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

Committee *for* Employment and Social Security

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

This report for the Committee *for* Employment and Social Security 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* Employment and Social Security'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* Employment and Social Security. For example:

- Staff reported having receiving training on dementia
- Employees within Social Security are happy to work with those supporting an individual claimant such as family members or advocates.

Confidence among survey respondents that their service area is currently meeting the needs of disabled customers 2.5 out of 5 and some areas for improvement have been identified. For example:

- Suppliers are not routinely required to demonstrate the 'disability competence' required in order to meet the needs of any disabled customers who they interact with.
- Disabled people are not routinely consulted in order to understand their experiences of the Committee's services.
- Disabled customers identified the tone and accessibility of letters sent by Social Security and Housing (among other service areas) as being a barrier to effectively engaging with the States of Guernsey.

Appendix B contains a recommended Disability Action Plan for the Committee *for* Employment and Social Security. 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* Employment and Social Security 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 a broad group of disabled people (not only GDA members) are involved in the development and review of those services.

- Liaise with key suppliers in order to ensure they can demonstrate an understanding and ability to meet the needs of disabled customers when delivering elements of the Committee *for* Employment and Social Security's services.

Introduction

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

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

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

This report forms part of a series of reports which focus on the extent to which the needs of disabled islanders are currently considered and actively met in relation to the States many and varied services. In addition to Committee-specific reports, we have also produced an overarching report that summarises our findings, compares performance between Committees and explores broad strategic issues that cut across individual services.

Disability-smart approaches to service provision

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

Key indicators include:

- Organisational values that prioritise improving disability performance
- Improving the skills, confidence and knowledge of customer-facing employees
- Practising inclusive design when developing new services
- The usability and accessibility of key service channels
- The ease with which disabled customers can request and access adjustments to help overcome the barriers they face
- Gaining insight directly from disabled people
- How disability-related customer complaints are recorded, analysed and responded to

Improving service for islanders with disabilities improves things for everyone

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

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

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

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

   12 respondents indicated that they worked under the Committee *for* Employment and Social Security, covering the following service areas:

   - Pensions
   - Employment Relations
   - Housing
   - Health & Safety
   - Complaints
   - Contributions

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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)

- Supplementary Benefit and Policy & Legislation

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* Employment and Social Security was held on 22 March and was attended by and was attended by 11 nominated representatives from the Committee.

   At the request of the States of Guernsey, the workshop was held jointly between the Committee *for* Employment and Social Security and the Committee *for* Economic Development.

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

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

4. A review of customer-related information on the States of Guernsey and Signpost.gg websites and the Health and Safety Executive[2] and the Guernsey Housing Association[3].

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] www.hse.gg

[3] http://www.gha.gg/ website

Analysis of disability performance: Committee for Employment and Social Security

Survey respondents were asked to rate how confident they were that their service area is currently meeting the needs of disabled customers. Of the 11 responses to this question, the average score was 2.5 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* Employment and Social Security.

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	
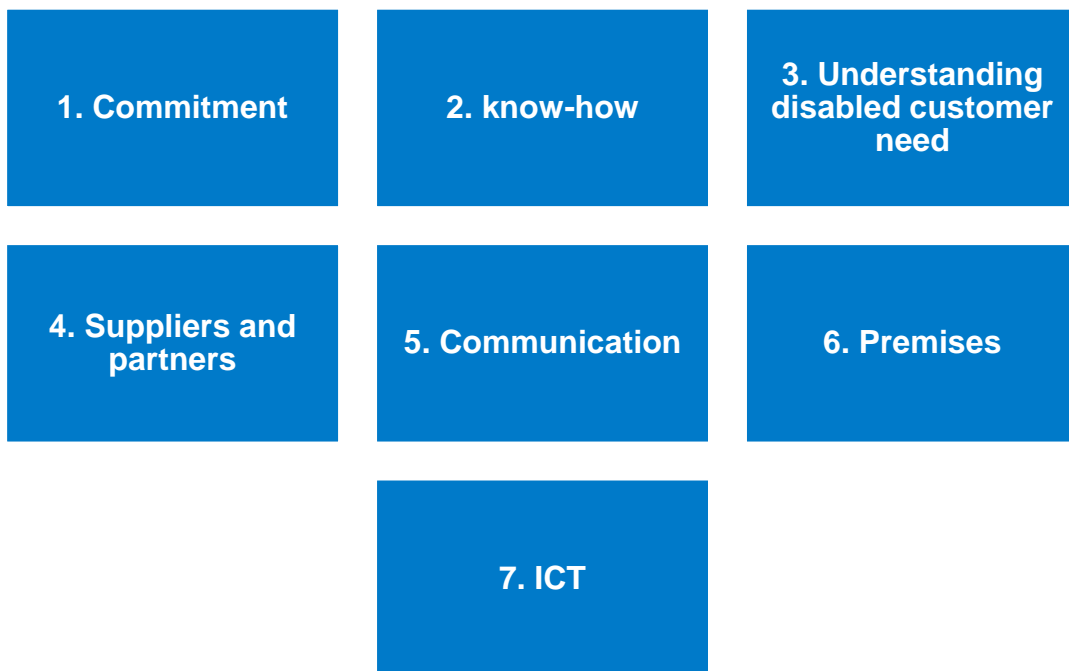
Assessing when disability is relevant to a particular service area

