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

Committee for Economic Development

May 2017



Contents

Exe	ecutive summary	2
Int	roduction	4
An	alysis of disability performance	7
1.	Commitment	9
2.	Know-how	11
3.	Understanding the needs of disabled customers	13
4.	Suppliers and Partners	14
5.	Communication	16
6.	Premises	18
7.	Information and Communication Technology (ICT)	21
Со	nclusion and key recommendations	23
Ар	pendix A: States of Guernsey service leads survey	24
Ар	pendix B: Recommended Action plan	29
Ар	pendix C: Audit and action planning tool for individual service	areas
		33
Ар	pendix D: Accessible communications checklist	35
Ар	pendix E: Premises Accessibility Checklist	37

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 Economic Development 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 Economic Development'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 Economic Development. For example:

- Two survey respondents were able to identify leads with responsibility for leading improvements for disabled customers within their own service area.
- There is an awareness of the link between aging and disability and a willingness to make adjustments for older customers within the Guernsey Registry Service.
- The Guernsey Tourism Strategic Plan (2015–2025) contains an action to position Guernsey as an accessible tourist destination.
- Work is underway to improve the accessibility of the Guernsey Information Centre

Although confidence among survey respondents that their service area is currently meeting the needs of disabled customers was relatively high (3.4 out of 5), a number of areas for improvement have been identified. For example:

- Three out of five survey respondents said they did not ensure that external communication methods are as inclusive and accessible as possible to disabled service users.
- The experiences of disabled customers do not routinely inform service design and delivery. For example, only one survey respondent felt that a question about whether disabled people are involved in the development of services was applicable to their work, and they provided a negative response.

Appendix B contains a recommended Disability Action Plan for the Committee for Economic Development. 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 Economic Development 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 where services are delivered directly to the public that disabled people are involved in the development and review of those services.
- Review hard copy and virtual communications to ensure they are designed to meet the needs of 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 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.

Six respondents indicated that they worked under the Committee for Economic Development, covering the following services:

- Marketing & Tourism
- Civil Aviation
- Guernsey Registry
- Visitor Survey & Cruise Pier
- Guernsey Information Centre

¹ 'A framework for public service reform 2015-2025' page 3. <u>https://www.gov.gg/CHttpHandler.ashx?id=97310&p=0</u> (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 Economic Development 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 Economic Development and the Committee for Environment and Infrastructure.

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 was undertaken as well service-specific websites, specifically the websites for:
 - Visit Guernsey²
 - Guernsey Registry³

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.

² <u>www.visitguernsey.com</u>

³ www.guernseyregistry.com

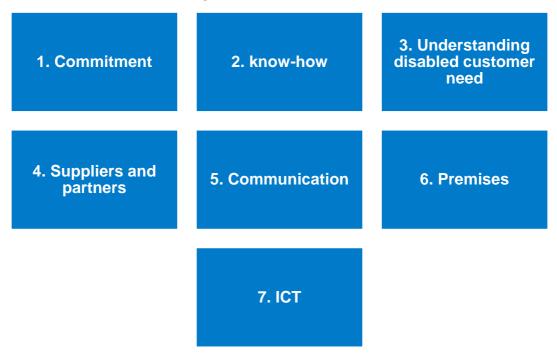
Analysis of disability performance: Committee for Economic Development

Survey respondents were asked to rate how confident they were that their service area was currently meeting the needs of disabled customers. Of the five responses to this question, there was a spread of confidence ratings, with an average score of 3.4 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 Economic Development.

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 Economic Development:

- Broadcasting Services
- Business, Innovation and Skills
- Civil Aviation Office
- Finance Sector Development
- Marketing and Tourism
- Sea Fisheries

Given the varied nature of the service areas that sit underneath each Principal Committee, including the Committee for Economic Development, 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 Economic Development.

