

Carlow Local Authorities



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Audit of Information and Services 2008

Summary

Towards Universal Access for All

Introduction

Definition and Purpose of Audit

We define an audit as a systematic examination of a building, product or service to assess compliance against an agreed standard. The standard for this audit has been based on two existing Irish standards in relation to accessible services and information, the Excellence through Accessibility (Eta) Award guidelines and criteria and the Code of Practice on Accessibility of Public Services and Information provided by Public Bodies. In both cases the standards were developed by the National Disability Authority (NDA).

The National Disability Authority was established in June 2000 as an independent Statutory Body with a number of functions in relation to disability including *“to support the achievement of good standards and quality in the provision of programmes and services provided or to be provided to people with disabilities”*

The Excellence through Accessibility Awards recognise and reward public sector organisations that comply with the Eta standard. Compliance with the Code of Practice is accepted as compliance with relevant sections of the Disability Act 2005, i.e. sections 26, 27 and 28 that relate to measures to make services and information accessible to people with disabilities.

The purpose of this audit is to assess to what extent Carlow Local Authorities provide accessible services and information to people with disabilities when examined against the standards as outlined above.

Legal Context

In the Department of the Environment, Heritage and Local Government Sectoral Plan of 2006 Local Authorities are required to carry out an access audit of the built environment. Section 4.2.2 of the Sectoral Plan says “*The accessibility audit will also cover access to services and information in accordance with sections 26-28 of the Disability Act 2005 and the Code of Practice issued by the National Disability Authority under section 30 of the Act*” (P.30)

Methodology

Two questionnaires to be administered by telephone were developed by Webster Lawlor & Associates. The first questionnaire was designed to capture responses about systemic and/ or cross cutting plans, policies, procedures and roles, in essence the more strategic elements of planning for access in terms of services and information. The second was designed to capture responses at a local level in relation to accessible information and services.

Items were based on the Excellence through Accessibility Award guidelines and criteria and the Code of Practice on Accessibility of Public Services and Information provided by Public Bodies.

A central point of contact at Senior Executive level within Carlow County Council was assigned and the services and service locations in Carlow Local Authorities were identified. The role of the central contact was to identify other key personnel for interview, to facilitate the interview process and to provide documentary evidence to support responses provided during the telephone interview process. The central point of contact was also the respondent to the centralised questionnaire.

A local point of contact for each service was identified and in each case the point of contact was a relatively senior member of staff deemed to have a comprehensive overview of the services and information provided in their service area to people with disabilities. A telephone questionnaire was administered in each case and respondents were asked to cite evidence to support their responses. Wherever possible responses provided during the telephone questionnaires were checked for evidence by reference to Carlow Local Authority documents and web site. In some cases responses were also cross referenced with the Carlow Local Authorities implementation plan and with results from access audits of the built environment.

One limitation of this methodology is the fact that responses were sought from one representative per service only and as such their perceptions may not be representative of the service area as a whole. However every effort was made to cross check regarding factual information as outlined above. The questions asked related in many cases to the information and knowledge staff have about the accessibility of services and information and therefore this methodology was deemed to be the most effective way of eliciting this information. The selection of a senior staff member in each location for interview was designed to ensure that the information gathered was provided by an individual with as much knowledge as possible of both local and central systems.

The resulting completed questionnaires were content analysed to draw out key areas of good practice or those in need of action to ensure compliance with the Disability Act 2005. Recommendations in this report are made based on the data gathered during the auditing process. We envisage that these recommendations will provide a forum for discussion within the Universal Access Implementation Team which includes representation by people with disabilities and will result in actions being included in the Carlow Local Authorities Disability Implementation Plan and taken on that basis.

Scope

One central questionnaire and 17 local questionnaires were administered. Table 1 outlines the range of service locations that were included in this audit process.

Table 1: Locations of Services Audited

Location	Number
County Hall - Carlow	8
Town Hall Carlow	1
Assembly Rooms Carlow	1
Carlow Fire Station	1
Central Library – Tullow Street, Carlow	1
Library – Link Road, Tullow	1
Library – Main Street, Bagnalstown	1
Tullow Area Office	1
Tullow Civic Offices (Housing)	1
Bagnalstown Area Office	1
Total	17

Services

The range of services in the above locations that were audited were Arts, Roads/ Planning/ Water, Water Services and Sewage, Carlow Town Council, Carlow Fire Services, Community and Enterprise, Finance, Library (3), Housing, Planning, South East River Basin, Motor Tax, Corporate Services and HR, and Environment. Representatives from IT services and the Sports Partnership provided information that is not included in the audit results but is reflected in the conclusions and recommendations.

Recommendations

Recommendations are provided based on the results of the audit. They are ranked on two levels, the first being priority and the second being the timeline within which we believe they should be achieved. The priority of recommendations is rated as High, Medium or Low. The timeline given to implement the recommendations are given as short, medium or long. This is to take account of cost and complexity factors. For example it may be deemed to be a priority to provide tracking data about what services customers use, what mode of communication they use etc but it is also relatively expensive and complex to capture all the relevant data required. In this way a recommendation may be seen as a high priority but may have a medium or long timeline. In our opinion all recommendations that are prioritised as high and with a short timeline are achievable by the end of 2009 and in most cases by the end of 2008.

