

## Appendix 3

### Responses from Departments

#### Commerce and Employment Department

Thank you for your letter that sought information from this Department on work done in the last 18 months either specifically in support of the implementation of the Strategy or which takes account of the Strategy and its overall aims.

As regards the direct support of Strategy implementation work, and in the light of the requirement of the Strategy to extend the protections for workers to encompass discrimination on the grounds of disability, we have been pleased that Mrs Toni Airley, our Principal Employment Relations Officer, has been able to devote considerable effort to the work of the Disability Legislation Group which was tasked to frame appropriate proposals and drafting instructions supporting States' resolution 3 of the Strategy.

*To approve, in principle, the enactment of legislation under the Prevention of Discrimination (Enabling Provisions) (Bailiwick of Guernsey) Law, 2004 to prevent discrimination against disabled people and carers and provide for equality of opportunity, and direct the Policy Council to revert to the States with detailed proposals for such legislation following consultation with other States Departments, and representatives of the business sector, disabled people and carers, before the end of 2015.*

Some of this work is still in hand at the time of writing; however I understand that the work in relation to employment protection is largely complete and could, with States approval, be brought to fruition in a relatively short period of time.

Marketing & Tourism aims to get greater engagement with disability issues, working closely with industry to encourage a positive attitude to access for all. This is reflected in Strategic Aim 3 of the Guernsey Tourism Strategic Plan "... *Deliver An Exceptional Visitor Experience.*" There is a specific action plan in the Strategy which aims long term at ensuring Guernsey can be accurately portrayed as an Accessibility friendly island.

As the key to the delivery of the strategic aim is to change attitude across the tourism sector, the Department is focussing on two areas where this can be influenced, namely, accommodation and attractions accreditation. A requirement has been introduced for these types of businesses to develop and publish "access statements" that will allow potential customers with disabilities to make informed decisions about their holiday choices. We are now working with individual sites to progress this and greater prominence is being given to the ease of access to this type of information, especially via the new VisitGuernsey website. The Chamber of Commerce Tourism and Hospitality Sub Group has been encouraged to get their members to publish clear accessibility information on line.

Department staff work closely with our contracted Quality Assessors Quality in Tourism, who have built up considerable expertise in this area in England over a number of years, and are more than willing to share best practice and practical examples of solutions with individual businesses. Business operators are able to apply for full National Accessible Accreditation as part of their annual quality assessment inspection. Workshops for operators have been delivered in conjunction with the last Tourism Seminar, and more may be facilitated in the future.

The Department continues to work with both the Disability Alliance and Disabled Go Guernsey to promote the importance of providing adequate information for all, through the development of a digital accessibility guide for the Island. However, progress is restricted by the absence of any dedicated resource. Also, the Department was pleased to invite representatives of the Guernsey Disability Alliance to its annual update and briefing earlier this year, not only to keep them up to date but also to provide opportunities for them to discuss these matters with hoteliers.

As a final point the Department is working with industry colleagues on the other islands of the Bailiwick to provide support and encouragement for similar awareness in those locations.

More widely, but less directly, the Department is pursuing policies which support the aim set out in the Strategy to broaden inclusion in the workplace, which is part of the theme of bringing about "... full and effective participation and inclusion in society." The specific Commerce and Employment work areas relevant here are those seeking to develop new economic opportunities such as the digital sector, and the work in hand on skills, particularly the skills gap analysis.

I hope the above information is of use to you in reviewing progress in response to resolution 11 of the Disability and Inclusion Strategy.

**Deputy K A Stewart, Minister**

### **Culture and Leisure Department**

Thank you for your letter dated 9 June.

I am pleased to confirm that the Culture and leisure Department has maintained a close awareness of disability and inclusion issues following the States Resolution committing to a new strategy.

Whilst there has not been any capital works or alterations to properties that have necessitated reasonable adjustment since November 2013, the Department has been aware of the related policy initiatives that had been progressing for some time in the lead up to the States decision. Arising from that, the Department had previously taken steps to improve disabled access to some of its properties as and when opportunities have presented themselves. We had also introduced a 'carers go free' policy for access

to shows and events that we directly promoted (which is similar to the situation in the UK, so as to ensure that disabled persons requiring a carer are not discriminated against by effectively having to pay double).

In terms of ongoing commitment, I can advise that one member of staff within Beau Sejour, who has a good knowledge of disability and inclusion issues, has been allocated specific responsibility for such matters to ensure that there is a prominent contact point for the public to raise any matters of concern. You may also be aware that Beau Sejour maintains nine disabled parking bays outside its main entrance. Policing of these spaces is undertaken regularly by the Duty Managers to ensure that easier access for disabled persons is maintained at all times with fixed penalty notices being issued to non-disabled persons abusing the facilities.

