



Review Sheet



Last Reviewed
22 Jun '22



Last Amended
22 Jun '22



Next Planned Review in 12 months, or
sooner as required.

Business impact



Changes are important, but urgent implementation is not required, incorporate into your existing workflow.

Reason for this review

Scheduled review

Were changes made?

Yes

Summary:

This policy has been reviewed with minor amendments. The policy remains appropriate and supports staff to understand and implement the principles of the NHS Accessible Information Standards. Underpinning Knowledge and Further Reading links have been reviewed and updated where applicable, alongside a resource "Accessible Information Flag" that can be used to meet this requirement.

Relevant legislation:

- Public Sector Bodies (Websites and Mobile Applications) (No. 2) Accessibility Regulations 2018
- The Care Act 2014
- Equality Act 2010
- The Health and Social Care Act 2008 (Regulated Activities) Regulations 2014
- Mental Capacity Act 2005
- Access to Health Records Act 1990
- Data Protection Act 2018
- UK GDPR

Underpinning knowledge - What have we used to ensure that the policy is current:

- Author: Information Commissioners Office, (2021), *Information Commissioner's Office - UK GDPR*. [Online] Available from: <https://ico.org.uk/> [Accessed: 22/6/2022]
- Author: GOV.UK, (2021), *Understanding Accessibility Requirements for Public Sector Bodies*. [Online] Available from: <https://www.gov.uk/guidance/accessibility-requirements-for-public-sector-websites-and-apps> [Accessed: 22/6/2022]
- Author: NHS England, (2017), *Accessible Information: Implementation guidance v1.1*. [Online] Available from: <https://www.england.nhs.uk/wp-content/uploads/2017/08/implementation-guidance.pdf> [Accessed: 22/6/2022]
- Author: NHS England, (2017), *Accessible Information Standard*. [Online] Available from: <https://www.england.nhs.uk/ourwork/accessibleinfo/> [Accessed: 22/6/2022]
- Author: CQC, (2018), *Meeting the Accessible Information Standard*. [Online] Available from: <https://www.cqc.org.uk/guidance-providers/meeting-accessible-information-standard> [Accessed: 22/6/2022]

Suggested action:

- Encourage sharing the policy through the use of the QCS App
- Share 'Key Facts' with all staff
- Ensure relevant staff are aware of the content of the whole policy

Equality Impact Assessment:

QCS have undertaken an equality analysis during the review of this policy. This statement is a written record that demonstrates that we have shown due regard to the need to eliminate unlawful discrimination, advance equality of opportunity and foster good relations with respect to the characteristics protected by equality law.



1. Purpose

1.1 To make sure that Service Users (and those important to them) who have a disability, impairment, or sensory loss get information that they can access and understand, and get any communication support they need from Victoria Community Care Limited.

1.2 To support Victoria Community Care Limited in meeting the following Key Lines of Enquiry:

Key Question	Key Lines of Enquiry
CARING	C2: How does the service support people to express their views and be actively involved in making decisions about their care, support and treatment as far as possible?
EFFECTIVE	E4: How well do staff, teams and services within and across organisations work together to deliver effective care, support and treatment?
RESPONSIVE	R1: How do people receive personalised care that is responsive to their needs?
SAFE	S1: How do systems, processes and practices keep people safe and safeguarded from abuse?
WELL-LED	W4: How does the service continuously learn, improve, innovate and ensure sustainability?

1.3 To meet the legal requirements of the regulated activities that {Victoria Community Care Limited} is registered to provide:

- | Public Sector Bodies (Websites and Mobile Applications) (No. 2) Accessibility Regulations 2018
- | The Care Act 2014
- | Equality Act 2010
- | The Health and Social Care Act 2008 (Regulated Activities) Regulations 2014
- | Mental Capacity Act 2005
- | Access to Health Records Act 1990
- | Data Protection Act 2018
- | UK GDPR



2. Scope

2.1 The following roles may be affected by this policy:

- | All staff

2.2 The following Service Users may be affected by this policy:

- | Service Users
- | Family
- | Carers
- | Visitors

2.3 The following stakeholders may be affected by this policy:

- | Family
- | Advocates
- | Representatives
- | External health professionals
- | NHS



3. Objectives

3.1 To ensure that Victoria Community Care Limited complies with the NHS Accessible Information Standards and that staff at Victoria Community Care Limited consider how they will apply the standards in a clear, consistent, transparent and fair way.