A review of the States of Guernsey's guide on Brand Structure identifies the following service areas as part of the Committee *for* Employment and Social Security:

- Employment Relations Service
- Health and Safety Executive
- Housing
- Prescribing Support Unit
- Social Security

Given the varied nature of the service areas that sit underneath each Principal Committee, including the Committee *for* Employment and Social Security, 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* Employment and Social Security.

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.

One workshop participant suggested that it would be useful for a disability champion to be identified for each committee in order to drive service improvement for disabled customers. This is a recommendation that we would support and set out in our overarching report to the States of Guernsey.

Question seven of the survey for service leads asked respondents if there is a designated senior individual who has responsibility for leading work on meeting the needs of disabled users of their service area. Four out of 12 respondents indicated awareness of a named lead for their service area. One of the "No" respondents nonetheless named Caroline Mullins (Disability Officer) as the disability lead.

Given the strategic importance of disability to the States of Guernsey as set out in the Disability and Inclusion Strategy, we recommend that the Committee *for* Employment and Social Security's senior leadership ensures that, in addition to an overall senior sponsor, each service area (where relevant) has a nominated lead who is responsible for progressing work on improving provision for disabled users of their service. This is especially relevant given the Committee's overall responsibility for Disability and Inclusion strategy.

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

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, six respondents indicated that a disability-related plan exists, four indicated that no plan exists and another two respondents indicated that the question was not applicable.

One workshop participant noted that while there is no disability-related plan, generally employees working in the employment service tend to be more aware of meeting the needs of disabled customers due to the high profile of the Disability and Inclusion strategy within the Committee. A survey respondent offered an alternative view however, stating that there was a lack of awareness of the 'Disability Inclusion Forum'

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 area.
- Ensure that service area leads use the audit and action planning tool in Appendix C to begin to measure and improve the performance of their service area.

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, nine out of 12 respondents indicated that they do ensure that colleagues are confident. As previously noted, workshop participants noted that awareness among colleagues in the Committee *for* Employment and Social Security is generally high (compared to other Committees) because the Committee *for* Employment and Social Security owns the Disability and Inclusion strategy. In addition, workshop participants also reported the following good practice:

- Customer-facing employees had recently undergone training on meeting the needs of customers with dementia.
- A survey respondent noted that their awareness of the gaps in existing arrangements for disabled tenants and other customers had been improved by completing out the survey.

In addition to these positive examples, some areas for improvement were also identified. For example, it was felt that more awareness raising sessions for those in customer facing roles would be beneficial. This was echoed by participants in the Guernsey Disability Alliance (GDA) focus group who suggested that there needs to be better education on the issue of disability to counter balance negative attitudes for example, an assumption that disabled people want to cheat the benefits system.

It is important that any training addresses the specific knowledge requirements of colleagues working in each service area. For example, what a housing officer might need to know about meeting the needs of a disabled tenant will be different to what someone in the job centre needs to know about meeting the needs of a disabled job seeker.

> **Key recommendations for the Disability Action Plan:**
>
> - Commission training for customer-facing employees within the Committee *for* Employment and Social Security that focuses on the specific knowledge requirements of each service area.

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 (e.g. people with a visual impairment, mental health condition etc.) are anticipated. 11 out of 12 survey respondents answered positively to this question.