As to policy initiatives, you may recall that when presenting its 2014 States Report in relation to the future allocation of lottery funds, the Department had recommended that any amounts exceeding the operating deficit for Beau Sejour should be allocated to an appropriation account specifically for the purposes of funding special events or enhancements to its properties. In putting this proposal forward the Department was particularly mindful of the States Resolution in relation to disability and inclusion and the fact that many of its properties, such as Castle Cornet, would benefit significantly from improvements to disabled access (as this was not something that could be easily afforded from its existing limited annual capital allocation).

I trust that this provides you with a sufficient overview of the initiatives undertaken by the Culture and Leisure Department although should you require any further details please do not hesitate to contact me.

**Deputy M G O'Hara, Minister**

### **Education Department**

Thank you for your letter dated 9th June, 2015, requesting details of the Education Department's work on the States Disability and Inclusion Strategy since November 2013.

Even before November 2013, Disability and Inclusion issues have been a significant element of the work of the Education Department and Schools. This work continues. The work of the Education Department in relation to this area is enshrined in The Education (Amendment) (Guernsey) Law 1987. A SEN project successfully led to the provision of settings for learners with exceptional additional needs (Le Murier School, Le Rondin School, the CAS bases). The SEN Code of Practice outlines for mainstream schools the processes and procedures to be followed in identifying and addressing the additional needs of learners. The Learning, Performance and Intervention Services within the Department (Sensory Support Services, Communication and Autism Services and the Educational Psychology Service) provide direct services to learners and their families and provide training for Education Service Staff. The Education

Department has a strong network of liaison links with others engaged in the field. Inclusion is a key strand of the Education Department vision.

Given the wealth of aspects of Education Department work that relate to Disability and Inclusion, we would welcome the opportunity, should we be invited, to make a presentation in person to the DISSG.

The Department provides technical support to the Disability and Inclusion Steering Group. This demonstrates its contribution to a multi-agency approach to implementing the Strategy and to help implement the actions laid out in the timetable.

The Education Department also takes the mental health of its staff seriously and has trialled mindfulness training for staff across the service and also worked collaboratively with Guernsey Mind.

With respect to capital works, we have taken the Strategy into account in particular in instances such as the completion of the Les Beaucamps High School rebuild, works at St. Anne's and Vale Primary and, of course, in the planned development of the La Mare de Carteret Schools.

I trust that this information is helpful and assists with the preparation of the States Report.

**Deputy R W Sillars, Minister**

### **Environment Department**

In response to your letter of 9th June 2015 I am pleased to advise you of the work that the Environment Department has undertaken in relation to the Disability and Inclusion Strategy since November 2013, the details of which are set out below:

#### **PLANNING DIVISION:**

##### ***Development Control Section:***

Planning applications are determined in accordance with the planning policies set out in the Urban Area Plan and Rural Area Plan which include policies for safe and convenient access for people with mobility problems, as approved by the States.

Examples of applications which have been approved having particular regard to these policy issues are:

## **St Peter Port**

- Quay/Church Square ramped access
- Market Square ramp (Old but example of major change without harm)
- Old States Offices/Tourist Information Centre – current application following pre-application advice
- Barclay's private bank- application refused but alternative suggested
- Constables' Office- major changes accommodated by design.

Forest and St Saviours – ramped accesses approved to Parish buildings.

**Houses** – there are examples throughout the Island of ramps/graded accesses having been approved.

**Planning Fees** – there is an exemption from planning fees where development is to provide a means of access or other facilities designed to secure the greater safety, health or comfort of a disabled person - this has been used for e.g. ground floor extension to create new bedroom/wet room; potentially replacement windows where planning permission is required; create parking space/vehicular access; widening pedestrian gate for wheelchair access where application supported by Or/Occupational Health/other medical specialist.

The Development Control section expect new developments *to* demonstrate reasonable access – e.g. flats should have lifts; Vista's at Vazon incorporates access at ground floor and deck levels.

### ***Forward Planning Section:***

In preparing and publishing the draft Island Development Plan the Department has engaged with and responded to the Disability Inclusion Strategy.

**Disability Inclusion Strategy and the Island Development Plan** - The Environment Department has liaised with the Disability Inclusion Strategy steering group and officers as part of the consultation process which informed the policies of the Plan. This helped to form the policies in the Plan.

Following Publication of the draft Island Development Plan a meeting was held with the Guernsey Disability Alliance, including the legislative representative, and also representatives of the Disability Inclusion Strategy Steering Group (Jane Stephens and Arrun Wilkie) when the draft policies of the Plan were discussed. With the agreement of the Group, the Department agreed to add a paragraph to the high level Objectives of the Plan to emphasise the importance of the Strategy (wording below).

