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

States' Trading Supervisory Board

June 2017

Business Disability Forum

Building disability-smart organisations

Contents

Executive summary

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

This report for the States' Trading Supervisory Board forms part of a series of reports which focus on the extent to which the needs of disabled islanders are currently considered and actively met in relation to the States many and varied services.

To this end we:

- Surveyed service area leads
- Held a workshop with service area leads
- Held a focus group with disabled islanders
- Reviewed publicly available online information about the States' Trading Supervisory Board's services.

In summary, our review has identified that some very good work already takes place within the States' Trading Supervisory Board. For example:

- When supporting other Committees with capital construction projects, Property Services will work with them to ensure that proper consideration has been given to accessibility within plans.
- Airport and Harbour staff have liaised with the Guernsey Disability Alliance in order to improve service provision and undertaken disability-related training.
- Guernsey Water has given thought to meeting the needs of 'vulnerable' customers including those with disabilities.

A number of areas for improvement have been identified. For example:

- Few services have nominated leads with responsibility for improving disability performance and there is a lack of specific plans aimed at improving provision for disabled customers.
- Suppliers that provide an element of public service are not routinely required to demonstrate an understanding and ability to meet the needs of disabled customers.
- Some facilities were reported to be challenging with regard to access and, in one instance, inaccessible to disabled customers.
- The communication needs and preferences of disabled customers are not routinely anticipated or accommodated.

Appendix B contains a recommended Disability Action Plan. The actions flow directly from the findings in the report and we recommend that senior colleagues with responsibility for customer service within the States' Trading Supervisory Board assume overall responsibility for the plan. Key recommendations include:

- Identify a named lead within each service area that has responsibility for leading work on meeting the needs of disabled customers.
- Where buildings are inaccessible (for example, the Harbour Office), develop realistic and proportionate plans to remove or avoid barriers.
- Review key communications such as external websites to ensure they are designed to meet the needs of disabled customers, and ensure that new hard copy and virtual communications are designed to be as accessible as possible.
- Where elements of the States' Trading Supervisory Board's public services are delivered by third parties (for example, security at Guernsey Airport), liaise with suppliers to ensure that they can demonstrate an understanding and ability to meet the needs of a disabled customers.

Appendix B contains a recommended Disability Action Plan for the States' Trading Supervisory Board. The actions flow directly from the findings in the report and we recommend that senior colleagues with responsibility for customer service within the States' Trading Supervisory Board assume overall responsibility for the plan.

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 five 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. Seven respondents indicated that they worked under the States' Trading Supervisory Board.

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 Policy and Resources and the States' Trading Supervisory Board was held on 22 March and was attended by eight nominated representatives.

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.

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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)

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 a summary of current disability-related activity compiled by leads from across the States' Trading Supervisory Board submitted to BDF on 6 December 2016.

5. A review of customer-related information on the States of Guernsey and Signpost.gg websites was undertaken as well as service-specific websites. Specifically:

- Guernsey Airport - https://www.airport.gg/
- Guernsey Water - http://www.water.gg/
- Guernsey Dairy - http://www.guernseydairy.com/
- Guernsey Harbours - http://www.harbours.gg/

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 organisations. 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 service area 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.

Analysis of disability performance: States' Trading Supervisory Board

Survey respondents were asked to rate how confident they were that their service area was currently meeting the needs of disabled customers. Of the six responses to this question, there was a spread of confidence ratings, with an average score of 2.6 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 States' Trading Supervisory Board.