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 is there a designated senior individual who has responsibility for leading work on meeting the needs of disabled users of their service. Two of the six respondents indicated that there is a designated lead and gave the following names:

- Alan Bougourd, Registrar
- Guillaume Saunal, Principal Assistant to Chief Executive

It is positive that these colleagues are viewed as playing a lead role in improving the accessibility of their specific services, although we were unable to verify the extent of their responsibilities in this regard. We recommend that the Committee for Economic Development's 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 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. During the workshop, delegates identified the following rationale for improving disability performance:

- Increasing tourism revenue by ensuring that Guernsey is as accessible to the greatest number of visitors possible. A review of the Guernsey Tourism Strategic Plan (2015–2025) identified that improving access for disabled tourists could be worth up to £1.1m to Guernsey's economy.
- The ageing population. One workshop participant reported that the organisational 'mindset' with regard to accessibility is changing in response to the ageing population. This was supported by one workshop participant who commented that a focus on access at the Guernsey Registry is driven mainly by the need to accommodate the access requirements of older company directors.

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, only two out of six survey respondents indicated that this was relevant to their service. Of the two applicable responses, only one indicated awareness of a plan.

During the workshop, one participant suggested that 'Guernsey position itself as a disability friendly island to attract new business and tourists' and another suggested that disability is included within the tourism strategy. A review of the Guernsey Tourism Strategic Plan (2015–2025) identified that an action to become an 'Accessibility friendly island' already exists. This is a positive example of ensuring that disability is included within existing strategies and we would encourage the Committee for Economic Development to consider whether disability-related objectives might be included within other existing plans or strategies.

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 action contained within the Guernsey Tourism Strategic Plan (2015–2025).

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. Three of the six respondents felt that this question was applicable to their service. Responses suggested that employees are confident in relation to meeting the needs of disabled cruise and registry customers but not of those using the Guernsey Information Service.

Workshop participants stated that their thinking on customers and disability was more focused on mobility issues and access to premises with one participant suggesting that they would value 'more training on how to deal with people with less visible disabilities'.

Other queries were raised in terms of how to know when:

- A condition constitutes a disability. The example was given of an airline passenger who is obese; to what extent should an airline accommodate a request to sit in a particular seat from someone if the additional weight would impact on the safety of other passengers.
- It is not reasonable to provide support. One participant suggested that there is currently no framework or process for 'pushing back'.

The group were aware of the online disability awareness training that the States has developed and several participants had undertaken the training. In addition, a review of the Disability and Inclusion Strategy Highlight Report for the period to 23/3/17 indicated that the Marketing and Tourism department have shared the online training with restaurants and accommodation providers⁴. This is positive practice and demonstrates the value of making the training publically available.

The example relating to the airline passenger highlights the range of customer scenarios that the States might need to accommodate, and that the knowledge requirements of customer-facing colleagues will vary depending on the nature of the service. With this in mind, it is advisable that the Committee for Economic Development considers commissioning training and/or guidance that addresses the specific disability components of all service areas where services are delivered directly to the public.

⁴ <u>http://www.signpost.gg/CHttpHandler.ashx?id=106816&p=0</u> (accessed 15/05/17)

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 Economic Development's service areas and monitor take up.
- Consider commissioning training and/or guidance that addresses the specific disability components of public-facing service areas, including the Guernsey Information Centre.

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 four of the applicable responses were positive.

Workshop participants discussed how disability-related data might be used to aid planning. One participant recommended that the State's 'needs to design services based on evidence and statistics rather than on ad hoc media driven requests'. 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.

In a question about whether disabled people are involved in the development of services, only one survey respondent felt this was applicable to their work, and provided a negative response. This is surprising when viewed in the context of survey respondents' higher than average level of confidence (3.4 out of 5) that service areas are currently meeting the needs of disabled customers.

In order to ensure that the Committee of Economic Developments' services meet the needs of disabled islanders, is vital that where services are provided directly to the public, that disabled people are consulted in the design and review of services. In other workshops, a number of services leads working under other Committees shared examples of consulting with organisations like the Guernsey Disability Alliance in order to understand the views and experiences of disabled customers.

In addition to involving disabled customer 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 Economic Development 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 Economic Development in order to inform service planning.
- Ensure that where services are delivered directly to the public that disabled people are involved in the development and review of those services.
- 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 and understanding and ability to meet the needs of a disabled customers.