*"Through the control of development, the Plan has a significant part to play in removing the barriers that prevent some islanders being fully included in island life. In recent years, the States of Guernsey have developed a much greater understanding of the likely impact of an ageing demographic and has passed a*

*Disability and Inclusion Strategy (November 2013). The Island Development Plan has responded positively to this by seeking to enable a balance to be achieved between conservation and the needs of disabled people, as is demonstrated across the Plan but specifically in paragraph 19.6.3 (Protected Buildings)."*

During submission of initial representations to the Planning Inquiry the Guernsey Disability Alliance has been generally supportive of the approach the Plan has taken.

## **Provisions of the draft IDP**

### **High level support**

This is through the Principal Aim of the Plan and Plan Objective 4 which both seek to maintain and support social inclusivity.

### **Centres policies**

General support subject to criteria for new, and extension, alteration and redevelopment of social and community facilities in centres.

### **General Policies**

GP1 – Supports development that takes advantage of opportunities to improve physical access to open and undeveloped land.

GP5 – Protected Buildings - introduces a balance between the economic and social benefits of development with the special interest of a protected building.

GP8 – Design – requires proposals to demonstrate accessibility to and within a building for people of all ages and abilities and with regard to residential development requires development to offer flexible and adaptable accommodation that is able to respond to people's needs over time (lifetime homes). Also annex 1.

GP14- Allows for home-based employment.

GP18 – Public realm and public art – says that development within areas of public realm will be expected to enhance character and functionality of a locality for the public benefit including through improved accessibility for people of all ages and abilities. The GDA has suggested a slight amendment to the wording of the policy to encompass a wider range of disabilities which Environment has agreed to.

GP19 – Community Plans – will allow the possibility of a community plan for an area for improving disabled access or potentially a wider plan by the disabled community.

IP7 – requires appropriate provision of private and communal parking in accordance with the relevant Supplementary Planning Guidance. The Supplementary Planning Guidance requires appropriate levels of disabled parking throughout the Island.

### **IP9- Highway Safety, Accessibility and capacity**

Requires that proposals take into account the access requirements of people of all levels of mobility and health.

## **Monitoring and Review**

Includes monitoring how the Policies and the IDP is performing in relation to States agreed strategies – including the Disability Inclusion Strategy.

## **Delivery Mechanisms**

Development Frameworks and Local Planning Briefs will consider access issues at the beginning of the design and development process- also Annex III.

### ***Building Control Section:***

Building Control applications are determined in accordance with the Building Regulations and in particular the approved guidance contained within the Guernsey Technical Standards. Part M of the suite of documents concerns matters in relation to the 'Access and use of buildings' and contains details of all the design features that must be incorporated for a buildings access and use for people with mobility problems, including people with sensory impairment.

Along with all of the Guernsey Technical Standards Part M is kept up to date and in line with the latest guidance in the UK. A revised Part M (2015) has just been received from our UK suppliers and we are in the process of reviewing the changes with a view to advising the Board ahead of making changes locally and releasing a 2015 edition of the relevant Guernsey Technical Standard later this year.

**Guidance note** - A Building Control guidance note has been produced 'Vertical Circulation in Non-Domestic Buildings'. Based on a UK document, this has been adapted for local use and is currently being used in house to determine local applications and is primarily aimed at ensuring a consistent view across the section. This document has not at this point been published on the Department's website.

**Part P** – The Department has recently published extensive guidance on the design and construction of 'Roads' (not maintained at the public's expense). Some guidance in relation to the construction of footpaths, particularly at crossing points, has been included in this document.

**Building Control Fees** – there is an exemption from building control fees where building work is to provide a means of access or other facilities designed to secure the greater safety, health or comfort of a disabled person - **this has** been used for e.g. ground floor extension to create new bedroom/wet room; potentially replacement windows where a building control licence is required; access; widening door openings for wheelchair access, the provision of a level threshold and for a ramp.

The Building Control section expect new developments to meet the requirements of the Regulations in terms of access into and around buildings. Where facilities are

provided within a building it is generally expected that those facilities should be accessible to all building users including employees.

### **ENVIRONMENTAL SERVICES UNIT:**

Within the Environmental Services Unit, the development of the new playground at Saumarez Park took account of the requirement to provide, as far as reasonably practical, an all-inclusive play area.

At Candie Gardens, disabled parking is allowed by arrangement and operated through Museum staff on-site.

Easy access has been provided at some viewpoints, e.g. Jerbourg and Pleinmont.

