

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

Income Tax

January 2018

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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. The States has commissioned BDF to assess its current state of readiness for future disability discrimination legislation as both an employer and service provider.

This report for the Income Tax Service 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:

- Reviewed a written submission from the Income Tax Service on its current disability-related activity.
- Interviewed the Head of Customer Service
- Held a focus group with disabled islanders to explore their views of interacting with all of the States' services.
- Reviewed publicly available online information about the Income Tax Service.

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.

Summary of our findings

During our review we identified the following examples of disability-related practice in relation to the Income Tax Service:

- The Income Tax Service appointed a Social Inclusion Champion in January 2017 whose remit includes a focus on meeting the needs of disabled customers.
- The customer-facing counter team, together with a number of back office staff, have undergone Dementia Awareness training.
- During the design phase of the new Joint Counter Service, the Income Tax Service engaged with the Guernsey Disability Alliance and Access for All in order to understand the requirements of disabled service users.
- Office moves have meant that the service's premises are now more accessible to disabled customers.

Our recommendations are:

- Use the audit and action planning tool in Appendix B to review the Income Tax Service's practice across the full range of areas where disability is relevant.
- Publicise the availability of a private room for customers who would benefit from a private space to carry out their transaction.
- Develop a disability-related FAQ in order to publicise the various provisions that are in place to support disabled customers.
- Link to detailed information about the accessibility of the Service's customer service locations via the DisabledGo website.

Analysis of disability performance: Income Tax

This section sets out the findings of our research on the extent to which the needs of disabled islanders are considered by the Income Tax Service.

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 our wider research with the States. These cover: commitment, knowledge and skills of key colleagues, understanding the needs of disabled customers, suppliers and partners, communication, and premises.

1. Commitment

2. know-how

3. Understanding disabled customer need

4. Suppliers and partners

5. Communication

6. Premises

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. 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’¹.

This is positive practice and one that we would recommend that the Income Tax Service seeks to replicate.

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.

We were pleased to learn that the Income Tax Service appointed a ‘Social Inclusion Champion’ in January 2017. Part of the Inclusion Champion’s role includes engaging with the Guernsey Disability Alliance (GDA) in order to ensure that the Income Tax Service understands the needs of disabled customers. The Social Inclusion Champion reports to the Head of Customer Services who is a member of the Senior Management Team.

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.

Although some good work has already taken place, there is currently no specific plan to improve performance for disabled customers. Appendix B contains an audit and action planning tool and we recommend that the Income Tax Service uses the tool as the basis for establishing a plan to make further improvements to its disability-related practice.

¹ <http://www.museums.gov.gg/CHttpHandler.ashx?id=90463&p=0> (accessed 15/05/17)

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.

During our review we learned that the Income Tax Service encourages an approach to learning and development which includes a focus on ‘the softer skills required when dealing with our customers’. It was reported that the counter team (customer-facing), together with staff in back office roles, have undergone dementia awareness training so they are better able to meet the needs of customers who may be living with dementia. This is positive practice.

We also learned during an interview with the Head of Customer service that a number of employees have used the States’ online disability awareness training and that feedback on the training has been positive.

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

Our review identified that during the design phase of the new Joint Counter Service, the Income Tax service engaged with the GDA and Access for All in order to understand the requirements of disabled service users. This is good practice.

At a focus group with GDA members, participants welcomed being consulted by the States on a range of services 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. It is positive therefore that Access for All has also been consulted.

During an interview with the Head of Customer Services, we learned that if a disabled customer calls into the office wishing to discuss their tax/contribution queries, there is an option to hold the conversation in a private room. The private space has been designed to provide a comfortable and accessible environment for customers with a range of impairments.

This is good practice and we would encourage the Service to:

- Publicise the availability of this option to all customers.
- Make it easy for customers to request a private room in advance of their visit or discretely on the day.
- Ensure that all staff (including any new members of the team) are aware of the option to use a private room and feel comfortable offering it.

In addition to providing the private meeting space, we were also impressed to learn that on some occasions Income Tax Service staff will conduct home visits to help older or disabled customers to fill out forms or access the service's website. This is excellent practice.

Reveiwng complaints

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 the Income Tax Service also adopts. Where disability complaints are identified, these should feed directly into service improvement plans.

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.

