Accessible Information Standard Policy

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1 Introduction

1.1 Policy statement

The Accessible Information Standard (AIS) came into effect on the 1 August 2016. All organisations that provide NHS care and/or publicly funded adult social care are legally required to follow the AIS.

The AIS sets out a specific, consistent approach to identifying, recording, flagging, sharing and meeting the information and communication support needs of patients, service users, carers and parents with a disability, impairment or sensory loss. Specifically, the General Medical Council's <u>Good Medical Practice 2013</u> states 'you should make sure that arrangements are made, wherever possible, to meet patients' language and communication needs'.

Consideration has been given to the impact this policy might have with regard to the individual protected characteristics of those to whom it applies.

This policy should be read in conjunction with <u>CQC GP Mythbuster 20 – Making information accessible</u> and their document titled <u>Meeting the Accessible Information Standard</u>.

1.2 Status

This document and any procedures contained within it are non-contractual and may be modified or withdrawn at any time. For the avoidance of doubt, it does not form part of your contract of employment although it applies to all employees of the organisation and other individuals performing functions in relation to the organisation such as agency workers. locums and contractors.

The organisation aims to design and implement policies and procedures that meet the diverse needs of our service and workforce, ensuring that none are placed at a disadvantage over others, in accordance with the <u>Equality Act 2010</u>.

2 The Accessible Information Standard

2.1 Background

All organisations providing NHS or adult social care have a legal duty (produced under section 250 of the Health and Social Care Act 2012 and supported by the Equality Act 2010 obligations) to make 'reasonable adjustments' to improve access for disabled people. The Accessible Information Standard aims to clarify what is 'reasonable' in making sure people who have a disability, impairment or sensory loss receive information they can easily read or understand and get any communication support they need.

Since 2016, providers of any NHS funded care must, by law and the AIS covers patients, their parents and carers.

2.2 Aim

The aim of the AIS is to establish a framework and set a clear direction such that patients and service users (and where appropriate carers and parents) who have information or communication needs relating to a disability, impairment or sensory loss receive:

- Accessible information ("information which is able to be read or received and understood by the individual or group for which it is intended")
- Communication support ("support which is needed to enable effective, accurate dialogue between a professional and a service user to take place")

This includes accessible information and communication support to enable individuals to:

- Make decisions about their health and wellbeing and about their care and treatment
- Self-manage conditions
- · Access services appropriately and independently
- Make choices about treatments and procedures including the provision or withholding of consent

2.3 Application of the AIS

All providers of NHS care are required to meet the AIS. The Standard applies to all services users who have information or communication needs as a result of disability, impairment or sensory loss. This includes patients who are:

- Deaf
- Blind
- Deafblind
- Suffering from learning disabilities

The Standard can also be used to support people with:

- Autism
- Mental health conditions
- Aphasia

The AIS should involve parents and carers.

2.4 Five steps of the AIS

The <u>five steps</u> of the AIS and how to comply with this guidance:

1. Ask people if they have any information or communication needs and find out how to meet their needs.

Holborn Medical Centre will ensure that the practice website contains clear signposting and appropriate downloadable documentation or that this is available on request for patients who have communication needs.

2. Record those needs clearly and in a set way.

Holborn Medical Centre will ensure that the necessary clinical coding of communication needs is added to the clinical records of patients upon registration. They will also ensure that the appropriate on-screen alert is operating and that it includes information regarding the preferred communication channel or what level of communication support is needed.

3. Highlight or flag the person's file or notes so it is clear that they have information or communication needs and how to meet those needs.

Holborn Medical Centre will make use of alerts on Emis clinical system, thereby indicating that an individual has an information or communication need

4. Share information about people's information and communication needs with other providers of NHS and adult social care when they have consent or permission to do so.

Holborn Medical Centre will ensure that data about patient information or communication needs is shared appropriately. Consent must be obtained and is to be clearly identifiable and separate from other comments entered into the healthcare record.

5. Take steps to ensure that people receive information which they can access and understand and receive communication support if they need it.

Holborn Medical Centre will take the necessary steps to ensure that patients with communication or information needs receive information in a format which is accessible to them and in a manner in which they understand. This may include, for example, the provision of a portable induction hearing loop or a foreign language interpreter either in person or through a remote service such as Language Line.

2.5 Information in different languages

<u>CQC GP Mythbuster No 20</u> advises that there is no need for this organisation to have information leaflets in multiple languages. However, the key point is that Holborn Medical Centre must be responsive to the needs of the population that we serve and commensurate with the demographics of our list.

At Holborn Medical Centre, the following languages are representative and therefore leaflets and information will also be made available for these groups on request:

Polish, Slovakian, Bangladeshi, Chinese, Indian and Pakistani (data taken from our ethnicity coding).

Furthermore, the NHS E document details the <u>principles framework for high quality interpreting and translating services</u> in primary care. This covers both community language and British Sign Language (BSL) interpreting.

2.6 How to meet the AIS

1. Identification

Holborn Medical Centre will ensure that the practice website contains clear signposting and appropriate downloadable documentation, or that this is available on request, for patients who have communication needs. This information will be replicated in the practice waiting room and on practice social media platforms.

