

## Linked Documents

Data Protection Policy  
Confidentiality and Disclosure of Information Policy

# Accessible Communications Policy

## Purpose

The NHS England Accessible Information Standard (AIS) was introduced in July 2016 and applies to all providers of NHS and publicly-funded adult social care. The AIS directs and defines a specific, consistent approach to meeting a person's information and communication needs that relate to a disability, impairment or sensory loss and are therefore protected by the Equality Act 2010.

The AIS is particularly relevant to people who have hearing loss, sight loss, are d/Deaf or deafblind and have additional needs such as a learning disability, mental health.

Action on Hearing Loss supports the aims of the AIS and has been heavily involved in the development and the post-implementation review of the Standard as a member of NHS England's Accessible Information Advisory Group.

Research shows that people who are deaf or have hearing loss often face unnecessary and costly communication issues when they try to access health and social care. The AIS aims to change this and make sure people who are d/Deaf or have hearing loss get the right support to communicate, when they need it.

This policy will enable Action on Hearing Loss' Local Engagement England and Care and Support services in England meet the legal requirements of the AIS.

This policy will ensure that systems and processes are in place for Action on Hearing Loss services to identify, record, flag, share and meet the information and communication support needs of people we support, their families and/or carers where those needs relate to a disability, impairment or sensory loss.

We will ensure that people are able to access our complaints policy in an appropriate format.

## Who is it for and what is in it?

This policy applies to Care and Support, Local Engagement Community Services in England only.

This policy describes how we will meet the requirements of the AIS and explains the procedures for each service type.

## Responsibility

- Local Engagement England - All staff providing Community Services will follow the five key procedures in the Local Engagement section of the policy.
- Care and Support - All staff providing residential, nursing, community or day services will follow the five key procedures of the Care and Support section of the policy. Service managers and Heads of Service will be responsible for the quality monitoring of compliance with the Standards involving people supported and their families as appropriate.

## Policy

Action on Hearing Loss is committed to implementing and following the five distinct steps of meeting the Accessible Information Standard (AIS). These are:

1. **Identification of needs:** a consistent approach to the identification of information and communication needs for the people we support, where they relate to a disability, impairment or sensory loss.
2. **Recording of needs:** a consistent and routine recording of information and communication needs as part of our records or systems. The use of different categories of information and communication needs - defined by the AIS when recording information in paper or electronic records (see appendix A).
3. **Flagging of needs:** establishment and use of electronic flags or alerts, or paper-based equivalents, to ensure records of communication and /or information needs are highly visible to 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.
4. **Sharing of needs:** 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.
5. **Meeting of needs:** taking steps to ensure that the individual receives information in an accessible format and any communication support which they need.

## Procedure

All staff will be made aware of the importance of accessible information and communication and follow local processes and procedures to ensure:

- A consistent approach to identification of information/ communication needs when a person first or next contacts the service.
- A consistent and routine recording of information/communication needs as part of a person's records using the different categories of information and communication needs as defined by the AIS terminology guidance.– see appendix A.
- Sharing of a person's information and communication needs between those involved in their care or support including transfer between health or care provision, whilst following the Data Protection Act and Confidentiality and Disclosure of Information Policy.
- Ensure that a person's information and communication needs are recorded in a 'highly visible' manner and staff will take appropriate action so the person's needs are met.
- Steps are taken to ensure that individuals receive information in an alternative, accessible format and any communication support which they need.
- Where an individual is unable to consent or provide information about their communication needs and the sharing of information, the principles of the Mental Capacity Act and best interest will be applied.

## Procedure for Care and Support for the Five Steps

The procedure below relates to the people we support, their families and/or carers.

### 1. Identification of needs

- Each person will be **asked** at first or next contact to **identify** their preferred information and communication needs and if their family member/carer has any information or communication needs. Where the person is unable to identify their needs themselves, we will involve the person's circle of support.
- This information must be obtained directly from the person themselves or their circle of support.
- Each person will be **asked** what support is needed to communicate face-to-face, how best to receive information, how they prefer to be contacted and what type of communication professional they require.

- People will be offered a number of options such as face to face, BSL or paper forms to help identify their communication and information needs. On initial contact, if the person is unable to communicate their needs, they may need support from a communication professional and this must be provided at a future appointment or home visit as part of the referral process.

