

**A joint statement from Guernsey Institute of Directors, Guernsey Chamber of Commerce, Guernsey International Business Association, Chartered Institute of Personnel Development and the Confederation of Guernsey Industry.**

Following the publication of the policy letter outlining the proposed approach to anti-discrimination legislation, the island's business groups acknowledge the significant amount of work over the last three years that the Committee for Employment & Social Security (ESS) has done to date on this project.

The G4, along with the Guernsey branch of the Chartered Institute of Personnel & Development (CIPD) are all fully in favour of anti-discrimination legislation but have been clear throughout the consultation process that it needs to be proportionate to the island and where possible use legislation that is familiar to Guernsey.

We continue to have concerns over certain critical aspects, for example, the social definition of disability lacks clarity and is likely to be very problematic in interpretation and the separate protected status for carers is not included in the UK or Jersey legislation.

However, we note that the policy letter has a number of significant changes from the original proposals and we are particularly pleased to see the movement to a six-month qualifying period and proportional upper limits on financial compensation.

As previously stated, we believe the whole island community is best served by a version of the Jersey legislation that is adapted for Guernsey, noting that there are factors that are specific to our island. We are therefore very disappointed that ESS has not taken this option forward.

ESS has proposed that the policy letter will be debated in the April States meeting. The G4 and CIPD acknowledge that the architects of this policy are keen to see it passed during this States term, however, in order to have a full and reasoned reassessment of the new proposals, the business groups have requested more time before the policy letter is debated.

The extra time will allow us time to reassess this very weighty and complex document properly, seek the appropriate expert counsel and consult with our members, who collectively represent a large proportion of the island's business community.

We do not believe the April meeting gives neither businesses or any other interested groups (including the individual States departments themselves), sufficient time to analyse and respond to these proposals properly. In addition to the impact on employers, the proposals will also apply to education, goods, services, clubs and societies. It is, therefore crucial that those groups also have sufficient time to understand the implications of the complex proposals fully.

As the States of Guernsey is the island's largest employer and estate owner it will be the most impacted by this legislation. Throughout the review process, we have continued to ask that we have sight of the States' impact analysis to help inform the business community's own considerations. That has not been forthcoming, and we ask again for this analysis.

The business groups firmly believe that anti-discrimination legislation will benefit the whole community and that further delays could be avoided by taking on certain local considerations and adapting the approach to anti-discrimination legislation that Jersey has successfully introduced.