All staff will make appropriate arrangements for individuals to discuss their communication needs privately, should they wish to do so, whilst ensuring that sufficient information is ascertained and recorded accurately. This is not a retrospective requirement and could easily be embedded into the registration process for new patients as per <u>Section 2.7</u>.

2. Recording and flagging

Holborn Medical Centre will ensure that the necessary clinical coding of communication needs is added to the clinical records of patients upon registration. They will also ensure that the appropriate on-screen alert is operating and that it includes information regarding the preferred communication channel or what level of communication support is needed.

In relation to online access, staff will adhere to the <u>Access to Medical Records Policy.</u>

3. Sharing

Clinical members of staff are responsible for ensuring that, when a patient is referred to any other NHS or social care organisation, they are asked (at the time of consultation) for permission to share their communication needs with the other organisation.

All staff are to ensure they are aware of the applicable practice privacy notice for their region of England, Scotland, Wales or Northern Ireland and should, if necessary, refer patients to this notice.

Consent must be obtained and is to be clearly identifiable and separate from other comments entered into the healthcare record. For further information, refer to the practice <u>UK General Data Protection Regulation (UK GDPR) Policy</u> and the practice Consent Guidance.

4. Meeting patient needs

Holborn Medical Centre will ensure that all correspondence affords patients the opportunity to have their individual information or communication needs met by including the following on said correspondence:

"If you would like this letter or information in an alternative format (for example, large print or easy read) or if you need help with communicating with us (for example, because you use British Sign Language), please let us know. You can call us on 020 3077 0044 or email emailedmin.hmc@nhs.net.

The organisation will ensure that a 'hearing loop' is available throughout the premises or that a portable loop is available. The organisation will also ensure that the current contact details for access to properly qualified persons who are

registered interpreters for deafblind persons or who use sign language and other assisted communication methods are available in reception.

The organisation will ensure that only persons who are registered interpreters, properly qualified, insured and DBS checked to Enhanced Disclosure level are used.

2.7 Registration

Holborn Medical Centre will ensure that as much information about patients' specific needs is captured during the registration process. Patients will be asked to complete the new patient registration form which is available as an annex to the New Patient Registration and Health Check Policy.

2.8 Requirements and further reading

The UK nations' requirements are as follows:

- England
- Scotland
- Wales
- Northern Ireland

Additionally, background information into the AIS can be found in the Gov.uk document titled Accessible communication formats.

Scottish practices can refer to the Accessible Information Standards Policy (Scotland).

3 Summary

Holborn Medical Centre has a duty to ensure that the AIS is adhered to and must also demonstrate to ICB, CQC and patients how it is meeting the AIS. Effectively implementing the Standard will lead to improved patient experience and outcomes whilst ensuring that patients receive safe, high quality care at all times.

<u>Annex A</u> gives examples of the tools and assistance available as well as further reading and links to training for organisation use.

Annex A – Useful information and links

Listed are useful links to NHS England guidance on implementing the Accessible Information Standard (AIS).

This <u>link</u> provides the full list of factsheets and clarifying information. It also provides a further link to the comprehensive NHS E implementation guidance to support AIS. At

Holborn Medical Centre, we are aware that it is our responsibility to implement and to fully adhere to the AIS.

Within this NHS E link, there are numerous factsheets that can support implementation of AIS and the full implementation guidance to support AIS can be found here.

Further information:

- 1. Disabled people's experiences and advice for healthcare professionals:
 - This <u>video</u> shows members of Manchester People First talking about what helps them to attend health appointments
 - A film about enabling communication with local Deaf people for front-line medical staff can be found here

In this YouTube clip, Deaf people talk about the importance of front-line staff having some basic sign language skills. The School of Sign Language provides free introductory resources into understanding British Sign Language (BSL).

- 2. Alternative format and communication support providers:
 - AbilityNet

Support to ensure websites, apps and other digital services are accessible and compliant with access legislation. AbilityNet also provides guidance to disabled IT users to optimise accessibility to computers and smart phones (My Computer, My Way).

CHANGE People

A human rights organisation led by disabled people. They create bespoke accessible information in easy read and video formats for organisations and much of the content has a health focus.

Relav UK

Relay UK supports d/Deaf people and people with speech impairments to communicate with anyone over the phone using an app based national relay service.

Hearing Link

Hearing Link has some advice and best practice tips for hearing loops for service users.

Inclusive language

Gov.uk (Office for Disability Issues) provides guidance on words to use and avoid when discussing disability.

Live Transcribe & Sound Notifications App

This is an app that makes everyday conversations and surrounding sounds more accessible among people who are deaf and hard of hearing, using just a phone.

<u>National Registers of Communication Professionals working with Deaf and Deafblind People (NRCPD)</u>

NRCPD exists to protect the public by regulating communication and language professionals who work with deaf and deafblind people.

They hold a searchable register of interpreters for d/Deaf and deafblind people and also lipspeakers, notetakers, sign language interpreters, sign language translators and speech to text reporters.

• RNIB Business - Transcription Services

RNIB's transcription team takes original copy and transforms it into accessible formats including braille, large and giant print and audio.

Breakthrough UK

Breakthrough UK is a Manchester based disabled people's organisation led by disabled people who support other disabled people to work and live independently.

Breakthrough is able to provide training for staff.