During the workshop, the team reported that employees working within Social Security were happy to work with those supporting an individual claimant, for example with their family, carers, social workers or key workers. Other participants noted that they had found advocates working on behalf of people with a learning disability were very useful.

Although advocacy was cited as being useful by workshop participants, it was reported that an advocacy service for people with learning disabilities no longer exists. A lack of advocacy was also highlighted as a key gap during a focus group with GDA members. One GDA member commented that 'there is now very little advocacy, only volunteers'. The participant also noted that in the past, advocates would have acted as a source of intelligence to the States of Guernsey regarding the needs of disabled customers.

One way of ensuring that the needs of disabled customers are properly understood is to involve disabled users in the design and review of services. This is an essential requirement. Despite the high number of positive responses in relation to the survey question about anticipating the needs of disabled customers, only two respondents indicated that disabled people are involved in service development. One workshop participant noted that the GDA would sometimes 'step in' because of a lack of a proactive process for formal consultation. In addition, a survey respondent reported that whilst they felt that overall their service was inclusive (on the basis of not having received complaints indicating the contrary), in the absence of specific feedback, it was hard to be sure.

Although it was noted during the workshop that no formal mechanism or process exists for utilising feedback from disabled customers, the group felt it would be relatively straight forward to develop a means of doing so and one that goes beyond only reaching the members of the GDA. This is an important consideration because whilst participants in the GDA focus group welcomed being consulted, they were also keen to encourage the States to find ways of gauging the views and experiences of disabled islanders who are not GDA members.

In addition to involving disabled customers in service design and review, leading BDF members review complaints to assess whether any are disability-related. One workshop participant noted that there is no formal vehicle for obtaining customer feedback apart from logging complaints and compliments. The participant also noted that customers 'shouldn't have to make a formal complaint just to give feedback'.

These examples highlight the importance of developing a means of proactively engaging with disabled customers in order to understand their needs as well as ensuring that complaints procedures allow for analysis of whether complains are disability related. Where complaints are disability-related, these should then feed directly into service improvements.

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.
- Consider ways of widening consultation beyond the membership of the GDA.
- Explore ways of enabling greater access for disabled customers via advocacy.
- Review complaints received about services that are delivered directly to the public to assess whether any are disability-related. Where complaints are disability-related, ensure that they 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 survey respondents indicated that this question was not applicable to them. Of the six applicable responses, two indicated positively and four indicated that suppliers are not required to demonstrate an understanding and an ability to meet the needs of disabled service users. It is vital that the Committee *for* Employment and Social Security ensures that suppliers 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.

A supplementary question asked respondents to indicate the number of suppliers that had a role in providing an element of public service. Although no survey respondents answered this question, workshop participants identified a number of third parties including:

- Travel agents
- Security guards
- Guernsey Housing Association
- St. John's Ambulance
- Maintenance workers for housing

When asked to consider the readiness of suppliers with regard to meeting the needs of disabled islanders, workshop participants reported that they were unsure what training, if any, their staff received and whether the States had any mechanism for checking.

Key recommendations for the Disability Action Plan:

- Review the extent to which third party suppliers deliver elements of public service on behalf of the Committee *for* Employment and Social Security.
- Where elements of the Committee *for* Employment and Social Security'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 disabled customers.

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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. Five respondents indicated that communications were accessible however, six indicated that communications are not.

These survey responses suggests a risk that some service users may be excluded due to inaccessible communication methods. It is advisable therefore that the Committee *for* Employment and Social Security's key service areas review communications to ensure they have been designed with accessibility in mind. This includes:

Websites

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

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

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

As a minimum, customers should be offered a range of contact methods and we were pleased to note that customers with queries are invited to either fill out an online form, phone, email or visit in person. We also noticed that the contact page for Social Security included a link to more detailed information (via the DisabledGo website) about the accessibility of its office[4]. This is excellent practice that we recommend other service areas replicate.

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[4] https://www.gov.gg/article/135138/Contact-Us---Social-Security

Other customer 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[5]). 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'[6].

A technical audit of the States' various customer-facing websites is outside the remit of our work, however a high level review of the websites for the Guernsey Housing Association and the Health and Safety Executive identified no such references.

