Accessible Information Policy

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Document Control Sheet

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Approval Level:	Board
Dissemination Date:	July 2022	**Implementation Date:**	01 July 2022
Method of Dissemination:	Staff to be notified via newsletter and where it applies directly to patient care, to be disseminated to teams on an individual basis via line Managers.

Document Amendment History

Version No.	Date	Brief Description
Version 1	July 2022	Policy adopted from NHS Telford and Wrekin NHS STW policy of the same name

The formally approved version of this document is that held on the NHS Telford and Wrekin website (https://www.shropshiretelfordandwrekin.nhs.uk/)

Printed copies or those saved electronically must be checked to ensure they match the current on line version.

Contents

1   Introduction

The Equality Act became law in October 2010. The purpose of this was to improve and strengthen, previous equalities legislation covering all of the groups that were protected by this legislation, known as Protected Characteristics, one of which is disability.

The Care Act 2014 also places specific duties on local authorities to provide advice and information in an accessible format meeting the individual's needs.

Despite the existence of legislation and guidance (as outlined above) in reality many service users continue to receive information from health and social care organisations in formats which they are unable to understand and do not receive the support they need to communicate. This includes, but is not limited to, people who are blind or have some visual loss, people who are d/Deaf or have some hearing loss, people who are deafblind, and people with a learning disability[1].

2   Purpose

The Accessible Information Standard (NHS England, revised August 2017) places a requirement on NHS and Local Authority organisations to develop a standardised approach to identifying, recording, flagging and sharing of information relating to patients and their communication needs, where this need arises from a disability, impairment or sensory loss.

This guidance applies to all organisations that provide NHS and social care, including where independent contractors have been commissioned to provide this care. The role of the NHS Shropshire, Telford and Wrekin Integrated Care Board (NHS STW) is to ensure that contracts with organisations they commission set out the requirements of this standard and that performance management arrangements support organisations in implementation. In addition to this where NHS STW provide services, there is a requirement for this standard to be met.

Those who have a communication need should not be put at a disadvantage and this policy sets out a framework for NHS STW staff in meeting individual's communication needs by ensuring that: -

- Individuals have appropriate access to support, so that they understand information that is being shared with them (e.g. access to interpreters or easy read documentation);

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[1] Accessible Information Specification (NHS England, revised August 2017)

- Individuals are involved and able to make decisions about their health, care and treatment;
- Individuals are enabled to participate in the management of their own care needs.

The Accessible Information Standard does not apply to individuals whose communication needs are related to speaking a language other than English, although it is acknowledged that in order to ensure all patients receive the best experience of healthcare in Shropshire, Telford and Wrekin, it would be best practice to record these needs in line with this policy.

3 Responsibilities

3.1 The Chief Executive Officer

The Chief Executive Officer is responsible for ensuring compliance with the guidance set out in the Accessible Information Specification (NHS England, Revised August 2017). The Chief Executive may delegate this responsibility to an executive team member.

3.2 The Executive Team

The Executive Team are responsible for:

- Dissemination of this policy to team members and identifying any training needs via feedback from the Deputy Executive Leads and Senior Commissioning Leads.
- The Lead Executive for this policy is the Director of Corporate Affairs.

3.3 Deputy Executive Leads

Deputy Executive Leads are responsible for:

- Ensuring contracts reflect the Accessible Information Standard (NHS England, Revised August 2017) as set out in the specification.
- Communicating this policy to internal provider teams, so that they are fully aware of the requirements for implementation and deadlines for this.

3.4 Senior Commissioning Managers / Quality Leads

Senior Commissioning Managers are responsible for:

- Ensuring that any internal providers (e.g. Complaints/PALS, Individual Commissioning Team, Referral Assessment Service (RAS), Telford Referral and Quality Service (TRAQS) & Prescription

Ordering Direct (POD) have processes and policies in place in order to meet the required standard.

- Monitoring external organisations compliance with the Accessible Information Standard.

3.5 NHS STW Staff

NHS STW Staff are responsible for:

- Identifying and recording the communication needs of all individuals when they contact the NHS STW, where the NHS STW provides a service directly to patients.

- Alerting other staff members / teams / external commissioned organisations about an individual's communication needs, when there is a need to share information in order to meet service requirements (In line with the Data Protection Act 1998).

- Staff should be aware of this policy and local processes within their service area in order to meet the required standards.