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	
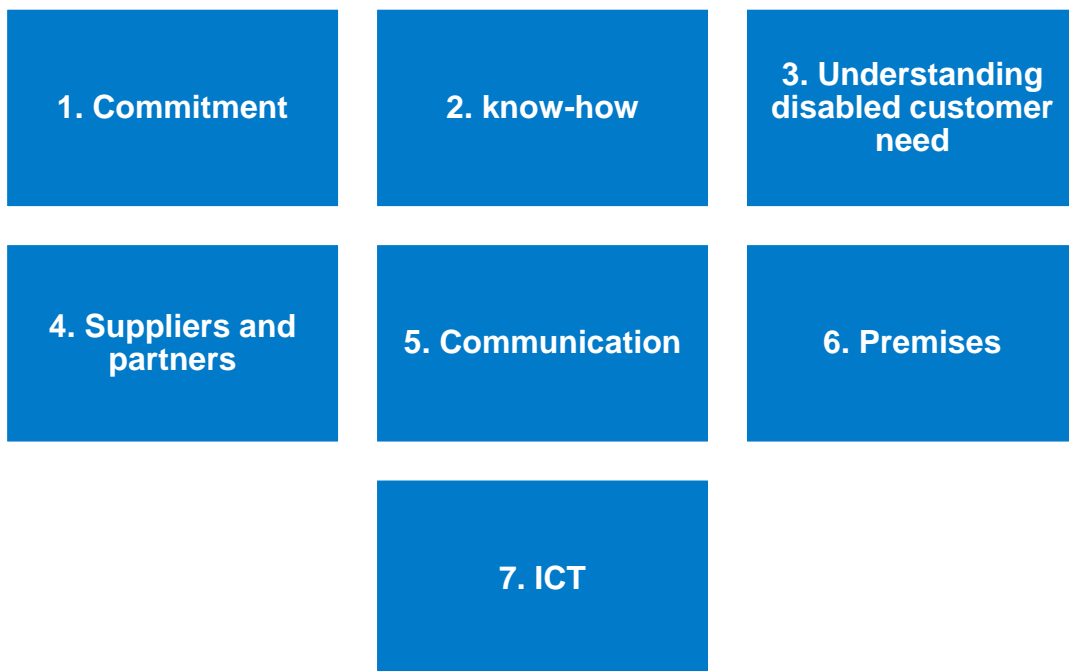
Assessing when disability is relevant to a particular service area

A document submitted to BDF for review indicated that the following service areas sit within the States' Trading Supervisory Board:

- Guernsey Airport
- Guernsey Water & Wastewater
- Guernsey Dairy
- Guernsey Waste
- States Works
- Guernsey Harbours
- Property Services
- SoGTA Central

Given the varied nature of the service areas that sit underneath each of the States' Principal Committee and the Trading Assets Supervisory Board, 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.

In addition to considering the needs of disabled people when services are directly delivered, correspondence from Property Services highlighted that some trading assets' activities, whilst not delivered directly to the public, do have a direct impact.

We were pleased to note the following examples (submitted to us by Property Services) where the needs of disabled users had been considered:

- Property Services has undertaken an upgrade of a number of existing public conveniences to ensure that they comply with building regulations regarding accessibility for disabled people.

- When supporting other Committees with capital construction projects, Property Services will work with them to ensure that proper consideration within plans is given to accessibility.

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 States' Trading Supervisory Board.

1. Commitment

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

Leading BDF members have developed public commitments to meeting the needs of disabled customers. For example:

- Sainsbury's has publicly committed to becoming 'the most inclusive retailer where people love to work and shop'[2].
- Barclays aims 'to become the most accessible and inclusive FTSE company for all our customers, clients and colleagues'[3].

As part of our wider review, we identified that the Guernsey Museums and Galleries website contains a public commitment to improving disability performance:

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

This is positive practice and one that we would recommend that the States' trading assets seek to replicate. A review of Guernsey Water's website identified that the organisation has a customer charter[5], although it contains no commitment to being inclusive. We recommend that Guernsey Water amend the Charter to include a commitment to meeting the needs of a diverse range of customers, including older and 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 with responsibility for leading work on meeting the needs of disabled

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[2] http://sainsburys.jobs/information/diversity (accessed 15/05/17)

[3] https://www.home.barclays/about-barclays/diversity-and-inclusion/disability.html (accessed 15/05/17)

[4] http://www.museums.gov.gg/CHttpHandler.ashx?id=90463&p=0 (accessed 15/05/17)

[5] http://www.water.gg/sites/default/files/Customer%20Charter.pdf (accessed 15/05/17)

service users. One of the respondents indicated that there is a designated lead and gave the following name: Chris Hall, Customer Service Manager (Guernsey Water).

It is positive that Chris is viewed as playing a leading role in improving the accessibility of Guernsey Water's services. We recommend that the States' Trading Supervisory Board'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 begin to measure and improve the performance of the service.

One workshop participant reported that airport's management have regular meetings that focus specifically on issues relating to diversity and inclusion. The participant suggested that they could add disability as a standing item to these meetings. This is an idea that we would certainly support.

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 one survey respondent indicated awareness of a plan.

During the workshop, one participant reported that while the airport did not have a specific disability plan, existing plans could be amended to ensure that disability is incorporated. This is positive and we recommend that senior leads from the States' Trading Supervisory Board ensure that all relevant service areas develop disability-related plans that are specific to their area. Leads can use the recommendations in this report in conjunction with the audit and action planning tool in Appendix C to develop a high level plan for their service area.