The survey asked respondents, '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 is a vital consideration because while outsourced elements of service delivery fall outside the organisation, the legal, reputational and financial risks of poor disability practice do not.

Five out of six survey respondents felt this question was not applicable to them, and the remaining person did not respond. This suggests that there public services elements of the Committee for Economic Development are not outsourced.

During the workshop, one participant noted that whilst the States' Marketing and Tourism function does not outsource to hotels, they are 'in our world'. Similarly, it was noted that more information about the accessibility of hotels and other tourist/nature attractions including options for 'island hopping' would improve the visitor and user experience and could be a potential selling point.

These examples demonstrate the value in thinking about suppliers and partners in broad terms. One positive example of good practice in this area has already been identified in this report, specifically the dissemination of the States' free online disability awareness training to local restaurants and accommodation providers.

A further example of good practice identified during the workshop was the commissioning of DisabledGo to audit entertainment, cultural and leisure venues. The result of the audits are publically available in order to assist disabled visitors understand the accessibility of key attractions⁵. This is particularly welcome as one workshop participant suggested that the States might do more to 'communicate disability friendly attractions and facilities more effectively'.

⁵ http://www.disabledgo.com/organisations/guernsey/main-2

Key recommendations for the Disability Action Plan:

- Review whether any third parties deliver elements of public service on behalf of the Committee for Economic Development.
- If elements of the Committee for Economic Development'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 customer.
- Continue to promote the States of Guernsey's free disability awareness online training to organisations working in the tourism sector and monitor take up.
- Ensure that customer-facing staff working for the Guernsey Information Centre are familiar with the information about the accessibility of entertainment, cultural and leisure venues on the DisabledGo website.

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. Of five applicable responses, three were negative. This is concerning as inaccessible information might impact negatively on the ability of disabled tourists' to find information about key attractions or limit disabled users of registry services to read and understand key information.

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

- Websites. A review of the Visit Guernsey website identified an example of positive practice. The site contains an accessibility statement which states that '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 web site is accessible to all'6. We did not find any information about accessibility on the Guernsey registry's site.
- Contact provision (phone and/or online). For example, 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.7
- 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.
- Hard copy information. For example, promotional materials, forms and other documents can disadvantage disabled users if information is overly complicated and accessible design guidelines are not followed.

⁶ <u>http://www.visitguernsey.com/content/accessibility</u> (accessed 14/04/17)

⁷ BDF can provide the States with a briefing 'Top tips for disability-smart call handling'

The accessibility of forms was raised in the workshop. One participant noted that some older users of the Guernsey Registry found completing forms difficult due to either the accessibility of the form (for example, font size) or the complexity of the language used. One participant noted that best practice guidance in addition to central communication templates and guidance would be useful. Appendix D contains a checklist for producing accessible information.

Another workshop participant highlighted the challenge of supporting a customer to complete paperwork if they may have a disability which affects their mental capacity. Following good practice guidelines with regard to producing accessible information should make it easier for some disabled customers however, it is important that staff are equipped with guidance and training to ensure they are able to offer appropriate support where a service user's disability might impact on their mental capacity.

On a more general note, 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 Economic Development's service areas were not identified by participants as being particularly problematic, this demonstrates the potentially negative impact of inaccessible communications.

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 underway⁸. We hope that learning from this exercise is shared with other services under the Committee for Economic Development.

Key recommendations for the Disability Action Plan:

- Review key communication channels (e.g. phone and online) to ensure they are 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.
- Develop training and guidance to help customer-facing staff meet the needs of customers who may lack mental capacity, especially with regard to the State's registry service.

⁸ http://www.signpost.gg/CHttpHandler.ashx?id=107652&p=0

6. Premises

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

Only three out of six survey respondents indicated that a question about the accessibility of public facilities was applicable to them, although all responses were positive. One survey respondent commented that 'provision is made as far as possible within the constraints of budget availability and physical building/office space limitations'.