## 2. Recording of needs

- For new referrals, the Referral Co-ordinator or person taking the initial enquiry will clearly **record** a person's information and communication needs in the referral and assessment documentation. This information will be transferred to the person carrying out the referral assessment, usually the service manager or a delegated staff member.
- For each person supported, the service manager will ensure the person's information and communication needs are clearly **recorded** in the person's care and support plan and on a 'category record form' in line with the different categories of information and communication needs as defined by the AIS.
- Clear information must be **recorded** in the person's support plan, hospital passport and communication support where present. '.
- The person should be made aware of and agree the exact information recorded and the accuracy. Where the person requires additional support or is unable to agree the information recorded, we will involve the person's circle of support to verify accuracy.
- The information recorded must be current and care and support staff are responsible for updating as required. The record must be reviewed at least annually during the person's review of their support to establish if the person's communication and information needs have changed and how best to meet the needs.
- Care and support staff are responsible for accurate recording of the information and any specific instructions. The information must be current and updated as required in a timely manner to minimise risk of a data breach.

## 3. Flagging of needs

- Managers and staff will ensure they are familiar with the person's information and communication needs and any specific instructions e.g. communication passport, before support or information is provided and that all staff members, including casual and agency workers are clear and consistent when communicating.
- Information must be '**highly visible**'
- Under the Standards 'highly visible' means:
  - Obvious and overtly apparent

- Visible on the cover, title and/or front page of a document, file or electronic record.
- Highlighted on a paper record to draw attention to the information as being of particular importance, for example in a larger or bold font and/or a different colour.

#### 4. Sharing of needs

- Care and support staff will **share** a person's information and communication needs with relevant others involved in the person's care and when transferring between internal or external services. Staff will adhere to the Data Protection Policy and the Mental Capacity Act when **sharing** information.
- Wherever possible, consent to share should be obtained from the person and clearly recorded. If consent to share cannot be obtained and the person lacks the capacity to make the decision, then a decision to share information can be made in the person's best interests in line with the Mental Capacity Act 2005.

#### 5. Meeting of needs

- Care and Support staff will **act** on the information provided and will:-
  - Take appropriate action to enable people to communicate effectively, including staff modifying their behaviour and/or with the use of tools or aids.
  - Ensure that individuals receive information in a format they can access and understand e.g. pictures, large print, easy read.
  - Match peoples' communication methods with appropriate staff that can communicate and be understood effectively with the person.
  - Care and support staff will support the person to understand their rights under the AIS when accessing health appointments. The Standard states that 'where needed, appropriate, qualified, professional communication support **MUST** be arranged or provided to enable individuals to effectively access / receive health or adult social care, to facilitate effective / accurate dialogue, and to enable participation in decisions about their health, care or treatment.'
  - Contact people using their preferred method of communication and provide accessible ways for people to contact the service.
  - Inform people of the potential confidentiality risk when sending/receiving information via email or text – refer to **Confidentiality and Disclosure of Information Policy**. Signpost people to accessible information available on our website and other sources including BSL video.

- Allocate time to people supported to meet their communication needs, funding permitting. Where funding is not sufficient for appropriate communication, service managers will support the person to address this with the relevant funding body.
- Staff and volunteers will receive training as part of their induction and job role about sensory loss, Accessible Information Standards awareness and how to support people with communication needs, as well as BSL training where appropriate.
- Compliance with the standards will be monitored through the quality monitoring process and we will review our learning taking remedial action where needed.

## Procedure for Local Engagement for the Five Steps

**This procedure applies to Local Engagement England Community Services**

### **1. Identification of needs**

- Services that specifically address visual, hearing or dual sensory loss needs will assign a sensory support or rehabilitation officer to carry out an assessment for each person referred to the service. The assessment will identify any disability, impairment or sensory loss and will cover how this affects their ability to obtain information and their communication needs.
- People using drop in services for the first time will be asked by staff and volunteers to complete a registration form which identifies the person's communication or information support needs. People already registered will be asked at each visit if they have any communication or information support needs and these will be recorded on an "update my record" sheet.
- People will be offered the option to complete the registration form themselves or staff/volunteers can go through it with them face to face to help identify their communication and information needs. If the person is unable to communicate what their needs are they may need support from a communication professional and this will be provided at a future appointment or home visit.

### **2. Recording of needs**

- Information and communication support needs are recorded on the person's paper and electronic files with communication and information needs highly visible. Information is recorded using the different categories of information and communication needs as defined by the AIS.

- Information recorded about individual's communication and information needs will be provided by the person themselves, or when this is not possible, by their informal carer or family member.