Key recommendations for the Disability Action Plan: Commitment

- Ensure that relevant trading assets develop a public commitment to meeting the needs of disabled customers.
- Ensure that each trading asset (where relevant) has a nominated lead who is responsible for leading work on improving provision for disabled customers.
- Add disability as a standing item to Guernsey Airport's internal diversity and inclusion meetings
- Ensure that all relevant trading assets develop disability-related plans that are specific to their area
- Ensure that service area leads use the audit and action planning tool in Appendix C to measure and improve the performance of their service.

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.

Workshop participants identified a number of positive examples of equipping colleagues to feel confident and knowledgeable with regard to meeting the needs of disabled customers. For example, workshop participants reported that:

- Training on handling passengers with reduced mobility was undertaken by airport staff in 2016. The training was also attended by the airline's handling agents and there is now a plan to repeat the training on a regular basis.
- Airport staff have undertaken training in partnership with Guernsey's bus operator and Aurigny. A recent example was training on dementia delivered by Dementia Friendly Guernsey[6].
- Harbour staff have undertaken 'diversity' training in association with Condor Ferries.

In addition to these positive examples, some workshop participants commented that they lack confidence in disability matters and do not know where to go for information or support. It was felt that some additional training would be beneficial. Our wider review has identified that some service areas have found the States' online disability awareness training to be useful as a means of promoting a general awareness of how to meet the needs of disabled customers[7]. Senior leads from the States' Trading Supervisory Board might consider promoting this to all customer-facing employees.

Survey respondents were asked if they ensure that public-facing employees are confident interacting with disabled people. Two of the seven respondents felt that this question was N/A to their service area. Of the applicable answers, two answered yes and three indicated that they do not ensure that customer-facing staff are confident.

These mixed responses suggest that senior leads from the States' Trading Supervisory Board should review the training available to frontline staff in order to ensure that in addition to providing a level of general awareness, it also addresses the specific disability-related requirements of their roles.

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[6] http://dementiafriendly.org.gg/ (accessed 20/05/17)

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

Key recommendations for the Disability Action Plan: Know How

- Promote the States' online disability awareness training to all frontline staff within the States' Trading Supervisory Board.
- Review the training available to frontline staff in order to ensure that, in addition to providing a level of general disability awareness, it also addresses the specific disability-related requirements of their roles

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. Of the four applicable responses to this question, three responded positively and one indicated that the needs of disabled customers are not anticipated.

Our review identified the following examples of good practice:

- Guernsey Airport is redrafting its procedures for the handling of passengers with reduced mobility.

- A summary of disability-related activity, submitted to BDF, relating to the States' Trading Assets reported that when looking at developing or designing new services for recycling, Guernsey Water: 'tries to ensure it considers how these will impact on older and disabled customers'. The document noted that, as a result, initiatives such as introducing kerbside collections: 'has made recycling much more accessible to a wider range of islanders'.

- A workshop participant reported that Guernsey Water is considering introducing a product that would have a 'vulnerability tariff' for customers with disabilities. For example, a customer who uses a lot of water due to a condition such as obsessive compulsive disorder or Crohn's disease.

Workshop participants discussed how disability-related data might be used to better enable services to anticipate the needs of islanders. 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 our overarching report to the States of Guernsey, we have recommended that the States makes disability-related data available to service leads from across the organisation.

Involving disabled customers in service design

In a question about whether disabled people are involved in the development of services, only one of the four applicable responses indicated that disabled people are involved in service design. Although this is concerning, workshop participants identified the following examples of good practice:

- Several meetings have been held with Airport leads and the Guernsey Disability Alliance (GDA) to understand the requirements of passengers with reduced mobility. This interaction has fed directly into training for airport staff.
- The airport regularly undertakes passenger surveys and plans to focus the next survey on disability.
- Guernsey Harbours have consulted with the GDA on the relocation of a cruise ship passenger landing facility.

It is positive that both Guernsey Airport and Guernsey Harbours have consulted with the GDA. At a focus group with GDA members, participants welcomed being consulted but were also keen to encourage the States to ensure that the GDA's members are not its only source of insight into the views and experiences of disabled islanders.

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 States' Trading Supervisory Board also adopt. Where disability complaints are identified, these should feed directly into service improvement plans.

Key recommendations for the Disability Action Plan: understanding the needs of disabled customers

- Ensure that where services are delivered directly to the public, disabled people are routinely involved in the development and review of those services.
- Develop a means of assessing the views and experiences of disabled customers who are not members of the GDA.
- Review complaints received about services that are delivered directly to the public to assess whether any are disability-related.

