

Monday 16 September 2019

### **Guernsey Business Groups Call for an Extension to States Consultation**

The Guernsey Branch of the Institute of Directors, the Guernsey International Business Association, the Guernsey Chamber of Commerce and the Confederation of Guernsey Industry (the G4) and the Guernsey branch of the CIPD make the following comment:

The above associations have been working with the Committee *for* Employment & Social Security ('ESS') to gain feedback from our members regarding the consultation by the ESS around the proposed new legislation surrounding discrimination, and we continue to strongly encourage our members to respond to this consultation by the 30 September deadline.

However, we note the concerns raised by those in our organisations over the complexity and wide-ranging nature of the proposals, coupled with the relatively short time for the consultation – most of which took place over the summer holiday - and we would ask that ESS consider an extension to the consultation deadline.

Our members are also keen to see the States' own impact assessment of these proposals so they can use this to inform their own analysis and help shape their response to the consultation. Our members also note that this would also assist in any 'myth busting' and reduce the risk of unintended consequences, such as those experienced following the new Population Management rules.

If this analysis is not yet available, given the wide-ranging nature and complexity of the proposals, we would respectfully request the consultation is extended until it is available. It would seem unfair to expect businesses and the public at large to respond to the consultation in a shorter period than the States, particularly given the States' unique access to skilled resources in order to undertake the analysis.

We have made the assumption that, as the States is both the largest employer in the island and the largest property owner, it has completed or is in the process of carrying out an impact analysis of its own sector. Clearly if this is not the case we would see this as an absolute requirement as part of the States consultation and deliberation of these proposals.