### **TRAFFIC AND TRANSPORT SERVICES UNIT:**

The Traffic and Transport Services Unit has undertaken specific workstreams incorporated within the 2014 States approved Integrated Transport Strategy, with regard to disabled access as set out below:

- The Department's Active Travel Unit has a database of disabled group members and individuals which it uses for consultations and engagement;
- Printed materials are available on [www.gov.gg](http://www.gov.gg);
- The Department's Active Travel unit uses social media for communicating positive messages and inviting feedback from the disabled community;
- The Department regularly issues media updates in relation to matters of special interest groups;
- The Department has approved four Accessible Taxi plates in a new category that are tied to the use of an accessible vehicle. A further four plates may be issued if demand suggests there is a need;
- The new Bus Contract was tendered on the basis of methodology statements. One of the statements required for tenderers concerned the methods that would be adopted to meet the needs of disabled people. The tendered method statement is now being implemented;
- The Department has introduced a policy that whenever possible dropped kerbs and blister paving are installed at unofficial crossing points and as part of remedial or new works;
- The Department has developed a new training programme of disability equality training for accessible taxi drivers;
- A programme of improvements at signalised and zebra crossings to ensure that the height of the kerbs adjacent to the crossings have been dropped to make it easier for wheelchair users to use the crossing;
- Blister paving is also installed on approach to either side of zebra crossings to assist anyone with visual Impairment as part of remedial or new works;
- Added additional disabled bays installed where there is a demand;
- A safety review of unofficial crossing points such as at the Town Quay;



- Worked with property developers to install new pedestrian facilities as part of new development projects,
- The Department's Active Travel unit consult and liaise with a Rights and Access Consultant in relation to access matters;
- The Department's Active Travel unit engage regularly with the Guernsey Disability Alliance and the States Disability Officer in relation to positive media opportunities and consultations;
- Using social media for communicating positive messages and inviting feedback from the disabled community.

I trust that this information meets with your requirements.

**Deputy Y Burford, Minister**

### **Health and Social Services Department**

I write further to your letter of 9<sup>th</sup> June requesting details of how the Health and Social Services Department (HSSD) has implemented the Disability and Inclusion Strategy and apologise for the delay in response.

I cannot hope to capture all of the work that is being undertaken that may relate to delivery of the Disability and Inclusion Strategy, but I have set out progress on some key work streams that are highlighted as priorities in the Strategy.

### **Autism Framework**

The Department has been working in partnership with Autism Guernsey and the National Autistic Society to develop a Framework for implementation of the Disability and Inclusion Strategy in relation to people with Autism.

The Department has recently agreed a Service Level Agreement with an Autism Specialist for 18 months consultancy to assist us to develop the Framework and has developed the terms of reference for a project lead. By the end of September 2015 we will have a clear timeframe and project plan for implementation, which will cover the development of a life-long care pathway for children and adults.

The Department's intention has been to focus on the Autism framework first and then to use that as a template for initiating frameworks for learning disability and communication difficulties. Work is ongoing to identify a project lead for the learning disability framework and the communication difficulties framework. This work will conclude at the end of September and leads will be appointed.

At the same time initiatives are being implemented to improve support and services with immediate effect rather than wait for the Framework. Some of this work is detailed below.

## **Disability Accommodation Review**

The Department is reviewing its existing accommodation services to ensure that they are fit for purpose and promote choice, inclusion and the wellbeing of adults with learning disabilities.

One of the biggest achievements over the last 2 years has been the resettlement of Learning Disabled service users from traditional long stay residential homes. In 2013 we had 61 service users living in residential care (some inappropriately placed). Today we have 26 service users in residential care and we support 47 service users in their own properties with bespoke packages of care.

Ongoing partnership work with Guernsey MENCAP has ensured that Pedvin Street (5 flats for Adults with a learning disability) will be refurbished by December 2015.

Work is underway in liaison with the Guernsey Housing Association and Create design team, the National Autistic Society and Autism Guernsey to design a purpose built autism specific unit. The unit is due to be completed 2017/ early 2018. The design will consist of eight self-contained flats and will give us the capacity to return six service users from off island placements into appropriate accommodation that supports their needs.

## **Service Culture Change**

Over the last 20 months the adult disability teams have implemented Active Support training across residential services, and evaluated the outcomes. Active Support is a model of support that focuses on *enabling* people to take part in activities and relationships. It focuses on how service users and staff interact and communicate, and the evaluation has demonstrated improved service user engagement and active participation across all services.

## **Dementia Framework**

A Clinical Nurse for Dementia has been identified to lead on the framework development and a timetable and project plan will be completed by the end of 2015.