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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: '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?'

Survey respondents indicated that a range of third parties had some involvement in delivering services to the public, however, only one (of four applicable responses) indicated that suppliers are required to demonstrate an ability to meet the needs of disabled customers. The disability 'competence' of suppliers 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.

An example of a supplier was identified during the workshop. One participant reported that G4S provide cleaners and security staff at Guernsey Airport and that they were confident that G4S employees would be responsive to the needs of any disabled people they come into contact with. This is positive and we recommend that the airport liaise with G4S to confirm what training and guidance their staff receive in this regard.

In addition to suppliers, workshop participants also discussed examples of good work undertaken with other partners, including:

- The airport is working with the airline Aurigny in looking at alternative ramps and platforms that could be used to improve the experience of disabled customers when boarding and alighting certain aircraft.
- Guernsey Harbour Staff have attended diversity training with staff from Condor Ferries.

Key recommendations for the Disability Action Plan: suppliers and partners

- Review the extent to which third parties deliver elements of public service on behalf of the States' Trading Supervisory Board.
- Where elements of the States' Trading Supervisory Board's public services are delivered by third parties (for example, security at Guernsey Airport), liaise with suppliers to ensure that they can demonstrate an understanding and ability to meet the needs of a 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

Five out of six survey respondents indicated that they did not ensure that external communication methods are as inclusive and accessible as possible to disabled customers. This is concerning as inaccessible information could impact negatively on the ability of disabled customers to understand their bills or disabled passengers who want to find out about departure or arrival times.

It is advisable that communication leads for the States' Trading Supervisory Board's key service areas review communications to ensure they have been designed with accessibility in mind. Key considerations include:

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[8] WCAG). 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 an accessibility statement which states:

'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'[9].

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 Guernsey Airport, Guernsey Water, Guernsey Dairy and Guernsey Harbour identified no such reference.

One workshop participant reported that the navigation of the Guernsey Water website would benefit from improving. In light of this, we recommend that any improvements to websites include a review of, not only accessibility but also usability as it relates to the experiences of disabled users. Usability considers how users with particular disabilities interact with the product in practice. It is entirely possible for a product to be 'accessible' in terms of the WCAG standards but in practice very difficult for a disabled user, so usability testing by a panel of disabled people determines the practical usability of the product.

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[8] http://www.w3.org/TR/WCAG20/ (accessed 01/05/17)

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

It is advisable therefore that colleagues responsible for Trading Assets' various websites confirm that sites have been designed to be accessible or commission an audit to identify how accessibility and usability might be improved for disabled users. BDF would be happy to support via our Access Pathway service, a 3-step process designed to ensure that websites and mobile applications meet best-practice and international standards for accessibility[10].

Virtual communications

In addition to the accessibility of websites, communication leads should also be alert to the need to ensure that virtual communications such as social media or videos are as accessible as possible. Examples of inaccessible practice include presenting key information in:

- Videos that have no subtitles. This can disadvantage customers with a hearing impairment.
- Images posted on social media which contain important written or visual information without an explanation in text form. This can disadvantage users with a visual impairment who rely on 'screen reader' technology to read digital information.

Contact provision

As a minimum, customers should be offered a range of contact methods and we were pleased to note that Guernsey Water's customers are invited to fill out an online form, phone, email or write. A further good practice to consider is an innovation now being used by several BDF Members such as British Gas[11] to improve access for deaf customers. This involves sign language users having access to an interpreter via the webcam on their computer who will then relay the conversation to a contact centre agent.

We identified an area for improvement on the special assistance page of the airport website which invites passengers to contact the Airport Information Desk by phone only. Clearly, this might present a barrier to passengers with a hearing or speech impairment[12].

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[10] http://www.businessdisabilityforum.org.uk/our-services/access-pathway/

[11] https://www.britishgas.co.uk/accessibility.html

[12] https://www.airport.gg/passenger-information/special-assistance

We recommend that Trading Assets review contact provision for to ensure that it enables ease of access for disabled islanders. This means that:

- Call routing should be as accessible as possible. Call routing options can prevent some disabled callers from accessing services via the phone. For example, if the system does not default to an operator if no option is chosen from a menu13.
- Callers should be offered a range of contact options.
- Call handlers should be trained to ensure they are confident and knowledgeable when handling calls from disabled callers.

Alternative formats

It is good practice to provide materials in alternative formats when a disabled customer requests them (and it is reasonable to do so). Alternative formats include large print, easy read, electronic, audio and Braille. During the workshop, a participant noted that Guernsey Water are able provide letters in large print if requested.