3.2 For Victoria Community Care Limited to have a clear, consistent, transparent and fair approach to the provision of accessible, inclusive information and communication support to all.



4. Policy

4.1 All staff at Victoria Community Care Limited have a responsibility to make information accessible and inclusive.

4.2 Victoria Community Care Limited will comply fully with the NHS England Accessible Information Standards and will perform the following 5 steps:

- | Ask people if they have any information or communication needs, and find out how to meet their needs
- | Record those needs in a set way
- | Highlight the Service User's file, so it is clear that they have information or communication needs, and clearly explain how these will be met
- | Share information about the person's needs with other NHS and adult social care providers, when there is consent or permission to do so
- | Act to make sure that people get information in an accessible way, and receive communication support if they need it

4.3 Staff will have a working knowledge of the NHS England Accessible Information Standard, and Victoria Community Care Limited will be able to demonstrate compliance through audit and quality assurance processes.

4.4 In line with UK GDPR, Data Protection legislation, Victoria Community Care Limited will enable Service Users to access their records when requested, and this includes the right to review and amend their documented communication preferences.

4.5 Where Service Users are unable to provide consent in relation to their wishes with sharing of information, all decisions regarding this area will be made in line with the Mental Capacity Act 2005 and best interests requirements.

4.6 Victoria Community Care Limited will also comply with the [Accessibility Regulations](#) that came into force for public sector bodies in 2018 and require reasonable adjustments to be made to website and mobile apps for those with disabilities to ensure that they remain accessible.

The regulations require a service's website to comply with [WCAG2.1 AA](#) by:

- | Ensuring that the website is 'perceivable, operable, understandable and robust'
- | Having an accessibility statement available on the website

Although some services may be exempt from the regulations (full government guidance can be referred to [here](#)), Victoria Community Care Limited recognises it has an obligation to ensure that reasonable adjustments are in place for disabled people.



5. Procedure

5.1 Steps to Accessible Standards

There are five basic steps which make up the Accessible Information Standard:

- 1. Ask:** Identify/find out if a Service User has any communication or information needs relating to a disability or sensory loss, and if so what they are.
- 2. Record:** Record those needs in a clear, unambiguous and standardised way in electronic and/or paper-based records/administrative systems or documents.
- 3. Alert/Flag/Highlight:** Ensure that the recorded needs are highly visible whenever the Service User record is accessed, and prompt for action.
- 4. Share:** Include information about the Service User's information/communication needs as part of existing data sharing processes (and in line with existing information governance frameworks).
- 5. Act:** Take steps to ensure that Service Users receive information which they can access and understand, and receive communication support if they need it.

5.2 Step 1 - Ask

At the earliest opportunity, e.g. when an enquiry for a care service is raised, receiving staff must establish any communication needs or wishes in a timely manner.

Pre-Assessment

Before commencing any Care, an assessment will be completed that identifies the communication needs and wishes of the Service User. This information gathering will include identifying how the Service User manages this and what support they will need from staff in order to enable effective communication. Mrs Bernadette Thomas must determine before commencing Care that Victoria Community Care Limited can meet the communication needs of the Service User. Staff must avoid making any assumptions about Service Users' communication needs, and will take care to record their communication needs specifically and separately from any recording of disability or other protected characteristic status.

5.3 Ongoing Assessment

As part of the Care Plan cycle, assessments will be reviewed in accordance with locally agreed timescales or as a Service User's condition changes. As part of this, staff will revisit and identify any new communication needs and support accordingly.

Mrs Bernadette Thomas will consider how to promote enabling all individuals accessing Victoria Community Care Limited to express their communication needs and wishes. There are a range of resources (e.g. posters and leaflets) that can be accessed via NHS England that can help to raise awareness that Victoria Community Care Limited will accommodate different communication preferences (refer to the further reading section of this policy and procedure).

5.4 Step 2 - Record

Recording of communication needs and preferences will be highly visible and clear on paper formats (i.e. jargon-free, and in a simple language). Where electronic systems are used, coding will be in accordance with the defined terminology at Victoria Community Care Limited and assurance will be gained that persons receiving this shared information understand it.

5.5 Step 3 - Alert/Flag/Highlight

Victoria Community Care Limited staff must have systems in place to ensure that records (electronic or paper-based) clearly flag that the Service User has a recorded communication need. They will be highly visible and prompt staff to take action.

