



 **Review Sheet**



Last Reviewed
07 Mar '24



Last Amended
07 Mar '24



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

<p>Business impact</p>	 <p>Minimal action required circulate information amongst relevant parties.</p>
<p>Reason for this review</p>	<p>Scheduled review</p>
<p>Were changes made?</p>	<p>Yes</p>
<p>Summary:</p>	<p>This policy has been reviewed and remains appropriate. It supports staff to understand and implement the principles of The NHS Accessible Information Standard. Underpinning Knowledge and Further Reading Links have been reviewed and updated where applicable.</p>
<p>Relevant legislation:</p>	<ul style="list-style-type: none"> 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
<p>Underpinning knowledge - What have we used to ensure that the policy is current:</p>	<ul style="list-style-type: none"> Author: Information Commissioner's Office, (2024), <i>UK GDPR guidance and resources</i>. [Online] Available from: https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/ [Accessed: 7/3/2024] Author: GOV.UK, (2023), <i>Understanding accessibility requirements for public sector bodies</i>. [Online] Available from: https://www.gov.uk/guidance/accessibility-requirements-for-public-sector-websites-and-apps [Accessed: 7/3/2024] Author: CQC, (2022), <i>Meeting the Accessible Information Standard</i>. [Online] Available from: https://www.cqc.org.uk/guidance-providers/meeting-accessible-information-standard [Accessed: 7/3/2024] Author: NHS England, (2017), <i>Accessible Information Standard Implementation Guidance</i>. [Online] Available from: https://www.england.nhs.uk/publication/accessible-information-standard-implementation-guidance/ [Accessed: 7/3/2024] Author: GOV UK, (2018), <i>The Public Sector Bodies (Websites and Mobile Applications) Accessibility Regulations 2018</i>. [Online] Available from: https://www.legislation.gov.uk/uksi/2018/852/contents/made [Accessed: 7/3/2024] Author: NHS England, (2017), <i>Accessible Information Standard</i>. [Online] Available from: https://www.england.nhs.uk/ourwork/accessibleinfo/ [Accessed: 7/3/2024]
<p>Suggested action:</p>	<ul style="list-style-type: none"> Encourage sharing the policy through the use of the QCS App
<p>Equality Impact Assessment:</p>	<p>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.</p>



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, understand and receive any communication support that they need from BASELINE HEALTHCARE AND SUPPORT SERVICES LIMITED.

1.2 To support BASELINE HEALTHCARE AND SUPPORT SERVICES LIMITED in meeting the following Key Lines of Enquiry/Quality Statements (New):

Key Question	Key Lines of Enquiry	Quality Statements (New)
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?	QSC2: Treating people as individuals
EFFECTIVE	E4: How well do staff, teams and services within and across organisations work together to deliver effective care, support and treatment?	QSE3: How staff, teams & services work together
RESPONSIVE	R1: How do people receive personalised care that is responsive to their needs?	QSR1: Person-centred care
SAFE	S1: How do systems, processes and practices keep people safe and safeguarded from abuse?	QSS3: Safeguarding
WELL-LED	W4: How does the service continuously learn, improve, innovate and ensure sustainability?	QSW7: Learning, improvement and innovation
RESPONSIVE	No equivalent KLOE	QSR3: Providing information
SAFE	No equivalent KLOE	QSS2: Safe systems, pathways and transitions

1.3 To meet the legal requirements of the regulated activities that BASELINE HEALTHCARE AND SUPPORT SERVICES 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
- Visitors

2.3 The following stakeholders may be affected by this policy:

- Family
- Advocates
- Representatives
- Commissioners
- External health professionals
- Local Authority
- NHS



3. Objectives

3.1 To ensure that BASELINE HEALTHCARE AND SUPPORT SERVICES LIMITED complies with the NHS Accessible Information Standard, and that staff at BASELINE HEALTHCARE AND SUPPORT SERVICES LIMITED consider how they will apply the standard in a clear, consistent, transparent and fair way.

3.2 For BASELINE HEALTHCARE AND SUPPORT SERVICES 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 BASELINE HEALTHCARE AND SUPPORT SERVICES LIMITED have a responsibility to make information accessible and inclusive.

4.2 BASELINE HEALTHCARE AND SUPPORT SERVICES LIMITED will comply fully with the NHS England Accessible Information Standard 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** in 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 BASELINE HEALTHCARE AND SUPPORT SERVICES LIMITED will be able to demonstrate compliance through audit and quality assurance processes.

4.4 In line with UK GDPR, data protection legislation, BASELINE HEALTHCARE AND SUPPORT SERVICES 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 BASELINE HEALTHCARE AND SUPPORT SERVICES 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 websites 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](#)), BASELINE HEALTHCARE AND SUPPORT SERVICES LIMITED recognises it has an obligation to ensure that reasonable adjustments are in place for disabled people.



5. Procedure

5.1 Steps to the Accessible Standard

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's 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. Before commencing Care, Adeola Adesegun must determine that BASELINE HEALTHCARE AND SUPPORT SERVICES LIMITED can meet the communication needs of the Service User. Staff must avoid making any assumptions about Service Users' communication needs, and must take care to record people's 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.