It is advisable that the trading assets review their provision to ensure that disabled customers can request alternative formats to centrally produced documents. BDF would be happy to share its guidance on producing alternative formats to with relevant leads.

Hard copy information

Promotional materials, forms and other documents can disadvantage disabled users if information is overly complicated and accessible design guidelines are not followed. Appendix D contains a checklist to aid the creation of accessible information.

Key recommendations for the Disability Action Plan: communication

- Review key customer communication channels (e.g. phone and digital) for key services to ensure they are designed to meet the needs of disabled customers.
- Confirm that customer-facing websites (including Guernsey Airport, Guernsey Water, Guernsey Dairy and Guernsey Harbour) have been designed to be accessible or commission an audit to identify how access might be improved for disabled users.
- Consider how to better meet the communication needs of customers who use Sign Language.
- Amend the contact details on the special assistance page of the Guernsey Airport website so that it includes an alternative to using the phone.
- Review hard copy and virtual communications to ensure they are designed to meet the needs of disabled customers and ensure that new documents are designed to be accessible.

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

6. Premises

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

Three out of four survey respondents, who indicated that a question about the accessibility of public facilities was applicable to them, said that they did ensure that premises are accessible.

Workshop participants identified a number of positive examples, including:

- Guernsey Harbours have recently installed a hoist and a longer gangway at the cruise liner pontoon and made improvements to the muster area and exit routes in order to improve the experience of passengers with mobility impairments.
- Guernsey Airport has a priority seating area in departures for disabled passengers and its website includes detailed information about the accessibility of its facilities via DisabledGo[14].
- Paths to the cemetery and crematorium had recently been made safer and more accessible.

In addition to these positive examples, workshop participants noted the following challenges:

- There is currently no disabled access to the Harbour office and this has resulted in a disabled customer having to be served outside. It was reported that this is due to be addressed with the opening of a new customer services facility in two or three years' time.
- The size of the airport terminal is a constraint. For example, it was reported that more space is needed to speed up security however, doing so might limit accessibility.

Balancing the need to adapt buildings to ensure maximum accessibility and manage limited space or budget is a challenge for many organisations, including the States of Guernsey.

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[14] https://www.airport.gg/passenger-information/special-assistance

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 are completely accessible. Leading BDF members manage the challenge by:

a) 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 States' Trading Supervisory Board with the basis for developing a detailed understanding of the accessibility of its public service-related buildings.

b) Where buildings are inaccessible, developing plans to remove or avoid known barriers.

c) 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.

d) 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.

Key recommendations for the Disability Action Plan: Premises

- Develop a clear understanding of the accessibility of all of the States' Trading Supervisory Board's public facing buildings.
- Where buildings are inaccessible (for example, the Harbour Office), develop realistic and proportionate plans to remove or avoid barriers.
- Ensure that customer-facing staff are trained to recognise when a customer might need support using a building and be proactive in offering support.

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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. All four of the respondents who thought that this question applied to their service indicated that they do not ensure that ICT is accessible.

We recommend therefore that ICT leads from the States' Trading Supervisory Board review customer related ICT to ensure that is accessible to disabled users. 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[15].
- 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[16].

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 States' Trading Supervisory Board may also find the resources of value.

Key recommendations for the Disability Action Plan: ICT

- Provide IT leads working within the States' Trading Supervisory Board with information and guidance developed by BDF's Technology Taskforce.

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

[16] 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 States' Trading Supervisory Board. For example:

- When supporting other Committees with capital construction projects, Property Services will work with them to ensure that proper consideration has been given to accessibility within plans.

- Airport and Harbour staff have liaised with the Guernsey Disability Alliance in order to improve service provision and have undertaken disability-related training.

- Guernsey Water have given thought to meeting the needs of 'vulnerable' customers including those with disabilities.

A number of areas for improvement have been identified. For example:

- Few services have nominated leads with responsibility for improving disability performance and there are a lack of specific plans aimed at improving provision for disabled customers.

- Suppliers that provide an element of public service are not routinely required to demonstrate an understanding and ability to meet the needs of disabled customers.

- Some facilities were reported to be challenging with regard to access and, in one instance, inaccessible to disabled customers.

- The communication needs and preferences of disabled customers are not routinely anticipated or accommodated.

Appendix B contains a recommended Disability Action Plan. The actions flow directly from the findings in the report and we recommend that senior colleagues with responsibility for customer service within the States' Trading Supervisory Board assume overall responsibility for the plan. Key recommendations include:

- Identify a named lead within each service area that has responsibility for leading work on meeting the needs of disabled customers.