## **Capacity Legislation**

In accordance with the Resolution of the States of 27th November 2013, HSSD is currently developing capacity legislation. It is intended that this legislation will cover areas such as:

- deciding whether or not a person has capacity to take a decision,
- allowing a person to appoint another person to act on their behalf if they lose capacity to take decisions,

- allowing a person to take legally binding decisions regarding their medical treatment after they have lost capacity, and
- what can be done when a person has lost capacity without appointing another person to take decisions on their behalf or without making legally binding decisions regarding their medical treatment.
- allowing HSSD to authorise significant restrictions to those people who lack capacity and require their liberty to be deprived and to provide appropriate safeguards

An initial round of consultation has taken place, to include service users groups, and a draft Policy Letter is being worked on for anticipated submission to the States of Deliberation in December 2015.

### **Oberlands Mental Health and Wellbeing Unit**

The new Oberlands Mental Health Unit will open in November 2015, and has been specifically designed to promote inclusion and engagement and to reflect the comments of service users about how best to meet their needs. Both the building design and the operating model are based on best practice evidence about positive user experience and improved outcomes for patients. For example the use of open spaces and light as well as wide corridors to enable disabled access as standard throughout. The Service Users group will continue to be fully involved in the management and development of the service provided from the new buildings complex.

### **Overlap with other Strategies**

As you will no doubt be aware, the HSSD also has commitments against other related strategies, in particular the Supported Living and Ageing Well Strategy, the Children and Young People's Plan and the Mental Health and Wellbeing Strategy. Some key projects that would likely also support the Disability and Inclusion Strategy include:

#### ***Children and Young People's Plan:***

- a clear focus on inclusion as a key principle embedded in the Plan
- improved consultation and initiatives to support ongoing participation of children with disabilities and their parents or carers;
- initiatives seeking to improve equality of access to educational, sporting, cultural and leisure activities

The Plan is still in draft and will be completed by the end of the year for debate by the States in February 2016.

***Supported Living and Ageing Well:***

- The Department is currently putting together a business case for the transformation of community services to provide a reablement service - taking a more person-centred approach to support people's independence and choice in the services they receive and reducing the need for formal care and support;
- Reviewing and reforming the provision of equipment to better support independent living for those with physical disabilities

***Mental Health and Wellbeing Strategy:***

- The Department is developing a project plan and timetable for driving forward the Mental Health and Wellbeing Strategy, of which the Oberlands development mentioned above is a key strand.

A key issue that we have is in amalgamating these various strategies into a clear set out of objectives and outcomes for HSSD to implement. The Department is currently developing a comprehensive delivery framework and prioritisation programme for wholesale reform of its services that will accommodate the above strategies and identify the resources that will be required to deliver. As you will be aware, the Department has been systematically reviewing its service provision and has undertaken a comprehensive cost analysis and benchmarking exercise to identify where the key priorities for change are.

Further, I am sure you will appreciate that the Department's staff are predominantly focused on operational delivery, which demands priority due to the high stakes consequences when things go wrong. In each of the above-mentioned projects the Department has managed to commission some dedicated resources to deliver them through creatively working across departments, with the third sector, commissioning independent expertise where necessary, and through HSSD staff taking on additional responsibilities and really going the extra mile. However, progress in doing so has been slow due to the difficulties of allocating finances from already overstretched budgets; the numerous structural and leadership changes that the Department has undergone in recent years; the difficulties in recruitment; and the reliance in most instances on cross-departmental working.

In the past there has been a tendency to take policies or legislative provisions to the States for approval and then it becomes a problem for departments to work out how to implement them without any increase in resources to do so. I note and draw comfort from the offer in your letter that the Steering Group is happy to act as a resource to any Departments in pursuing work in implementation of the Strategy. I would support in future increased cross-departmental working and a coordinated reporting of progress to the relevant political committees and then to the States where relevant. In particular, the Department looks forward to a States-wide coordinated approach to the work to identify a project plan, timetable and resources for meeting the requirements of the new legislation.

**Deputy P A Luxon, Minister**

## **Home Department**

Thank you for your letter dated 9<sup>th</sup> June 2015 requesting an update in respect of the Home Department's work in support of the Disability & Inclusion Strategy.

I set out details of the Department's work below and as they relate to Resolution 11 of the 2013 Report (Billet D'Etat XXII).

- a. Contribute to a multi-agency approach to implementing the Strategy where their assistance is required and, in particular, to implement the actions laid out in the timetable;**

The Home Department remains very supportive of all opportunities to work collaboratively in order to achieve positive outcomes for the local community.

- b. Take account of the Strategy when developing strategies, policies, plans, procedures and when making changes to services or capital works;**

In anticipation of the Disability & Inclusion Strategy's development, the Criminal Justice Strategy was designed to feature a specific strategic commitment to "equality of access to justice, including physical access and anti-discriminatory practices." There is an action plan that sits behind this strategic commitment and related to the CJ Strategy's key outcomes. This action plan is the main, though by no means exclusive, interface point for the CJ Strategy and the Disability & Inclusion Strategy. The Head of Policy & Strategy and the Criminal Justice Strategy Coordinator have met with the Disability & Inclusion Strategy Steering Group to invite shared ownership of this action plan and is pleased to acknowledge that this suggestion was favourably received. The Home Department notes, however, that there will be key actions and initiatives that may be considerations for the CJ Strategy in isolation. For example, from an access to justice perspective, individuals for whom English is not their first language will need to be a consideration for the CJ Strategy but not necessarily the Disability & Inclusion Strategy. The Department looks forward to the development and delivery of the CJ Strategy's commitment in conjunction with the Disability & Inclusion Strategy.