Adeola Adesegun will consider how to promote enabling all individuals accessing BASELINE HEALTHCARE AND SUPPORT SERVICES 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 BASELINE HEALTHCARE AND SUPPORT SERVICES LIMITED will accommodate different communication preferences (refer to the Further Reading section of this policy).

5.4 Step 2 - Record

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

5.5 Step 3 - Alert/ Flag/ Highlight

Staff at BASELINE HEALTHCARE AND SUPPORT SERVICES LIMITED 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. BASELINE HEALTHCARE AND SUPPORT SERVICES 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 should refer to the Mental Capacity Act (MCA) 2005 Policy and Procedure of BASELINE HEALTHCARE AND SUPPORT SERVICES LIMITED and 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 must 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, will have access to a professional interpreter. Staff will support the Service User 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 Adeola Adesegun.

5.8 Environment

Although the Accessible Information Standard does not include environmental or facilities 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. As part of the Care Plan process, the environment must be considered and appropriate locations detailed in the Care Plan where specific rooms might provide better support to facilitate communication.

Staff will consider lighting, in particular where lip reading is vital for the Service User.

Adeola Adesegun will accommodate communication aids that support individuals with communication, such as loop systems, in agreement and review with Adeola Adesegun.

5.9 Conversion of Format

Adeola Adesegun must consider in advance how to facilitate the conversion of key documents, policies and procedures in a timely manner. Adeola Adesegun will identify which communication formats can be used or produced within BASELINE HEALTHCARE AND SUPPORT SERVICES 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.

Staff should also refer to the Recite Me tool within QCS Compliance Centre, which will support with the conversion of policies and resources into different languages, large print and audio amongst other available functions.

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 BASELINE HEALTHCARE AND SUPPORT SERVICES LIMITED. Adeola Adesegun will consider how needs can be met by the use of remote, virtual, digital and telecommunications solutions, as well as paper format.

5.10 Staff can refer to the Supporting Communication and Sensory Needs Policy and Procedure of BASELINE HEALTHCARE AND SUPPORT SERVICES LIMITED for practical support and procedures that can extend to any person accessing BASELINE HEALTHCARE AND SUPPORT SERVICES LIMITED.

Time should be factored into accommodating communication needs, as some Service Users may need longer periods of time to process information than others.

5.11 Training and Education

New staff joining BASELINE HEALTHCARE AND SUPPORT SERVICES 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.

5.12 Audit and Review

Adeola Adesegun will ensure that processes are in place to make sure that 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 BASELINE HEALTHCARE AND SUPPORT SERVICES LIMITED will identify meeting the needs of any Service User accessing BASELINE HEALTHCARE AND SUPPORT SERVICES LIMITED. Any findings of discrepancy 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 BASELINE HEALTHCARE AND SUPPORT SERVICES 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-centred approach to care and support
- The Accessible Information Standard was 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 standard dovetails alongside equality and diversity and data protection legislation
- The standard is 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:

- BASELINE HEALTHCARE AND SUPPORT SERVICES LIMITED recognises that you may have specific communication requirements and will ensure this is accommodated
- BASELINE HEALTHCARE AND SUPPORT SERVICES LIMITED 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
- BASELINE HEALTHCARE AND SUPPORT SERVICES 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 - Care Certificate - Communication:

<https://www.skillsforcare.org.uk/Developing-your-workforce/Care-Certificate/Care-Certificate.aspx>

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: 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/>

GOV.UK - Guidance - Accessible Communication Formats:

<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 - Communication Problems After a Stroke:

<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
- Accessible Information Flag

Please refer to the 'Recite Me' function within QCS Compliance Centre which can be accessed by clicking on the person icon.



Outstanding Practice

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

- Different formats of key policies such as the Complaints, Suggestions and Compliments Policy and Procedure are readily available for access
- BASELINE HEALTHCARE AND SUPPORT SERVICES 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
- 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 standard
- Any feedback and suggestions received in relation to communication within BASELINE HEALTHCARE AND SUPPORT SERVICES LIMITED is acted on in a timely manner as part of quality assurance processes
- The wide understanding of the policy is enabled by proactive use of the QCS App



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 - CR63	An optional form to be used in Care and Support Planning	QCS

BASELINE HEALTHCARE AND SUPPORT SERVICES LIMITED
45-47 Longsmith Street GL1 2HT

	<p>Service User: .</p>
<p align="center">My Accessible Information Flag</p>	
<p>Insert Photo</p>	<p align="center">Communicating effectively</p> <p>Explain here how I communicate, My First Language, Verbally, Signs, Symbols and Pictures etc</p>
	<p align="center">Communication aids</p> <p>Such as Pics of Pecs, Widget, Signs and Symbols</p> <p>These are located here:</p>
	<p align="center">Support to Communicate effectively</p> <p>An Advocate, Interpreter, Makaton, BSL, My Communication Passport</p> <p>You will find these here:</p>
	<p align="center">Giving Information</p> <p>Signs and Symbols, Audio Versions, Easy Read, Large Print, Braille etc</p>
	<p align="center">Communication Support Plan</p> <p>Give a brief outline here of what is stated in the plan</p> <p>You can locate this here:</p>
	<p align="center">Access and Sharing Information</p> <p>List here who can share and access information about me. Where to find my consent to share information forms.</p> <p>You can locate my consent here:</p>
	<p>Completed By: . Date: .</p>