- Where buildings are inaccessible (for example, the Harbour Office), develop realistic and proportionate plans to remove or avoid barriers.

- Review key communications such as external websites to ensure they are designed to meet the needs of disabled customers and ensure that new hard copy and virtual communications are designed to be as accessible as possible.

- Where elements of the States' Trading Supervisory Board's public services are delivered by third parties (for example, security at Guernsey Airport), liaise with suppliers to ensure that they can demonstrate an understanding and ability to meet the needs of a disabled customers.

Appendix A

States of Guernsey service leads survey

1. Where do you work?

    _____

2. Which Committee does your area come under?

    _____

3. What is your job title?

    _____

4. What is your name?

    _____

5. What is your contact number?

    _____

6. What is your email address?

    _____

Commitment

7. Is there a designated senior individual who has responsibility for leading work on meeting the needs of disabled users of the service?

    Yes ☐

    No ☐

8. (If yes) Please give their details (name, job title, email)

    _____

9. Is there a plan or strategy to improve the delivery of the service as it impacts on disabled customers/service users?

    Yes ☐

    No ☐

    N/A ☐

Know-how

10. Do you ensure that your public-facing employees are confident interacting with disabled people?

This includes:

Ensuring your employees know what to do in disability-related customer-facing situations; and

Ensuring your employees can access support or guidance on disability-related issues in some way (e.g. through publications, advice or training).

Yes ☐

No ☐

N/A ☐

Services

11. Do you anticipate the needs of groups of disabled customers/service users (e.g. people with hearing impairments, mobility impairment etc.)?

This includes:

Thinking about the barriers that people with common impairments might encounter when accessing your service and removing them in advance.

Yes ☐

No ☐

N/A ☐

12. Do you ensure that disabled people are involved in the development of your services?

This includes:

Involving and consulting with disabled people when designing and improving your services in order to understand and remove any barriers they might face.

You might do this by gathering feedback from disabled service-users or via social media activity asking for feedback and comments on the service.

Yes ☐

No ☐

N/A ☐

Suppliers and partners

13. If elements of your service are delivered by a third party supplier, are they required to demonstrate an understanding and an ability to meet the needs of disabled service users?

This includes:

Being able to identify when disability and accessibility are relevant to a contract; and

Ensuring you have a process for identifying if a potential supplier or partner will be able to deliver an inclusive and accessible product or service.

Yes ☐

No ☐

N/A ☐

14. Please list key suppliers that provide an element of a public service (max 150 words)

_____

_____

_____

_____

Communication

15. Do you ensure your external communication methods are as inclusive and accessible as possible to disabled service users?

This includes:

Being able to provide information and communications in a range of formats for people with a variety of impairments (for example, large print, Braille, subtitles and transcripts with videos); and

Providing at least three ways for people to get in touch with you (for example, telephone, email, real-time British Sign Language interpretation).

Yes ☐

No ☐

Premises

16. Do you ensure your premises are inclusive and accessible to disabled service users?

This includes:

Ensuring your premises are inclusive and accessible to service users with a wide range of impairments – from wheelchair-users and people with visual impairments, to people with autism and dyslexia; and

Where it is not possible to be fully accessible (e.g. heritage requirements) that there are other ways of disabled people engaging with your service.

Yes ☐

No ☐

N/A ☐

Information and Communication Technology (ICT)

17. Do you ensure that your ICT is inclusive and accessible to disabled service users?

This includes:

Making adjustments for disabled service users where your public-facing ICT is not accessible; and

Ensuring you know how accessible your ICT is and having a process for ensuring inclusivity and accessibility are considered during its reviews and maintenance.

Yes ☐

No ☐

N/A ☐

18. How confident are you that your service is currently meeting the needs of disabled customers/service users?

Level of confidence

1 ☐ – Not confident

2 ☐

3 ☐

4 ☐

5 ☐ – Extremely confident

19. Please can you give more information about the reason for your answer to the previous question?

_____

_____

_____

_____

Appendix B

Recommended Action Plan for the States' Trading Supervisory Board

Recommendation	Page	Lead	Timeframe	Priority
Commitment				
1. Ensure that relevant trading assets develop a public commitment to meeting the needs of disabled customers.	12			Medium
2. Ensures that each trading asset (where relevant) has a nominated lead who is responsible for leading work on improving provision for disabled customers.	12			High
3. Add disability as a standing item to Guernsey Airport's internal diversity and inclusion meetings	12			Medium
4. Ensure that all relevant trading assets develop disability-related plans that are specific to their area	12			High
Know-how				
5. Promote the States' online disability awareness training to all frontline staff within the States' Trading Supervisory Board.	14			Medium
6. Review the training available to frontline staff in order to ensure that, in addition to providing a level of general disability awareness, it also addresses the specific disability-related requirements of their roles	14			Medium
Understanding the needs of disabled customers				
7. Ensure that where services are delivered directly to the public, disabled people are routinely involved in the development and review of those services.	16			High