3.6 Committees and Groups

NHS STW direct patient interface services will include information relating to the recording of communication needs within quarterly reports to Quality and Performance Committee via the Insight report, including recording where communication needs have not been determined. The purpose of this will be to identify any gaps in meeting individual needs.

3.7 The NHS STW Board

The Board will receive an annual report as mandated and any variance reports from the Chair of ICB Quality And Performance Committee.

4   Procedures / Processes

4.1   Service User Groups – Who does this Policy Apply to

The policy applies to patients with a disability that affects their communication needs, this includes, but is not limited to: -

- Patient or their relatives/carers with a sensory impairment (d/Deaf or have some hearing loss, blind or have some visual loss, deafblind)

- Patient or their relatives/carers who have a learning disability

4.2   Which Services Does this Policy Apply to

This policy applies to those services within the NHS STW who have direct contact with members of the public as detailed below: -

- Individual Commissioning Team

- Telford Referral and Quality Service (TRAQS)

- Referral Assessment Service (RAS)

- Patient Services Team (Complaints & Patient Advice & Liaison Service (PALS), etc)

- Prescription Ordering Direct (POD)

In addition to these teams the policy applies to anyone involved in the commissioning of NHS services, in that contracts can be monitored to ensure compliance with this standard.

4.3   NHS STW Providers

All NHS STW services that have direct contact with patients or their carers/parents MUST have processes in place to ensure that they **ASK**, **RECORD**, **FLAG**, **SHARE** and **MEET** communication needs: -

- **Communication needs are identified**: a consistent approach to the identification of patients', service users', carers' and parents' information and communication needs, where they relate to a disability, impairment or sensory loss.

- **Where a communication need is identified, needs are recorded and are highly visible:** a consistent and routine recording of patients', service users', carers' and parents' information and communication needs, where they relate to a disability, impairment or sensory loss, as part of patient / service user records and clinical management / patient administration systems;

- **Needs are flagged on electronic and paper based systems to ensure immediate identification:** establishment and use of electronic flags or alerts, or paper-based equivalents, to indicate that an individual has a recorded information and / or communication need, and prompt staff to take appropriate action and / or trigger auto-generation of information in an accessible format / other actions such that those needs can be met.

- **Where a patient has identified communication needs, where there is a need to share information with other organisations, communication needs are to be shared also:** inclusion of recorded data about individuals' information and / or communication support needs as part of existing data-sharing processes, and as a routine part of referral, discharge and handover processes.

- **Where a communication need is identified, steps should be taken to meet those needs:** taking steps to ensure that the individual

receives information in an accessible format and any communication support which they need.

It is the responsibility of each department to review information they hold and give consideration to what formats this is already available in. Where documentation is not already provided in alternative formats (e.g braille, easy read, large print) departments will need to request appropriate translation on an as required basis.

Details of translation services can be obtained from the Patient Services Team.

4.4   Commissioned Services

Commissioners MUST ensure that their commissioning and procurement processes, including contracts, tariffs, frameworks and performance-management arrangements with providers of health and / or adult social care reflect, enable and support implementation and compliance with this standard.

Commissioners MUST seek assurance from provider organisations of their compliance with this standard, including evidence of identifying, recording, flagging, sharing and meeting of needs.

5   Related Documents

The following documents contain information that relates to this policy:

- Accessible Information Standard Specification (NHS England)
- Accessible Information Standard implementation guidance (NHS England)
- Equality Act 2010
- Care Act 2014
- Data Protection Act 1998

6   Dissemination

These guidelines will be disseminated by the following methods:

- Executive Leads – to disseminate within their areas
- Staff - via News Flash bulletin / article
- Published to the Website
- Awareness raising by the Patient Services Team

7   Advice and Training

7.1   Advice

If any advice is required in relation to this policy please contact: -

Patient Services Team
NHS Shropshire,Telford & Wrekin
Halesfield 6
Telford
Shropshire
TF7 4BF

Tel: 01952 580407
Email: stw.patientservices@nhs.net

7.2   Training

Managerial leads for NHS STW services listed in 4.2 are responsible for ensuring that all staff are trained, understand and are able to meet the requirements of the Accessible Information Standard, in line with their local processes.

8   Review and Compliance Monitoring

Commissioners MUST seek assurance from provider organisations of their compliance with this standard, including evidence of identifying, recording, flagging, sharing and meeting of needs.

8.1   Compliance Monitoring

The NHS STW will assure itself of compliance via reporting within the quarterly Quality and Performance Committee.   Deputy Executives for Commissioning will monitor compliance via contractual arrangements.