It is advisable therefore that colleagues responsible for external websites confirm that sites have been designed to be accessible or commission an audit to identify how access might be improved for disabled users.

Contact provision (phone and/or online)

Call routing options can prevent some disabled callers from accessing services via the phone. For example, if the system does not default to an operator if no option is chosen from a menu[7].

Hard copy information

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

It was reported by workshop participants that communications are heavily reliant on print and that text is often set out in a smaller than recommended font size (11 rather than 12 as a minimum). One workshop participant commented that it is common practice to produce leaflets and that while some standard guidelines are available on how to produce these accessibility, these were not consistently applied. Workshop participants suggested that guidance and training on producing accessible information from the States' central communications team would be useful.

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

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

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

It was reported by one workshop participant that the Housing service is very reliant on paper forms. The participant suggested that corporate guidelines would be welcome and the alternative formats should also be made available upon request. Appendix D contains a checklist for producing accessible information that service leads within the Committee *for* Employment and Social Security might like to review to help ensure that forms and any other information meets minimum standards of accessibility.

We were pleased to learn from a review of the Disability and Inclusion Strategy Project Highlight Report (No 5) that an initial scoping exercise around documentation produced for customers at the Income Tax Service is underway[8]. We hope that learning from this exercise is shared with other service areas including those under the Committee *for* Employment and Social Security.

In addition to the accessibility of forms, participants at a focus group for disabled islanders highlighted the tone of the paperwork as a key barrier to engaging with the States. One workshop participant noted that letters sent from the States to the public can be 'brutal, harsh and not personalised'. It was noted that letters frequently use jargon and 'tend to always assume the worst of the recipient'. When asked for examples where improvement was needed, Social Security and Housing were among the service areas identified by participants.

Key recommendations for the Disability Action Plan:

- Ensure that (where available and relevant) all service areas' contact pages contain information about the accessibility of key locations (following the example of Social Security)
- 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 and ensure that all new communications are designed to be accessible.
- Liaise with the States' central communications team to ensure that relevant service areas have guidance on producing accessible information.
- Review the accessibility and tone of forms and letters that are sent to customers.

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[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.

A survey question asked respondents if they ensure that premises are inclusive and accessible to disabled service users. Eight out of 12 respondents indicated that premises are inclusive and accessible to disabled customers.

Despite this positive response, workshop participants identified accessibility at Wheadon House as an area of concern. One participant suggested that access needed to improve as the States wants to encourage people to come into the building. The access audit of Wheadon House carried out by DisabledGo should provide the States' with the basis of a plan for improving access[9].

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* Employment and Social Security with the basis for developing a detailed understanding of the accessibility of its public service-related buildings10.

- 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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[9] http://www.disabledgo.com/access-guide/guernsey/social-security-department-2

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

Key recommendations for the Disability Action Plan:

- Develop a clear understanding of the accessibility of all of the Committee *for* Employment and Social Security's public-facing buildings.
- Where buildings are inaccessible, develop realistic and proportionate plans to remove or avoid barriers. For example, Wheadon House.
- 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.

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 as inclusive and accessible to disabled service users. More than half of applicable responses were negative (five out of nine).

During the workshop, it was reported that the States of Guernsey is moving to a position of being 'digital by default', although no timeline has been agreed. Participants noted that some good practice was already underway as benefit claims can now be made via skype which removes the need for claimants to travel.

It was noted by one workshop participant that in the UK, every service change would be subject to an Equality Impact Assessment to identify whether it might impact negatively on 'protected' groups such as disabled people. It was suggested that this is a particularly important consideration for a policy driver such as digital by default which could cause barriers to people with disabilities or even exclude then altogether.

The importance of carrying out Equality Impact Assessments was also raised by a participant in a workshop with leads from the Committee for Environment and Infrastructure who suggested that the States of Guernsey should adopt a more consistent approach to assessing impact. This is a recommendation that BDF would support and we work with many public sector organisations in the UK for which equality impact analysis forms an integral part of the decision making process.

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[11].
- 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[12].

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

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

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

Key recommendations for the Disability Action Plan:

- Develop a consistent approach to equality impact assessment that ensures the needs of disabled islanders are always considered in relation to key decisions.
- Provide IT leads working within the Committee *for* Employment and Social Security with information and guidance developed by BDF's Technology Taskforce.