Recommendation	Page	Lead	Timeframe	Priority
8. Develop a means of assessing the views and experiences of disabled customers who are not members of the GDA.	16			Medium
9. Review complaints received about services that are delivered directly to the public to assess whether any are disability-related.	16			Medium
Suppliers and Partners				
10. Review the extent to which third parties deliver elements of public service on behalf of the States' Trading Supervisory Board.	17			High
11. Where elements of the States' Trading Supervisory Board's public services are delivered by third parties (for example, security at Guernsey Airport), liaise with suppliers to ensure that they can demonstrate an understanding and ability to meet the needs of a disabled customers.	17			High
Communication				
12. Review key customer communication channels (e.g. phone and digital) for key services to ensure they are designed to meet the needs of disabled customers.	20			High
13. Confirm that customer-facing websites (including Guernsey Airport, Guernsey Water, Guernsey Dairy and Guernsey Harbour) have been designed to be accessible or commission an audit to identify how access might be improved for disabled users.	20			Medium
14. Consider how to better meet the communication needs of customers who use Sign Language.	20			Medium

Recommendation	Page	Lead	Timeframe	Priority
15. Amend the contact details on the special assistance page of the Guernsey Airport website so that it includes an alternative to using the phone.	20			High
16. Review hard copy and virtual communications to ensure they are designed to meet the needs of disabled customers and ensure that new documents are designed to be accessible.	20			Medium
Premises				
17. Develop a clear understanding of the accessibility of all of the States' Trading Supervisory Board's public facing buildings.	22			High
18. Where buildings are inaccessible (for example, the Harbour Office), develop realistic and proportionate plans to remove or avoid barriers.	22			High
19. Ensure that any customer-facing staff are trained to recognise when a customer might need support using a building and be proactive in offering support.	22			Medium
Information and communication technology				
20. Provide IT leads working within the States' Trading Supervisory Board with information and guidance developed by BDF's Technology Taskforce.	23			High

Appendix C

Audit and action planning tool for individual service areas

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

Question	Yes /No	Comment	Action	Who/when
1. Are public-facing employees are confident interacting with disabled people?				
2. Is there a plan or strategy to improve the accessibility of the service for disabled customers?				
3. Do you anticipate the needs of groups of disabled customers (e.g. people with hearing impairments, mobility impairment etc.)?				

Question	Yes /No	Comment	Action	Who/when
4. Do you ensure that disabled people are involved in the development of your services?				
5. Can disabled customers request adjustments to services and is there a procedure for making adjustments in a consistent way?				
6. If elements of the service are delivered by a third party supplier, can suppliers demonstrate an understanding and an ability to meet the needs of disabled service users?				
7. Are external communication methods as inclusive and accessible as possible to disabled customers?				
8. Are premises inclusive and accessible to disabled customers?				
9. Is ICT is inclusive and accessible to disabled customers?				

Appendix D

Accessible communications checklist

Question	Yes	No
Are you using sans serif fonts like Arial, Calibri or Candara?		
Do you use the same font consistently?		
Is text written in sentence case (Not Title Case or CAPITALS)?		
Do you use **bold** for emphasis (rather than italics, which is inaccessible to some users)?		
Are you using a minimum of 12pt text (or 14pt for Easy Read)?		
Does the text colour contrast well with the background?		
Is text left aligned (not centred or justified)?		
Do you avoid underlining, capitalisation or italics for emphasis?		
Do you break up long text using clear headings and subheadings?		
Are you using short sentences and plain English wherever possible?		
Do you avoid using colour for emphasis?		
Do you avoid images that rely on colour for meaning?		
Do you explain the content of images in text for users who cannot see them?		
Do you avoid using images as a background for text?		
If you are using video, are these captioned?		
If you are using audio, do you offer a transcript?		
If communicating about disability, are you aware of disability etiquette? See BDF's Disability Communication Guide for more information.		

Question	Yes	No
Do you tell readers where they can go to request the information in an alternative format (e.g. large print, easy read, audio accessible pdf)?		
Do you offer different ways for people to get in touch with you?		
For large and complex communications, have you had these tested by external experts (BDF can advise on this)?		