Workshop participants however, felt that the accessibility of some buildings was a major issue. Participants noted that many of the State's 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. 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 Economic Development with the basis for building a detailed understanding of the accessibility of its public service-related buildings.
- Where buildings are inaccessible, developing plans to remove known barriers 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 or Training considerations in relation to the accessibility of a building.

The accessibility of Albert Pier and the Guernsey Information Centre were identified as areas of concern. For example, one survey respondent commented that facilities on Albert Pier 'are not ideal at times'.

During the workshop, specific accessibility challenges were identified with the Guernsey Information Centre. For example, it was reported that:

- There is no step-free access into the front of the building (although access via a ramp is possible at the rear of the building)
- The customer service counter is a 'standing counter' that 'assumes visitors can stand'
- Hard copy information is stored on high shelving

Clearly these issues might impact negatively on the ability of a disabled tourist to access the centre and we were pleased to note in the Disability and Inclusion Strategy Project Highlight Report (No 5) that work has begun to improve access at the Guernsey Information Centre⁹.

Improving access at the Guernsey Information Centre is particularly relevant in light of the States' ambition to become an 'accessibility friendly island', as set out in the Guernsey Tourism Strategic Plan (2015–2025). In addition, a key aim of the Disability and Inclusion strategy is for the States to become an exemplar which means it is important that the Information Centre should serve as an example to the island's attractions.

The Digital Greenhouse¹⁰ (a centre established by the States of Guernsey to act as a focal point for the growth of the digital and creative sector) was highlighted by a workshop participant as an example of what could be achieved with a new build or a significant redesign. The participant noted that the Digital Greenhouse contains a number of accessible features, citing 'talking' lifts as an example. A review of the DisabledGo site, identified that a detailed access audit has been carried out on the Digital Greenhouse. Facilities/website leads for the Digital Greenhouse might consider incorporating this information into the main website as potential disabled customers may not think to look for it on a separate site when booking.

⁹ http://www.signpost.gg/CHttpHandler.ashx?id=107652&p=0

Key recommendations for the Disability Action Plan:

- Develop a clear understanding of the accessibility of the Committee for Economic Development's public facing buildings.
- Where buildings are inaccessible, develop realistic and proportionate plans to remove or avoid barriers (with specific reference to Albert Pier and the Guernsey Information Centre).
- 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.
- Incorporate information about the accessibility of the Digital Greenhouse onto the Digital Greenhouse's main website site.

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. Only two respondents indicated that this question was applicable, although their positive responses suggest that the needs of disabled registry customers and tourists are considered in relation to ICT.

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 forms¹¹.
- 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 Visit Guernsey website (discussed earlier)¹². For example, the site explains:

'If you find the text on this site is too small, you can change it easily in your browser settings. To do this you should simply adjust your browser's settings by going to the Tools menu, selecting 'text size', 'text zoom' or 'zoom' and increasing the size of the text.'

¹¹ www.rnib.org.uk/sites/default/files/Creating%20accessible%20forms.docx

¹² <u>http://www.visitguernsey.com/content/accessibility</u> (accessed 14/04/17)

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 accessibility¹³.
- 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 procurement¹⁴.

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 Economic Development 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 Economic Development 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 Economic Development with information and guidance developed by BDF's Technology Taskforce.

¹³ http://www.businessdisabilityforum.org.uk/membership/technology-taskforce/accessible-technology-charter/

¹⁴ 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 Economic Development. For example:

- Two survey respondents were able to identify leads with responsibility for leading improvements for disabled customers within their own service area.
- There is an awareness of the link between ageing and disability and a willingness to make adjustments for older customers within the Guernsey Registry Service.
- The Guernsey Tourism Strategic Plan (2015–2025) contains an action to position Guernsey as an accessible tourist destination.
- Work is underway to improve the accessibility of the Guernsey Information Centre.

Although confidence among survey respondents that their service area is currently meeting the needs of disabled customers was relatively high (3.4 out of 5), a number of areas for improvement have been identified. For example:

- Three out of five survey respondents said they did not ensure that external communication methods are as inclusive and accessible as possible to disabled service users.
- Only one survey respondent felt that a question about whether disabled people are involved in the development of services was applicable to their work, and they provided a negative response.