- c. Note the requirement to provide for reasonable adjustments under existing budgets, when legislation is introduced."**

The Home Department remains supportive of this requirement.

I should also acknowledge that the Home Department currently has responsibility for delivery of Resolution 8 of the same report, namely "to lead the development

of policies and procedures for safeguarding vulnerable adults in conjunction with other States Departments, reflecting those already in place for children."

Since 2013, the Home Department has sought to administer its own responsibilities under this Resolution by conducting preliminary research into prospective solutions but with it always in mind that key decisions are not Home's to make in isolation in view of the fact that the Health & Social Services Department ("the HSSD") sits on the front line of safeguarding services and is clearly a significant stakeholder within any safeguarding initiative.

At their Business Planning Day on 24<sup>th</sup> November 2014 Department Members agreed that, in view of the breadth of knowledge and professional expertise within the HSSD, this work-stream could perhaps be best led by the HSSD with the Home Department remaining as a key stakeholder, and also that any research Home conducted whilst appointed lead would be very willingly shared with any prospective new lead in order to put them on a supported footing to move forwards. At the time, the Home Department Board acknowledged that current HSSD Members were new to post following their election on the 29<sup>th</sup> October 2014, and that the timing may not therefore have been considered opportune for the Home Department to approach the HSSD to ascertain its interest in this proposal.

Acknowledging the positive developments that the HSSD is leading in relation to the safeguarding agenda for children, and also the commitment of resource to the vulnerable adults agenda in the appointment of a new Safeguarding Advisor for Adults, the Home Department remains of the view that lead responsibility for this work may be better placed with the HSSD so that the safeguarding agenda may be seamlessly developed. The Home Department Minister wrote to the HSSD Minister on 22nd May 2015 and it is understood that the HSSD supports this transfer. A Resolution has accordingly be included for debate in the Policy Letter currently being drafted for debate in September.

A staff discussion paper was drafted and shared with the HSSD in respect of how the future of safeguarding vulnerable adults could look. This paper has also been shared and discussed by the Home Department's designated lead officer with the Disability & Inclusion Strategy Steering Group, and comments have also been gratefully received from the Founder and Non-Executive Chair of the Guernsey Disability Alliance. To date a Home Department lead officer has been working closely with the Safeguarding Advisor for the HSSD and also the Director of Environmental Health, by virtue of her lead responsibility for the development of Regulation of Care legislation. This project team continues to scope relevant existing and planned workstreams across the States of Guernsey so that a suitable gaps analysis may be conducted to inform the delivery of the Resolution going forwards. Should the Resolution to transfer lead responsibility to the HSSD be approved, this work will willingly be handed over to the HSSD's designated lead officer to continue.

I trust that the information provided in this letter demonstrates the Home Department's support for the Disability & Inclusion Strategy and its efforts to deliver it.

**Deputy F W Quin, Deputy Minister**

### **Housing Department**

Thank you for your letter of 9<sup>th</sup> June 2015 asking for details of the work that the Housing Department has undertaken in relation to the above Strategy.

I am pleased to report that since the Strategy was approved by the States in November 2013 the Department has:

- Opened two extra care housing schemes in St. Martin's and the Vale;
- Changed its social housing eligibility criteria so that more disabled people can access the Department's social rented housing; and
- Revised its allocations policy to 'fast track' applicants with physical and mental disabilities.

To take each in turn:

#### **Extra care housing**

At time of writing 26 disabled people, including people with learning disabilities, have moved from Health and Social Services Department accommodation into extra care housing, where they can live more independently. Further are expected as the two schemes expand in 2015 and 2016.

Extra care housing has also been made available to disabled people who were living in the community, either by themselves or with their families.

#### **New eligibility criteria**

Now, working age adults with physical disabilities but no dependents are eligible for rented accommodation managed by the Housing Department and the Guernsey Housing Association, as opposed to just the latter.

#### **Revised allocations policy**

When they apply for social housing, disabled people living in accommodation which does not meet their needs are now given greater priority than before. In combination with the new rules governing access to Housing Department properties (see above), this has meant that, on average, disabled people are likely to be offered suitable accommodation more quickly than before.

I am happy to provide further details on any of the above.