We learned that all of the services delivered by the Income Tax Service are delivered by States employees. However, it was reported that should third parties be required to deliver any of aspect of service provision, the Service would consider 'how much contact they have with customers and whether they need to undergo some awareness training prior to their placement'.

BDF advocates a step by step approach to working with suppliers and partners which involves addressing disability requirements at the following stages of the procurement cycle:

- a) Governance and expectations
- b) Defining the business need
- c) Developing the procurement strategy
- d) Supplier selection and evaluation
- e) Contract award and management

We would be happy to share our detailed guidance on disability-smart approaches to working with suppliers and partners with the Income Tax Service should the need arise.

5. Communication

Website

A review of the Gov.gg website identified that much of the States' customer-related information (including in relation to income tax) is hosted on the main website.

During an interview with the head of Customer Services, we learned that work is underway to ensure that the guidance provided via the Service's FAQs² section is as useful as possible. A review of the FAQs identified that there are currently no questions about access for disabled customers. Developing a disability-related question and answer would provide the Income Tax Service with a platform to publicise the various provisions that are in place to support disabled customers.

Contact page

It is good practice to provide customers with a range of contact methods and a review of the Income Tax Service's contact page identifies that customers are invited to call, email or visit³.

During our work with other services, we identified that some service areas have updated their contact pages to include more detailed information (via the DisabledGo website) about the accessibility of its office. For example, Social Security's contact page⁴ contains the following reference and link:

'Further details are included below the form and you can [follow this link for accessibility information](#)'

Improving the tone and accessibility of forms

During a focus group with members of the GDA, a number of disabled people suggested that many of the States service-related forms are not accessible. Participants also highlighted the general tone of the States' written communications as a barrier to engaging with the States. One participant suggested that the tone of some letters is: 'brutal, harsh and not personalised'. It was noted that letters and forms frequently use jargon and tend to: 'always assume the worst of the recipient'. When asked for examples of areas where improvement was needed, Income Tax was included as an example.

² <https://www.gov.gg/taxationfaq>

³ <https://www.gov.gg/article/135140/Contact-Us---Income-Tax>

⁴ <https://www.gov.gg/article/135138/Contact-Us---Social-Security>

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 underway⁵.

During an interview with the Head of Customer Services we learned that action arising from this exercise has included:

- Standardising the use of an accessible font size and style
- Improving the tone of the Service's correspondence by removing technical jargon and references to the law.

6. Premises

Our review did not involve a technical audit of premises however; we learned during our review that a recent relocation has enabled the Income Tax Service to consider how to better meet the needs of its disabled customers. For example, the Head of Customer Service reported that there is now a wheelchair accessible customer service desk.

As we have previously discussed, detailed information about the accessibility of the States' customer service facilities is held on the DisabledGo website. We recommend that the Income Tax Service proactively signposts customers to this information in any electronic communications.

Appendix C 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.

⁵ <http://www.signpost.gg/CHttpHandler.ashx?id=107652&p=0>

Recommendations

We recommend that the Head of Customer Services and Social Inclusion Champion review these recommendations. We have set the recommendations out in an action plan in Appendix A to aid this process.

1. Use the audit and action planning tool in Appendix B to review the Income Tax Service's practice across the full range of areas where disability is relevant.
2. Publicise the availability of a room for disabled customers who would benefit from a private space to carry out their transactions.
3. Develop a disability-related FAQ for the Income Tax Service webpages in order to publicise the various provisions that are in place to support disabled customers.
4. Link to detailed information about the accessibility of the Service's customer service locations via the DisabledGo website.

Appendix A

Recommended Action Plan for the Income Tax Service

Recommendation	Lead	Timeframe	Priority
1. Use the audit and action planning tool in Appendix B to review the Income Tax Service's practice across the full range of areas where disability is relevant.			Medium
2. Publicise the availability of a room for disabled customers who would benefit from a private space to carry out their transactions.			Medium
3. Develop a disability-related FAQ for the Income Tax Service webpages in order to publicise the various provisions that are in place to support disabled customers.			Medium
4. Link to detailed information about the accessibility of the Service's customer service locations via the DisabledGo website.			Medium

Appendix B

Audit and action planning tool for individual service areas

Service area: Income Tax				
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 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.)?				

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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 C

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

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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

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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?		
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Management or Training Considerations

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

Comments

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www.businessdisabilityforum.org.uk

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Registered charity no: 1018463.

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

Registered in England under Company No. 2603700