Appendix E

Premises Accessibility Checklist

It is good practice to have an Access Audit carried out so that you know how accessible your buildings are and are aware of any barriers that someone with a disability might encounter. If you cannot remove these barriers, you should develop strategies or put adjustments in place to overcome them.

This document can be used by a Facilities Manager or a Diversity/HR Professional as an aide-memoire for ensuring accessibility within your premises is maintained.

It should be noted that this checklist does not take the place of a full access audit carried out by suitably qualified professionals.

Arriving at the building Checklist

Physical Considerations

Question	Yes	No
Is the main entrance to your building easy to find? (adequate signage on display)		
If your main entrance is not accessible for all disabled people is it obvious where the alternative entrance is?		
Are your designated parking spaces kept available for disabled people? (e.g. have you made it clear these spaces are not for use by non-disabled people)		
Is the walkway to your building free from pot-holes, weeds or loose paving stones?		
Is the pathway/external ramp kept clear particularly in the winter?		
Is your exterior signage in good order? (e.g. nothing obscuring the signage, not faded, or in good working order if electric).		
Is the exterior lighting adequate?		
If you have a temporary ramp, is it in good order and available for use?		
If you have a buzzer or intercom is it in good working order?		

If you have an entry-phone system with an induction loop, is this in good order?		
If you have automatic doors, are they in good working order?		
Is door matting set into a mat well and not loose?		
If difficulties are experienced, is there a bell for assistance which will be responded to?		

Management or Training Considerations

Question	Yes	No
Are your reception staff trained in assisting disabled people who drive their own cars to the entrance, e.g. can they arrange for the car to be driven to the car park?		
Are your reception or security staff confident in making adjustments for disabled people who cannot use an intercom or entry-phone system? (e.g. due to a hearing or visual impairment)		
Are your reception or security staff confident in assisting disabled people who may have problems opening heavy doors?		

Comments

Inside the building Checklist

Physical Considerations

Question	Yes	No
Is the space between entrance and reception desk clear of obstacles?		
Can people on either side of the reception desk see each other? (e.g. boxes or papers not obscuring the view)		
Is clearance under desks or counters free from clutter to enable wheelchair users to get close enough to fill in forms?		
Is the reception area well lit, to enable people with hearing impairments to lip read easily and people with visual impairments to navigate the areas easily?		
Is your amplifying device or induction loop at reception and is there clear signage advertising this?		
Is your reception seating area tidy and free from obstructions?		
Have you provided Fire Safety and Emergency information in a clearly printed format and have alternative formats available?		

Management or Training Considerations

Question	Yes	No
Are reception and security staff confident in interacting with disabled people?		
Do you ask visitors if they have any requirements before they arrive at your premises?		

Comments

Moving around inside the building

Physical Considerations

Question	Yes	No
Is there an up to date map of the building layout near the entrance?		
Does the map have a high colour contrast and use an accessible font and size, for the benefit of people with sight problems?		
Is internal signage in good order and lit adequately?		
Is any temporary signage in an accessible size and font? (e.g. sans serif)		
Is floor covering slip-resistant and safely secured to the floor?		
Are corridors well lit?		
Are all automatic doors working?		
Are hold open devices for fire doors in good working order?		
If you have painted recently, have you used distinctive tones or colours to aid orientation?		
Are elevators in good working order?		
Are the floor announcers and visual signals in elevators working?		
Is there an adequate delay on the elevator door closing mechanism?		
Have you ensured a good standard of cleaning and clearance of obstructions in and around all elevator entrances / exits?		
Is the assistance alarm in the WC in good order?		
Are the toilets clean and clear of obstructions?		
Are your amplifying devices or induction loops in good working order, and are they easy to find?		

Management or Training Considerations

Question	Yes	No
Are staff trained to direct and assist disabled people in the case of emergency?		
Are your staff trained to respond to and deal with calls for help raised using the assistance alarm in WC?		
Do staff know how to operate amplifying devices or hearing loops?		

Comments

Means of escape in an emergency

Physical Considerations

Questions	Yes	No
Are ground floor exit and entrance routes accessible to all, including wheelchair users?		
Are exit routes free from obstructions?		
If some disabled people cannot completely evacuate the building, can they reach places of safety or refuges?		
Are refuges free from obstructions / clutter?		
Are refuges clearly signposted?		
Is your audible alarm system in good working order?		

Is your visual alarm system in good working order?		

Management or Training Considerations

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

Comments

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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.

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