**Deputy D B Jones, Minister**

### **Public Services Department**

I am writing in response to your letter of the 9 June 2015, in which you asked for an update on work undertaken by the Public Service Department (PSD) since November 2013 in relation to the Disability and Inclusion Strategy.

By their nature, some of PSD's sites present difficulties for disabled access. However, measures for reasonable adjustment are fully embedded where possible, such as assistance facilities at locations providing transport services such as Guernsey Harbours and Guernsey Airport, and full access to customer service facilities at the head offices of public service providers such as Guernsey Water and States Works.

In addition, Guernsey Airport has been working with Aurigny and the Guernsey Disability Alliance to improve information for passengers pre and post flight and the existing policies and training are in the process of being reviewed with the States Disability Officer.

The new policy will include clear advice for passengers to secure assistance from the car park to the aircraft, with a combined responsibility between ourselves and the airlines being more clearly defined. In addition we anticipate some be-spoke training for staff on disability issues and Aurigny has committed to attend those sessions with its training staff.

We are also looking at whether any future development of the terminal could include bespoke 'changing places' facilities – which would provide assistance for the most disabled passengers with provision of a wet room with hoist and other changing facilities. This would represent a significant investment and external support or funding for fit out may be required.

In addition to physical measures to improve accessibility, billing entities such as Guernsey Water, States Works and Guernsey Harbours accept payments via a number of routes such as direct debit, online or via telephone.

The Department realises that more can be done and has focused on helping to address some of these areas as directed by the States in resolution 11 of the 2013 report. The Department's corporate strategy provides for the 2013 resolutions, and includes a key objective to review the equality of access to PSD's services and infrastructure (including pricing strategies) for the disabled and more vulnerable members of the community. This objective is led by the Department's Finance Business Partner, who has responsibility to ensure that a review is conducted, along with an accessibility survey of PSD properties and establish an action plan of prioritised work to implement reasonable adjustment if necessary.



Alongside this, the Department is developing a number of Key Performance Indicators that focus on progress against the review and audit of equality of access to the Department's services and infrastructure.

As ever, the Department stands ready to assist the Disability and Inclusion Strategy Steering Group as necessary to deliver this important work.

**Deputy S J Ogier, Minister**

**Social Security Department**

Thank you for your letter dated 9 June 2015.

In relation to the Disability and Inclusion Strategy Governance Structure and the workstreams to change attitudes and raise awareness, you will be aware that Social Security is taking the lead on supported and mainstream employment. In order to give transparency to the collective activities of all agencies under this workstream, the Department has developed a framework listing the services currently provided and setting out some of the challenges, gaps in provision and future developments. This framework is updated periodically at the request of the Disability and Inclusion Steering Group and the latest version is attached for your information.

With regard to the specific objectives of improving opportunities for disabled people and carers to participate across society and promoting more positive and inclusive attitudes towards disability in the community, Social Security has been involved in numerous workstreams and activities since November 2013. In connection with Resolution 11 of the 2013 report the relevant workstreams and activities are set out in the table below.

<p><i>a) contribute to a multi-agency approach to implementing the Strategy where their assistance is required and, in particular, to implement the actions laid out in the timetable,</i></p>	<ul style="list-style-type: none"> <li>• Officer lead for supported and mainstream employment.</li> <li>• Officer attendance at meetings and workshops in connection with other workstreams, such as Capacity legislation and Safeguarding Vulnerable Adults.</li> <li>• In connection with the disability register, officer attendance at the multi-agency 14+ transition group.</li> </ul>
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<p><i>b) take account of the Strategy when developing strategies, policies, plans procedures and when making changes to services or capital works,</i></p>	<ul style="list-style-type: none"> <li>• The Primary Care Mental Health &amp; Wellbeing Service (PCMHWS) established on a permanent basis following completion of a successful 2 year trial period.</li> <li>• Implemented changes to Carer's Allowance which mean that there is no longer any restriction of the level of earnings a carer can receive while getting Carer's Allowance.</li> <li>• Progress to Work project implemented giving effect to 2012 States Resolutions to introduce work incentivisation within the supplementary benefit scheme. Work-focused meetings now carried out with all people of working age, including non-working partners. Officers take account of disability-related matters within the work-focused approach and with regard to setting work rehabilitation plans.</li> <li>• Supporting Occupational Health &amp; Wellbeing (SOHWELL) project implemented. This project has transformed the way in which the Department deals with sickness claims and is focused upon earlier intervention to support people who may need extra help to stay in work or get back to work more quickly. Using the expertise of a Consultant Occupational Health Physician and Accredited Specialist in Occupational medicine, the Department has changed the way incapacity for work is assessed and has also redesigned the medical certificate to support occupational health and workplace adjustments. In support of these changes, the Occupational Health Consultant has delivered bespoke training to local GPs and other healthcare professionals.</li> <li>• Implemented a Third Sector Grant Scheme to encourage voluntary organisations who have clients of</li> </ul>
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	<p>working age to develop work rehabilitation initiatives to help people stay in work or return to work more quickly.</p>
<p><i>c) note the requirement to provide for reasonable adjustments under existing budgets, when legislation is introduced.</i></p>	<ul style="list-style-type: none"> <li>• The Department fully subscribes to the concept of reasonable adjustments. The Department has made both temporary and permanent adjustments for staff in the past, and is currently in the process of making adjustments to respond to new issues that have arisen for existing staff.</li> <li>• The Department welcomes the change in legislation and believes that the work it is doing through the SOHWELL project go some way towards supporting other Departments and the private sector.</li> </ul>