Where facilities are in place for automatically generated correspondence, alerts will pick up the requirement for alternative formats. Staff responsible for overseeing standard print letter releases to Service Users must have systems in place to not send these where it would be inappropriate or inaccessible for that person. Victoria Community Care Limited will investigate and learn from any incidents of this nature.

5.6 Step 4 - Share

Consent will be gained from the Service User who has identified specific communication preferences and needs in relation to sharing this information. Any limitations to this must also be documented and clarity provided as to what information can be shared, with whom, in what circumstances, and for what purposes. Where consent cannot be obtained due to reduced capacity, staff must refer to the Mental Capacity Act (MCA) 2005 Policy and Procedure of Victoria Community Care Limited, as well as best interest decisions made in line with the code of practice. Existing internal and external communication systems such as the referral, transfer of care and handover processes will include reference to communication support required for Service Users.



Victoria Community Care Limited

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5.7 Step 5 - Act

Staff must be aware of how to adapt their own communication styles to meet the needs of a Service User, and they must also be competent with the use of any techniques or aids used by Service Users. It is acknowledged that it may take time to establish communication needs from Service Users that choose to not disclose this information, and they will be encouraged to discuss their needs with staff.

Service Users who use limited or no English, and those who use British Sign Language (BSL) or the deafblind manual alphabet must have access to a professional interpreter. Staff will support Service Users to access this and will work with any advice and support offered by the interpreter. Where staff are required to support Service Users to source an interpreter or communication professional, this must be based on the following considerations:

- | Qualifications
- | DBS clearance
- | Professional code of conduct
- | Experience
- | Preference of the Service User (e.g. in relation to gender)
- | Specialist skills needed

Any concerns in relation to the suitability or practice of the interpreter will be discussed with Mrs Bernadette Thomas.

5.8 Environment

Although the Accessible Information Standard does not include environmental matters, some aspects apply to Service Users with a disability, impairment, or sensory loss, in order to facilitate communication. Staff must always consider whether some rooms are 'better' than others for people with communication needs (e.g. less clutter, improved lighting, soundproof), and where Victoria Community Care Limited has control over the premises, this must be considered.

Staff will also consider lighting, in particular where lip reading is vital for the Service User. Mrs Bernadette Thomas will accommodate communication aids that support individuals with communication, such as loop systems, in agreement and review with Victoria Community Care Ltd.

5.9 Conversion of Format

Mrs Bernadette Thomas will consider in advance how to facilitate conversion of key documents, policies and procedures in a timely manner. Mrs Bernadette Thomas will identify which communication formats can be used or produced within Victoria Community Care Limited. For example, email and text message (for people who are deaf as an alternative to telephone, and for people who are blind as an alternative to printed information), and large print.

A local suite of support services and points of contact will be made available in readiness for accessing specific communication requirements that cannot be met within Victoria Community Care Limited. Mrs Bernadette Thomas needs to consider how needs can be met by use of remote, virtual, digital and telecommunications solutions, as well as paper format.

Staff must refer to the Service Users with Communication Difficulties Policy and Procedure for practical support and procedures that can extend to any person accessing Victoria Community Care Limited. Time will be factored into accommodating communication needs, as some Service Users may need longer periods of time to process information than others.

5.10 Training and Education

New staff joining Victoria Community Care Limited will receive an induction that includes communication. For new Care Workers, they will also be required to complete the Care Certificate, which includes standards around communication.

Ongoing staff will be encouraged to develop their learning further. This will be identified through supervisions and appraisals, and by training needs analysis at Victoria Community Care Limited.

5.11 Audit and Review

Mrs Bernadette Thomas will ensure processes are in place to ensure information recorded is current and accurate.

Record keeping audit processes will include a review of the communication preferences of Service Users. Overarching quality assurance checks of Victoria Community Care Limited will identify meeting the needs of any Service User accessing Victoria Community Care Limited. Any discrepancy findings will be immediately acted upon and reflected upon to ensure the risk of reoccurrence is reduced.

Service Users will be supported to provide feedback about their experiences, with information received by



Victoria Community Care Limited in the most appropriate forum. Information received will be acted upon as part of the continuous improvement cycle.