9   Glossary

Term / Abbreviation	Explanation / Definition
Accessible Information Standard	NHS England guidance relating to how health and social care should meet the needs of individuals with communication needs.
Alternative format	Information provided in an alternative to standard printed or handwritten English, for example large print, braille or email.
Braille	A tactile reading format used by people who are blind, deafblind or who have some visual loss. Readers use their fingers to 'read' or identify raised dots representing letters and numbers. Although originally intended (and still used) for the purpose of information being documented on paper, braille can now be used as a digital aid to conversation, with some smartphones offering braille displays.

	Refreshable braille displays for computers also enable braille users to read emails and documents.
Carer	Anyone who cares, unpaid, for a friend or family member who due to illness, disability, a mental health problem or an addiction cannot cope without their support.
NHS Shropshire, Telford and Wrekin Integrated Care Board (NHS STW)	Organisation responsible for commissioning health services in a specific area. NHS STW commissions services for the Shropshire, Telford & Wrekin area.
Commissioners	Organisation/Individual responsible for commissioning services.
Communication Needs	Needs that have an impact on an individual's ability to communicate effectively, without additional support.
d/Deaf	A person who identifies as being deaf with a lowercase d is indicating that they have a significant hearing impairment. Many deaf people have lost their hearing later in life and as such may be able to speak and / or read English to the same extent as a hearing person. A person who identifies as being Deaf with an uppercase D is indicating that they are culturally Deaf and belong to the Deaf community. Most Deaf people are sign language users who have been deaf all of their lives. For most Deaf people, English is a second language and as such they may have a limited ability to read, write or speak English.
Deafblind	The Policy guidance Care and Support for Deafblind Children and Adults (Department of Health, 2014) states that, "The generally accepted definition of Deafblindness is that persons are regarded as Deafblind "if their combined sight and hearing impairment causes difficulties with communication, access to information and mobility. This includes people with a progressive sight and hearing loss" (Think Dual Sensory, Department of Health, 1995)."
Disability	The Equality Act 2010 defines disability as follows, "A person (P) has a disability if — (a) P has a physical or mental impairment, and (b) the impairment has a substantial and long-term adverse effect on P's ability to carry out normal day-to-day activities." This term also has an existing Data Dictionary definition.
Easy read	Written information in an 'easy read' format in which straightforward words and phrases are used supported by pictures, diagrams, symbols and / or photographs to aid understanding and to illustrate the

	text.
Impairment	The Equality and Human Rights Commission defines impairment as, "A functional limitation which may lead to a person being defined as disabled..."
Interpreter	A person able to transfer meaning from one spoken or signed language into another signed or spoken language.
Large print	Printed information enlarged or otherwise reformatted to be provided in a larger font size. A form of accessible information or alternative format which may be needed by a person who is blind or has some visual loss. Different font sizes are needed by different people. Note it is the font or word size which needs to be larger and not the paper size.
Learning disability	This term has an existing Data Dictionary definition and is also defined by the Department of Health in Valuing People (2001). People with learning disabilities have life-long development needs and have difficulty with certain cognitive skills, although this varies greatly among different individuals. Societal barriers continue to hinder the full and effective participation of people with learning disabilities on an equal basis with others.
Lipreading	A way of understanding or supporting understanding of speech by visually interpreting the lip and facial movements of the speaker. Lipreading is used by some people who are d/Deaf or have some hearing loss and by some deafblind people.
PALS	Patient Advice & Liaison Service – Department within NHS and commissioned organisations responsible for providing advice and guidance to individuals in relation to support/health/social care services.
Protected Characteristics	The Equality Act 2010 introduced the term "protected characteristics" to refer to groups that are protected under the Act. There are 9 in total, age, disability, gender reassignment, marriage & civil partnership, pregnancy & maternity, race, religion or belief, gender/sex, sexual orientation.
Sensory Loss	An impairment that affects the senses, e.g. deafness, blindness.
Speech-to-text-reporter (STTR)	A STTR types a verbatim (word for word) account of what is being said and the information appears on screen in real time for users to read. A transcript may be available and typed text can also be presented in alternative formats. This is a type of communication support which may be needed by a person who is

	d/Deaf and able to read English.
Translator	A person able to translate the written word into a different signed, spoken or written language. For example a sign language translator is able to translate written documents into sign language.
TRAQS	Telford Referral & Quality Service – Local referral assessment service.