



## Review Sheet




Last Reviewed  
15 Sep '20



Last Amended  
15 Sep '20



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

Business impact	 <p>Minimal action required circulate information amongst relevant parties.</p>
Reason for this review	Scheduled review
Were changes made?	Yes
Summary:	This policy highlights the process to adopt to ensure a service is meeting the accessible information standards and the needs of their service users. It has been reviewed with no significant changes and references checked and updated. The reference number of this policy has changed. Previously it was CR64.
Relevant legislation:	<ul style="list-style-type: none"> <li>• Equality Act 2010</li> <li>• The Health and Social Care Act 2008 (Regulated Activities) Regulations 2014</li> <li>• Mental Capacity Act 2005</li> <li>• Access to Health Records Act 1990</li> <li>• Data Protection Act 2018</li> </ul>
Underpinning knowledge - What have we used to ensure that the policy is current:	<ul style="list-style-type: none"> <li>• Author: NHS England, (2017), <i>Accessible Information Standard</i>. [Online] Available from: <a href="https://www.england.nhs.uk/ourwork/accessibleinfo/">https://www.england.nhs.uk/ourwork/accessibleinfo/</a> [Accessed: 15/9/2020]</li> <li>• Author: NHS England, (2017), <i>Accessible Information: Implementation Guidance v1.1</i>. [Online] Available from: <a href="https://www.england.nhs.uk/wp-content/uploads/2017/08/implementation-guidance.pdf">https://www.england.nhs.uk/wp-content/uploads/2017/08/implementation-guidance.pdf</a> [Accessed: 15/9/2020]</li> <li>• Author: CQC, (2018), <i>Meeting the Accessible Information Standard</i>. [Online] Available from: <a href="https://www.cqc.org.uk/guidance-providers/meeting-accessible-information-standard">https://www.cqc.org.uk/guidance-providers/meeting-accessible-information-standard</a> [Accessed: 15/9/2020]</li> </ul>
Suggested action:	<ul style="list-style-type: none"> <li>• Encourage sharing the policy through the use of the QCS App</li> </ul>
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 any communication support that they need from Inspiring Aspirations Plus Ltd T/A Inspiring Support.

**1.2** To support Inspiring Aspirations Plus Ltd T/A Inspiring Support 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 {Inspiring Aspirations Plus Ltd T/A Inspiring Support} is registered to provide:

- | 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



## 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 Inspiring Aspirations Plus Ltd T/A Inspiring Support complies with the NHS Accessible Information Standards and that staff at Inspiring Aspirations Plus Ltd T/A Inspiring Support consider how they will apply the standards in a clear, consistent, transparent and fair way.



### 4. Policy

**4.1** All staff at Inspiring Aspirations Plus Ltd T/A Inspiring Support have a responsibility to make information accessible and inclusive.

**4.2** Inspiring Aspirations Plus Ltd T/A Inspiring Support 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 a 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 a 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 Inspiring Aspirations Plus Ltd T/A Inspiring Support will be able to demonstrate compliance through audit and quality assurance processes.

**4.4** In line with Data Protection legislation, Inspiring Aspirations Plus Ltd T/A Inspiring Support 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.



## 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.

#### Assessment

Before commencing any Support, 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.

Jo Kerley must determine before commencing care that Inspiring Aspirations Plus Ltd T/A Inspiring Support 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.

Jo Kerley will consider how to promote enabling all individuals accessing Inspiring Aspirations Plus Ltd T/A Inspiring Support 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 Inspiring Aspirations Plus Ltd T/A Inspiring Support 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 Inspiring Aspirations Plus Ltd T/A Inspiring Support and assurance will be gained that persons receiving this shared information understand it.

#### 5.5 Step 3 - Alert/ Flag/ Highlight

Inspiring Aspirations Plus Ltd T/A Inspiring Support 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. Inspiring Aspirations Plus Ltd T/A Inspiring Support 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 Inspiring Aspirations Plus Ltd T/A Inspiring Support, 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.



### 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 deaf-blind 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 User's 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 Jo Kerley.

### 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 Inspiring Aspirations Plus Ltd T/A Inspiring Support 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. Jo Kerley will accommodate communication aids that support individuals with communication, such as loop systems, in agreement and review with Inspiring Aspirations Plus T/A Inspiring Support.

### 5.9 Conversion of Format

Jo Kerley will consider in advance how to facilitate conversion of key documents, policies and procedures in a timely manner. Jo Kerley will identify which communication formats can be used or produced within Inspiring Aspirations Plus Ltd T/A Inspiring Support. 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 Inspiring Aspirations Plus Ltd T/A Inspiring Support. Jo Kerley 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 Inspiring Aspirations Plus Ltd T/A Inspiring Support. 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 Inspiring Aspirations Plus Ltd T/A Inspiring Support will receive an induction that includes communication. For new Support 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 Inspiring Aspirations Plus Ltd T/A Inspiring Support.

### 5.11 Audit and Review

Jo Kerley 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 Inspiring Aspirations Plus Ltd T/A Inspiring Support will identify meeting the needs of any Service User accessing Inspiring Aspirations Plus Ltd T/A Inspiring Support. 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



Inspiring Aspirations Plus Ltd T/A Inspiring Support 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:

- | Inspiring Aspirations Plus Ltd T/A Inspiring Support recognises that you may have specific communication requirements and will ensure this is accommodated
- | Inspiring Aspirations Plus Ltd T/A Inspiring Support will ensure information is presented in an accessible way, and where appropriate, in a range of languages and formats that are easily used and understood
- | Inspiring Aspirations Plus Ltd T/A Inspiring Support will seek your feedback on information sharing as a means of improving its service



## Further Reading

There is no further reading for this policy, but we recommend the 'underpinning knowledge' section of the review sheet to increase your knowledge and understanding.



## 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
- | Inspiring Aspirations Plus Ltd T/A Inspiring Support actively advertises to any visitors that it can accommodate different communication needs and actively supports a culture that encourages people to disclose their needs
- | 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 Inspiring Aspirations Plus Ltd T/A Inspiring Support is acted on in a timely manner as part of quality assurance processes



## Forms

Currently there is no form attached to this policy.