Appendix B contains a recommended Disability Action Plan for the Committee for Economic Development. 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 Economic Development 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 where services are delivered directly to the public that disabled people are involved in the development and review of those services.
- Review hard copy and virtual communications to ensure they are designed to meet the needs of 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
- 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?

Disability review: Committee for Economic Development | June 2017 Appendix B

Recommended Action Plan for Committee for Economic Development

Re	ecommendation	Page	Lead	Timeframe	Priority
Сс	ommitment	1			
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			Medium
3.	Consider whether disability-related objectives might be included within existing customer-related plans or strategies (in addition to the action contained within the Guernsey Tourism Strategic Plan (2015–2025).	10			Medium
Kr	now-how				
4.	Continue to promote the States' free online disability awareness training to all public facing employees working within the Committee for Economic Development's service areas and monitor take up.	12			Medium
5.	Consider commissioning training and/or guidance that addresses the specific disability components of public- facing service areas, including the Guernsey Information Centre.	12			Medium

Recommendation	Page	Lead	Timeframe	Priority
Understanding the needs of disabled customers				
 Ensure that disability-related statistics such as census data is shared with service leads from the Committee for Economic Development in order to inform service planning. 	13			Low
 Ensure that where services are delivered directly to the public that disabled people are involved in the development and review of those services. 	13			High
 Review complaints received about services that are delivered directly to the public to assess whether any are disability-related. 	13			Medium
Suppliers and Partners				
 Review whether any third parties deliver elements of public service on behalf of the Committee for Economic Development. 	16			High
10. If elements of the Committee for Economic Development'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.	15			High
11. Continue to promote the States of Guernsey's free disability awareness online training to organisations working in the tourism sector and monitor take up.	15			Low

Recommendation	Page	Lead	Timeframe	Priority
Suppliers and Partners				
12. Ensure that customer-facing staff working for the Guernsey Information Centre are familiar with the information about the accessibility of entertainment, cultural and leisure venues on the DisabledGo website.	15			High
Communication				
13. Review key communication channels (e.g. phone and online) to ensure they are designed to meet the needs of disabled customers.	17			High
14. Review hard copy and virtual communications to ensure they are designed to meet the needs of disabled customers.	17			High
15. Develop training and guidance to help customer-facing staff meet the needs of customers who may lack mental capacity, especially with regard to the State's registry service.	17			Medium
Premises				
16. Develop a clear understanding of the accessibility of the Committee for Economic Development's public facing buildings.	20			High
17. Where buildings are inaccessible, develop realistic and proportionate plans to remove or avoid barriers (with specific reference to Albert Pier and the Guernsey Information Centre).	20			High
18. 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.	20			High

Disability review:	Committee for	or Economic	Development	June 2017
				30110 2017

Recommendation	Page	Lead	Timeframe	Priority
19. Incorporate information about the accessibility of the Digital Greenhouse onto the Digital Greenhouse's main website site.	20			
Information and communication technology				
20. Ensure that any electronic forms used by public services of the Committee for Economic Development are designed following good practice accessibility guidelines.	22			High
21. Communicate to customers how using in-built accessibility functions can improve access to online forms.	22			Medium
22. Provide IT leads working within the Committee for Economic Development with information and guidance developed by BDF's Technology Taskforce.	22			Medium

Disability review: Committee for Economic Development | June 2017 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 t	he pul	olic? (Yes/No):		
Please describe the main service c	hanne	Is e.g. online, face to fac	ce, phone:	
Question	Yes /No	Comment	Action	Who/when
 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.)?				

Qı	lestion	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
	163	
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	Νο
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?		

le veux vieuel elerre evetere in read working erder?		
Is your visual alarm system in good working order?		

Management or Training Considerations

Question	Yes	Νο
Do all disabled employees have a Personal Emergency Egress Plan (PEEP)?		

Comments

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

Registered charity no: 1018463.

Registered Office: Nutmeg House, 60 Gainsford Street, London SE1 2NY.

Registered in England under Company No. 2603700