We envisage that these recommendations will provide a forum for discussion within the Universal Access Implementation Team including representatives of people with disabilities and will result in actions being implemented in the Carlow Local Authorities disability implementation plan.

Recommendations

Systemic Level

Overall Carlow Local Authorities have achieved a relatively high level of accessible buildings and services. However the most significant challenge now lies in ensuring access is built into all plans and decisions going forward and the importance of adopting a systematic disability proofing approach cannot be over-estimated.

- Amend the customer charter and state that Carlow Local Authorities are committed to providing buildings, spaces and facilities that are accessible. This is contained in principle 3 of the Customer Service Action Plan but is not reflected in the charter itself.
- A customer charter to be displayed prominently in every public office
- Provide an easy to read version of customer charter. One way to do this is to engage with local providers of services to persons with intellectual disabilities and ask them if they will join in a partnership approach where they will produce a draft. Alternatively engage an external provider to produce same.
- Develop an understanding of the concept of disability proofing, stages in proofing, using impact assessment tools and how disability proofing may be implemented within the Local Authority. Begin by identifying key staffs within the Local Authority to attend a disability proofing workshop. Please note that Circular LG02/07 requires County Development Boards to "...adopt disability as a key theme and to actively engage in promoting co-ordination between the relevant service providers in their area with regard for persons with a disability". Disability proofing is a key tool that can be used to achieve this goal.

- Equality (disability) proof all relevant policies and procedures to eliminate discrimination and to promote positive action wherever possible. This reflects the commitment made by Carlow Local Authorities within the principle of equality/ diversity in the Customer Service Action Plan.

Management Level

The high level of staff comfort in relation to disability issues was noteworthy and there was a general “can do” attitude. However in relation to the practical issues of access and disability, responses were mixed. In order to ensure all service responses are consistently high across all services there is a need to develop and/ or amend some policies and procedures.

- Develop a procedure to guide staff in how to respond to a request from a person with a disability including requests for information in accessible formats.
- Develop pro-forma’s that can be used to track requests from people with disabilities and the Local Authority response to those requests. Please Note that similar procedures and pro-forma’s need to be developed in relation to requests from staffs with disabilities.
- The policy on staff communications to be extended to include external communication, i.e. communication with customers
- Amend or develop a parallel complaints procedure to take account of the fact that a person with a disability can make a direct complaint to the Head of a Public body about failure to provide access under sections 26 – 28 of the Disability Act 2005.
- Make public the complaints procedure outlined above, e.g. on the website and in public offices

- List of contacts/ organisations that can supply information in alternative formats and other access supports (e.g. sign language interpreting) available. To include information on lead times, costs etc and made available to staffs
- The policy on Equality and Diversity to be reviewed and amended to specifically refer to customers and to ensure the scope of the policy includes all elements in relation to customers, e.g. harassment/ sexual harassment of customers with a disability
- Existing customer consultation mechanisms to be further developed through the use of customer surveys, listening meetings, customer panels and mystery shopper exercises. Customer panels to be standing committees, customers with disabilities invited to join for a fixed term, terms of reference developed. One action to be taken per year under disability implementation plan regarding listening meetings, surveys and mystery shopper.
- Consultation to be focussed with a consultation agenda for the lifetime of this implementation plan to include:
 - Developing demographic data of local people with disabilities
 - Identifying most frequently used services
 - Identifying most useful alternative formats of information
 - Identifying by type of disability some of the ongoing barriers to service and information from the perspective of the customer with a disability

Data Collection and Tracking

This is an area of high priority. It is very difficult to know how to best serve customer if there is little information about the needs of those customers, potential customer numbers and what services they use. However this can include complex and potentially expensive actions so we recommend that Carlow begin by implementing the first 3 actions below.

- Carry out a survey of people with disabilities in County Carlow in order to compile a demographic profile
- Carry out a “snapshot” survey of key services (e.g. Libraries, housing, planning) in relation to most frequently used elements of service, modes of communication used by customers (e.g. phone, email, face to face) and most frequently requested information
- Consider purchasing a customer profiling system and ensure capacity of this system to capture data in relation to customers who consider themselves to have a disability

Building Capacity

This is an area where Carlow have already devoted considerable resources and the benefits of this in terms of staff attitudes are clear. However there is a significant gap in communicating to staff the positive actions that have been taken and in teaching them how to use and be able to explain what access supports are in place.

