recognise when a customer might need support using the building and be proactive in offering support.

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. Three respondents felt that this question was not applicable to them. Of the five applicable responses, two respondents indicated that ICT is accessible and three respondents indicated that it is not.

This mix of responses suggests that ICT leads from across the Committee for Home Affairs should review the extent to which ICT is designed to meet the needs of disabled customers. 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 accessibility[14].
- 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 procurement[15].

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 Home Affairs may also find the resources of value.

Key recommendations for the Disability Action Plan:

- Provide IT leads working for the Committee for Home Affairs with information and guidance developed by BDF's Technology Taskforce.

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[14] http://www.businessdisabilityforum.org.uk/membership/technology-taskforce/accessible-technology-charter/

[15] https://members.businessdisabilityforum.org.uk/resource-category/resource/accessible-technology-charter-accessibility-maturity-model/

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 Home Affairs. For example:

- Survey respondents identified that a number of colleagues take a leading role in ensuring that their services areas are accessible to disabled customers.
- The Prison Service has a Diversity Strategy (which includes disability) and two members of staff have a specific remit for diversity issues as part of their overall roles.
- The Fire and Rescue Service has trained Health Visitors to identify potential fire risks when they visit disabled or older residents and to make referrals (with the resident's consent) for a fire safety check.

Confidence among survey respondents that their service area is currently meeting the needs of disabled customers was relatively high (3.2 out of 5) and some areas for improvement have been identified. For example:

- Disabled people are not routinely involved in the design or review of services in order to ensure that they are accessible.
- The extent to which external communication methods are made inclusive and accessible as possible to disabled service users appears inconsistent.
- Three out of five survey respondents indicated that ICT is not inclusive and accessible to disabled service users.

Appendix B contains a recommended Disability Action Plan for the Committee for Home Affairs. 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 Home Affairs assume overall responsibility for the plan.

Key recommendations include:

- Identify a named lead within each service area with responsibility for leading work on meeting the needs of disabled customers.
- Ensure that where services are delivered directly to the public that disabled people are involved in the development and review of those services.
- Review key communication channels (such as web and phone) to ensure that they are accessible to disabled users.
- Provide IT leads with information and guidance developed by BDF's Technology Taskforce to help ensure that technology is inclusive for disabled customers.

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 Home Affairs

Recommendation	Page	Lead	Timeframe	Priority
Commitment				
1. Identify a named lead within each service area that has responsibility for leading work on meeting the needs of disabled users of their service.	11			High
2. Ensure that each service area develops a public commitment to providing a service that is as inclusive and accessible to disabled islanders as possible.	11			Medium
3. Ensure that service area leads use the audit and action planning tool in Appendix C to begin to measure and identify improvements with regard to the disability performance of their service area.	11			Medium
4. Ensure that each service area develops disability-specific plans or amends existing customer-related plans or strategies to include reference to meeting the needs of disabled islanders.	11			Medium
Know-how				
5. Promote the States of Guernsey's free online disability awareness training to all public-facing employees working within the Committee for Home Affairs' service areas and monitor take up.	12			High

Recommendation	Page	Lead	Timeframe	Priority
6. Commission training and/or guidance that includes a focus on meeting the needs of customers as they relate to accessing specific service areas. For example, disability smart call handling for colleagues working in the Joint Emergency Services Control Centre.	12			Medium
Understanding the needs of disabled customers				
7. 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
8. Develop a consistent approach to equality impact assessment that ensures the needs of disabled islanders are always considered in relation to key customer-related policies and procedures.	14			Medium
9. Review complaints received about services that are delivered directly to the public to assess whether any are disability-related. Where complaints are received, ensure that these feed directly into service improvement.	14			Medium
Suppliers and Partners				
10. Review the extent to which third parties deliver elements of public service on behalf of the Committee for Home Affairs.	15			Medium
11. Where elements of the Committee for Home Affairs' 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 disabled customers.	15			High (If suppliers identified)

Recommendation	Page	Lead	Timeframe	Priority
Communication				
12. Review contact provision to ensure it is designed to meet the needs of disabled customers.	18			High
13. Review hard copy and virtual communications to ensure they are designed to meet the needs of disabled customers.	18			Medium
14. Ensure that social media content provided by the Fire and Rescue Service, Guernsey Police and any other service areas under the Committee for Home Affairs follow good practice guidelines regarding accessibility.	18			Medium
Premises				
15. Develop a clear understanding of the accessibility of the Committee for Home Affairs' public facing buildings.	20			High
16. Where buildings are inaccessible, develop realistic and proportionate plans to remove or avoid barriers.	20			High
17. Ensure that customer-facing staff are trained to recognise when a customer might need support using the building and be proactive in offering support.	20			Medium
Information and communication technology				
18. Provide IT leads working for the Committee for Home Affairs with information and guidance developed by BDF's Technology Taskforce	21			High

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?		

Is your visual alarm system in good working order?		

Management or Training Considerations

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

Comments