### **3. Flagging of needs**

- Rehabilitation or sensory support officers will access a person's records to review and prepare before an appointment. Information and communication support needs are highly visible and highlighted on the cover and/or first page of the person's file. This will include any instructions for the staff member to action in order to meet the person's needs during the appointment.
- Records will be reviewed with the person regularly for accuracy and to ensure their needs are still being met.
- Where services function as a drop in it is not possible to access a person's records before they attend. Instead people will be asked at each visit if they have any communication support needs and appropriate action will be taken to ensure their communication needs are met.
- In services where tablets are in use a person's details can be accessed and any communication needs will be highly visible.
- If we need to contact the person their preferred method and format of communication will be flagged up on their electronic record to ensure they are contacted in the correct way.

### **4. Sharing of needs**

- Each community service will have an agreed process of sharing and reporting information with the funding/commissioning body which complies with GDPR legislation. We will ensure that information shared includes the person's information and communication needs where appropriate.
- When making a referral the relevant information including the person's information and communication needs will be shared.

### **5. Meeting of needs**

- Community services will have systems in place to meet a person's information and communication needs. These include:
  - Having multiple contact methods for people to access our services such as telephone, textphone, email and by text.

- Contacting people using their preferred communication method such as by letter, telephone, email and text.
- Having information available in easy read and standard large print (and ensuring specific font size and type are available on request), providing colour contrast for vision loss, braille or audio format.
- Signposting people to accessible information available on our website including BSL video
- If a person requests a communication professional the staff member will arrange an appointment or home visit and book the required communication support. Communication professionals booked using our internal system will be NRCPD registered.
- Booking appointments based on the needs of the person, ensuring appointment times are long enough particularly when a communication professional is booked.
- Staff and volunteers are trained as part of their induction and job role about sensory loss and how to support people with communication needs.

### **Leaflets and Factsheets**

Action on Hearing Loss' factsheets and leaflets are available in accessible formats such as large print, audio and braille upon request from our Information Line. Key information relevant to BSL users is translated into BSL video and is available on our website.

### **Website**

Our website is designed to be accessible. Some key information is available in British Sign Language (BSL) video and the formatting and the layout of webpages are also compatible with assistive devices such as screen readers. The website will conform to Priority Level AA of the Web Content Accessibility Guidelines (WCAG 2.0) where applicable.

### **Records**

All records will be kept in line with recording procedures for each service type.  
All records will be kept in line with the Data Protection policy.

### **Training**

This policy will be available to all employees via The Loop. No formal training is required for this policy. Department staff briefings are provided.

### **Performance Measures**

We will request feedback from people we support about the quality and accuracy of the information they receive in appropriate formats and how we meet their communication needs.

We will monitor compliance with the standards through our quality assurance processes and local contract requirements.

### Review Period

This policy will be reviewed jointly by Care and Support and Local Engagement policy teams every 3 years.

### Equality and Diversity

All staff are expected to deliver services in a manner which respects the individuality of each person using the service and treat them, and members of the workforce respectfully, regardless of protected characteristics.

An equality impact assessment has been completed for this policy. Please contact the Care & Support Policy and Practice Team for further information.

### Record of Changes

Revised in line with Accessible Information Standards Change paper August 2017

Definition of highly visible updated for Local Engagement and Care and Support

Consent to share process strengthened

Update to leaflets section to include factsheets

Addition of website accessibility conformity

Policy changed to 3 year review cycle

### References and Further Information

NHS England Accessible Information Standards Specification

<https://www.england.nhs.uk/wp-content/uploads/2015/07/access-info-spec-fin.pdf>

NHS England Accessible Information Standards Implementation Guidance

<https://www.england.nhs.uk/wp-content/uploads/2015/07/access-info-implmntn-guid.pdf>

NHS England Easy Read accessible information standard <https://www.england.nhs.uk/wp-content/uploads/2015/07/access-info-upd-er-july-15.pdf>

[Accessible Information: Implementation Guidance - Change Paper August 2017](#)

[Accessible Information Specification v1.1 August 2017](#)

The Equality Act 2010

The Care Act 2014

The Health and Social Care Act 2012 (England) [www.actiononhearingloss.org.uk](http://www.actiononhearingloss.org.uk) – On the Record Campaign

Mental Capacity Act 2005 (England and Wales)

Mental Capacity Act Northern Ireland 2016

<https://www.actiononhearingloss.org.uk/supporting-you/policy-research-and-influencing/policy/policy-statements/health-and-social-care.aspx>

- Access to Health policy statement