Conclusion and key recommendations

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

- Staff reported having receiving training on dementia
- Employees within Social Security are happy to work with those supporting an individual claimant such as family members of advocates.

Confidence among survey respondents that their service area is currently meeting the needs of disabled customers 2.5 out of 5 and some areas for improvement have been identified. For example:

- Suppliers are not routinely required to demonstrate the 'disability competence' required in order to meet the needs of any disabled customers who they interact with.
- Disabled people are not routinely consulted in order to understand their experiences of the Committee's services.
- Disabled customers identified the tone and accessibility of letters sent by Social Security and Housing (among other service areas) as being a barrier to effectively engaging with the States of Guernsey.

Appendix B contains a recommended Disability Action Plan for the Committee *for* Employment and Social Security. 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* Employment and Social Security 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 a broad group of disabled people (not only GDA members) are involved in the development and review of those services.
- Liaise with key suppliers in order to ensure they can demonstrate an understanding and ability to meet the needs of disabled customers when delivering elements of the Committee *for* Employment and Social Security's services.

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* Employment and Social Security

Recommendation	Page	Lead	Timeframe	Priority
Commitment				
1. Identify a named lead within each service area who has responsibility for leading work on meeting the needs of disabled users of their service area.	10			High
2. Ensure that service area leads use the audit and action planning tool in Appendix C to begin to measure and improve the performance of their service area.	10			High
Know-how				
3. Commission training for customer-facing employees within the Committee *for* Employment and Social Security that focuses on the specific knowledge requirements of each service area.	11			Medium
Understanding the needs of disabled customers				
4. Ensure that where services are delivered directly to the public that disabled people are routinely involved in the development and review of those services.	13			High
5. Consider ways of widening consultation beyond the membership of the GDA.	13			Medium
6. Explore ways of enabling greater access for disabled customers via advocacy.	13			Medium

Recommendation	Page	Lead	Timeframe	Priority
7. Review complaints received about services that are delivered directly to the public to assess whether any are disability-related. Where complaints are disability-related, ensure that they feed directly into service improvement.	13			Medium
Suppliers and Partners				
8. Review the extent to which third party suppliers deliver elements of public service on behalf of the Committee *for* Employment and Social Security.	14			High
9. Where elements of the Committee *for* Employment and Social Security'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 disabled customers.	14			High (where suppliers are identified)
Communication				
10. Ensure that (where available and relevant) all service areas' contact pages contain information about the accessibility of key locations (following the example of Social Security)	17			Medium
11. Review key communication channels (e.g. phone and online) to ensure they are designed to meet the needs of disabled customers.	17			High
12. Review hard copy and virtual communications to ensure they are designed to meet the needs of disabled customers and ensure that all new communications are designed to be accessible.	17			High

Recommendation	Page	Lead	Timeframe	Priority
13. Liaise with the States' central communications team to ensure that relevant service areas have guidance on producing accessible information.	17			Medium
14. Review the accessibility and tone of forms and letters that are sent to customers	17			Medium
Premises				
15. Develop a clear understanding of the accessibility of all of the Committee *for* Employment and Social Security's public-facing buildings.	19			High
16. Where buildings are inaccessible, develop realistic and proportionate plans to remove or avoid barriers. For example, Wheadon House.	19			High
17. 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.	19			Medium
Information and communication technology				
18. Develop a consistent approach to equality impact assessment that ensures the needs of disabled islanders are always considered in relation to key decisions.	21			Medium
19. Provide IT leads working within the Committee *for* Employment and Social Security with information and guidance developed by BDF's Technology Taskforce.	21			Medium

Appendix C

Audit and action planning tool for individual service areas

Service area:				
Named lead with responsibility for improving access for disabled customers:				
Is the service delivered directly to the public? (Yes/No):				
Please describe the main service channels e.g. online, face to face, phone:				
Question	**Yes /No**	**Comment**	**Action**	**Who/when**
1. Are public-facing employees are confident interacting with disabled people?				
2. Is there a plan or strategy to improve the accessibility of the service for disabled customers?				
3. Do you anticipate the needs of groups of disabled customers/service users (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. If elements of the 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?				
6. Are external communication methods are as inclusive and accessible as possible to disabled customers?				
7. Are premises inclusive and accessible to disabled customers?				
8. 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