6. Definitions

6.1 Accessible Information

- | Information which is able to be read or received, and understood by the individual or group for which it is intended

6.2 Alternative Format

- | Information provided in an alternative to standard printed or handwritten English, e.g. audio, braille or large print

6.3 Deafblind

- | Deafblindness is a combined hearing and sight loss that causes problems with mobility, communication and access to information



Key Facts - Professionals

Professionals providing this service should be aware of the following:

- | Effective information and communication are vital components of a person-centered approach to care and support
- | Accessible information standards were introduced to standardise how organisations consistently meet communication needs of individuals
- | There are 5 steps to the Accessible Information Standard. These are identify, record, flag, share and act
- | The standards dovetail alongside equality and diversity and data protection legislation
- | The standards are mandatory for NHS and social care providers



Key Facts - People affected by the service

People affected by this service should be aware of the following:

- | Victoria Community Care Limited recognises that you may have specific communication requirements and will ensure that this is accommodated
- | Victoria Community Care Limited will ensure that information is presented in an accessible way, and where appropriate, in a range of languages and formats that are easily used and understood
- | Victoria Community Care Limited will seek your feedback on information sharing as a means of improving its service



Further Reading

As well as the information in the 'underpinning knowledge' section of the review sheet we recommend that you add to your understanding in this policy area by considering the following materials:

Skills for Care - Communication Skills in Social Care:

<https://www.skillsforcare.org.uk/Documents/Learning-and-development/Core-skills/Communication-skills-in-social-care.pdf>

National Register of Communication Professionals working with Deaf and Deafblind people:

<https://www.nrcpd.org.uk>

National Register of Public Service Interpreters:

<https://www.nrpsi.org.uk/>

The Royal National Institute of Blind people and Sense can offer further information about braille and communication formats:

RNIB - Braille and Moon: Tactile Codes:

<https://www.rnib.org.uk/practical-help/reading/braille-and-moon-tactile-codes>

Sense - Total Communication:

<https://www.sense.org.uk/get-support/information-and-advice/communication/total-communication/>

Action on hearing loss and Signhealth can provide resources for hearing loss:

RNID - Hearing Loss:

<https://rnid.org.uk/information-and-support/hearing-loss/>

Signhealth - Who uses British Sign Language (BSL)?

<https://www.signhealth.org.uk/about-deafness/sign-language/>

When producing different communication formats, GOV.UK has produced guidance to support providers:

<https://www.gov.uk/government/publications/inclusive-communication/accessible-communication-formats>

The Stroke Association has produced an animated guide to communicating with people with aphasia, as well as a guidance sheet:

The Stroke Association - Aphasia Etiquette:

<https://www.youtube.com/watch?v=hTh86NoQh7Q>

The Stroke Association - Helping Someone with Communication Problems:

<https://www.stroke.org.uk/resources/helping-someone-communication-problems>

Please refer to the QCS Resource Centre for useful Easy Read support, which includes:

- | How to Create Easy Read Documents
- | QCS Easy Read Template



Outstanding Practice

To be 'outstanding' in this policy area you could provide evidence that:

- | The wide understanding of the policy is enabled by proactive use of the QCS App
- | Different formats of key policies such as the Complaints, Suggestions and Compliments Policy and Procedure are readily available for access
- | Staff receive additional training in relation to communication skills, such as lipreading, sign language, use of electronic communication aids, etc.
- | Records clearly state communication needs and audits demonstrate adherence to the standards
- | Any feedback and suggestions received in relation to communication within Victoria Community Care Limited is acted on in a timely manner as part of quality assurance processes
- | Victoria Community Care Limited actively advertises to any visitors that it can accommodate different communication needs and actively supports a culture that encourages people to disclose their needs



Forms

The following forms are included as part of this policy:

Title of form	When would the form be used?	Created by
Accessible Information Flag	An optional form to be used in Care and Support Planning	QCS



Name: .

My Accessible Information Flag

Communicating effectively

Insert Photo

Explain here how I communicate, My First Language, Verbally, Signs, Symbols and Pictures etc



Communication aids

Such as Pics of Pecs, Widget, Signs and Symbols

These are located here:



Support to Communicate effectively

An Advocate, Interpreter, Makaton, BSL, My Communication Passport

You will find these here:



Giving Information

Signs and Symbols, Audio Versions, Easy Read, Large Print, Braille etc



Communication Support Plan

Give a brief outline here of what is stated in the plan

You can locate this here:



Access and Sharing Information

List here who can share and access information about me. Where to find my consent to share information forms.

You can locate my consent here:



Completed By: .

Date: .