I hope that the above information and enclosure are helpful, but if you need further information please ask Carol Le Page to liaise with Ed Ashton, Deputy Chief Officer in the first instance.

**Deputy A H Langlois, Minister**

**States' Assembly & Constitution Committee**

Please include the changes which will be made to the Reform Law to remove Legal Disability. The Committee will also be making new Rules regarding the presence of candidates and their representatives at elections counts. At present a representative cannot be subject to the Legal Disability. The Committee will also remove that barrier.

The Committee also plans to run "Community Awareness" training for States' Members as part of their induction programme (along the lines of Dignity at Work / diversity training for civil servants) to make them more aware of the need to respect the diverse nature of the Guernsey population.

In terms of the present Union Civile proposals, it is likely that the only obvious effect on the Committee may be a need to amend the wording of any reference to “spouse” or similar in the various Rules applying to the States.

I trust the above is helpful but please do not hesitate to contact me should you require any further information.

**A Nicolle, Principal Officer**

### **Treasury and Resources Department**

Thank you for your letter of 9<sup>th</sup> June, 2015, in respect of the above. Please accept my apologies for the delay in replying.

There are a number of areas within the Department’s mandate where work is underway that takes account of the Strategy. These include the following:

#### **States Property Services (SPS)**

As a matter of course, when undertaking refurbishment works for properties under its direct control, SPS always now considers the opportunities for adaptations to assist disabled people, such as wider door openings, improved visibility of building features for the visually impaired and so forth.

By way of example, the Department currently has planning applications for a disabled ramp for the Guernsey Information Centre and a new disabled accessible toilet at the Portelet kiosk. SPS has also undertaken an upgrade of a number of existing public conveniences for disabled people to ensure that they comply with Part M of the Environment Department’s Guernsey Technical Standards relating to accessibility for disabled people.

In addition, when supporting other Departments with their capital construction projects, SPS will work with them where necessary to ensure that proper consideration has been given to the inclusion of such adaptations within their plans.

#### **Information Technology Unit (ITU)**

ITU continues to follow the accessibility standards for websites set by the World Wide Web Consortium (W3C) which provides guidelines and testing to ensure that online content meets the needs of the visually impaired in terms of layout, contrast levels and compatibility with assistive technology, such as screen readers that allow websites to be navigated using a text-to-speech facility. The target is to achieve a minimum of the W3Cs “AA” standard for all online systems and websites provided for the public. Whilst this represents the second-highest tier of accessibility, W3Cs own guidelines state that *“It is not recommended that Level AAA conformance be required as a general policy for entire sites because it is not possible to satisfy all Level AAA success criteria for some content.”*

ITU also seeks to maintain accessibility standards through rigid adherence to the “HTML” standards that govern how webpages are constructed, as this also assists those developing assistive technology.

### Income Tax

You will be aware that the Department has embarked on an Income Tax Improvement Programme. As part of this initiative, a Customer Advisory Forum has been established and arrangements have been put in place to ensure that the interests of disabled people are represented through the membership of this body.

### The Hub

The customer services counters (cashiers/payments) on level 2 at Sir Charles Frossard House have been redesigned. The counters now incorporate split levels, with the lower one accommodating the needs of wheelchair users. Each counter now also accommodates those requiring hearing loop access.

In addition, the work that has been undertaken recently to refresh the recruitment portal included steps to ensure it works with all devices and browsers (including third party applications users may have installed such as magnifying and speaking pages applications).

### Procurement

All tenders for States’ contracts are conducted using standard procurement documentation. A default requirement has been incorporated within this documentation to require bidders to demonstrate compliance with the States’ Disability and Inclusion policies that may be applicable to the project concerned.

In addition, the Department’s standard procurement documentation that is available across a variety of sources, including The Bridge, is being updated in accordance with accessibility guidelines around font type, font size, layout, justification and alignment etc.

I trust that the above is helpful.

**Deputy G A St. Pier, Minister**