- Develop and roll out briefing sessions to the staff in relation to:
 - The name and contact details of the 3 access officers and their role
 - The name and contact details of the Inquiry officer and their role
 - The procedure on responses to requests from customer with disabilities including the timelines for providing alternative accessible information. This procedure to include when/ how to contact the Access Officer
 - Pro forma's to be developed in relation to the above
 - The procedure on Access for public events and / or consultations

- The new complaints procedure under the Disability Act 2005
- The register of service providers that can be accessed and where this can be found
- All access features in their location and any other location that they may currently work from and how to explain these features to a customer with a disability (e.g. loop system, accessible features on kiosk)
- Access features of the website
- How to produce accessible documents including accessible electronic pdf documents
- Any recommendations made and implemented or planned for implementation in relation to the built environment
- Ensure a systematic approach to providing basic disability awareness training to all new staff. Staffs currently display a high level of comfort in relation to serving customers with a disability and this may be attributed to the high level of commitment to staff training in this area. However the benefits may be eroded if new staffs are not trained to the same level.
- Irish Sign language interpreting training to be provided to at least one person in each service and service location. This is to be followed up with an ongoing project with representative organisations of the deaf so that staffs are able to practice skills to ensure they are maintained
- Access Officer and Inquiry Officer to assess training needs in relation to specific roles, e.g. Inquiry Officer for dealing with new complaints process and investigating complaints
- Front line staffs to attend a half-day workshop on serving and communicating with customers with learning difficulties. A lack of knowledge and confidence about how to provide better customer service to people with learning difficulties was regularly mentioned by staffs.

- Train key staff about how to disability proof decision making in relation to buildings, facilities, services and information to the Public
- Assigned members of staffs to attend workshops on how to write plain English/ easy to read English.
- Staff involved in recruitment have attended a workshop specifically on reasonable accommodation for people with disabilities
- Ensure access is mainstreamed into all other training, for example that customer service training also deals with disability related issues.
- Consider assigning a member of staff in each service area and / or location to be an “Access Champion”. This person to attend further training and to act as a local source of expertise
- Register of service providers re supports for accessible services or information to be developed. The register to include contact details, 1 line descriptor of the service, costs and timelines for bookings etc.

Communication with the Public

There is a significant communication gap in terms of Carlow Local Authorities telling their customers what access supports are in place and available. We acknowledge that there has been consultation about the implementation plan but to date there has been no systematic communications campaign to highlight what is available to the customer. This is understandable given that much work has been in progress, however we believe that it is now time to make resources available for a targeted communication campaign. It is vital to partner with people with disabilities in terms of how this is done.

- Develop and roll out a planned and documented communication campaign to the public in relation to:
 - The range of disability related supports that are available to customers from reading documents to customers to making information available in alternative formats on request
 - The role of the Access Officer including how to contact him/ her
 - The role of the inquiry officer and the complaints procedure under the Disability Act
 - Consultation with people with disabilities to be central in developing and implementing this campaign

Accessible Information

The Disability Act 2005 requires the Public Body to respond to a request for information in alternative formats. This demands that the Local Authority has a systematic response including clear procedures (as we have recommended at management level). However a best practice approach would also include the Local Authority finding out more about the specific profile of people with disabilities in their area in terms of numbers of people with disabilities with different types of impairment, level of impairment, geographical spread etc. This recommendation is included in the data tracking section.

The next step is to take that data and consult with representatives of people with disabilities to find out what services they most frequently use and what alternative formats are most useful to them. At this stage the Local Authority can then make an informed decision about how to target their resources in terms of carrying some stock in alternative formats. However there are some actions that Carlow Local Authority can implement in the lifetime of this implementation plan and these are listed below. As more accurate demographic information becomes more available and more targeted consultation takes place actions can be refined.

- Each service should aim to produce 2 documents a year in alternative formats starting with large print and easy to read as these will potentially impact on a large number of customers
- All explanatory notes to be in easy to read format. In cases where services believe their documents are easy to read these should be prioritised for disability proofing
- We are aware that a basic style guide was developed some time ago. However there is very little awareness of its existence and this should be refined and re-introduced to staff in staff briefing sessions
- Ensure the information kiosk in County Hall is in working order each day and that it is re-positioned to a more prominent position. Ensure this is highlighted as part of the publicity campaign to customers (P.13 above)
- The Library service is taking part in a pilot study this year to include using SMS text. Ensure this is evaluated and consider piloting use of SMS text in other frequently used services
- Ensure any promotional video's / films going forward have access features (c.f. procurement policy & disability proofing)
- All customer information to be on website. Member of staff from each service to review/ update on a quarterly basis at a minimum

Procurement

The audit revealed that many good practice items are in progress under this heading, however we have included them in our recommendations below

- Procurement policy to include a statement on accessibility

- Procurement procedures/ guidelines reference accessibility
- Tenders checked to ensure access criteria are met
- References for tendering organisations verified

Human Resources

Overall HR was assessed as relatively accessible and the attendance management programme was of a good standard. The recommendations provided below, if implemented, will take this good practice to a best practice service.

- Specific measures to be used to encourage people with disabilities to apply for positions in the organisation
- The availability of workplace adaptations to be included in job advertisements
- Provide mentoring/ work experience / work shadowing to people with disabilities including those who have acquired a disability and are no longer in employment
- Develop procedures and pro-forma's in relation to providing reasonable accommodation for staffs with disabilities including a reasonable accommodation register.