



Business Services
Organisation

Providing Support to Health and Social Care

Accessible Formats Policy

For the provision of information

February 2020

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Appendix 1: Practical advice on making information accessible

Accessibility statement

Any request for the document in another format or language will be considered.

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1. Introduction

Information produced by our organisation exists in many forms, including letters, leaflets, forms, and reports. It includes information about services, policies, procedures, facilities, legislation, duties and entitlements. This means that both individuals and the public at large may be target groups of our information.

The purpose of this policy is to help our organisation meet the information needs of individuals as effectively as possible by giving particular regard to accessible formats. We want to make sure that our approach to the provision of information either in written or alternative format is accessible, clear, balanced, fair, transparent and accurate. The policy is aimed at managers and staff involved in, or who have any responsibility for, the provision of information.

The policy sets out the standards that can be expected from us when we provide information, ensuring its accessibility for those with particular needs. The associated guidance provides practical advice to staff on how to make information accessible.

The Accessible Formats Policy aims to raise awareness of the importance of developing and providing information that is accessible. This is to meet specific needs of different groups of people including those with a sensory impairment or a learning disability, people from different sexual orientations, older people and younger people, people from minority ethnic groups who are not fluent in English, and more generally people with lower literacy levels.

2. What are accessible formats?

A large number of people find it difficult to read the typical information available from our health and social care organisations, not least when it is lengthy or when jargon and abbreviations are used. **Accessible information** is about using plain language to make information easier to understand for everyone. It is also about using appropriate channels for disseminating information.

Accessible formats relate to the general form, appearance and layout of a document. The term 'accessible format' covers two aspects:

1. a minimum set of formatting standards to be followed for all written information – to make them accessible for as wide an audience as possible and
2. an alternative version of a document, for a specific audience with particular needs, for example
 - large print, Braille (for people with visual impairments)
 - audio visual formats (CD, video including subtitles or signed content, mp3 or DAISY) (for people with sensory impairments)
 - Easy Read (for people with a learning disability)
 - translations (for people who are not fluent in English).

Written information can also be made accessible in an alternative way, either face to face or via telephone or video link, for people with lower levels of literacy in English, for example through interpreters for minority ethnic languages, or through sign language interpreters for people who are deaf.

What is produced needs to be of a quality that is fit for purpose and appropriate to the target audience. It needs to be delivered in a timely way within expected timescales. Some information is more time sensitive than others so organisations need to allow for flexibility to respond quickly. Information to be discussed at a meeting needs to be made available well in advance of the meeting.

3. Why produce information in accessible formats?

Effective information is vital for the provision of high quality services. If people cannot get our information, read it, hear it or understand it our information is of little value. As a consequence, people with specific needs may be excluded from accessing our information and services.

The law says that we need to make our services accessible¹. The information that we provide is key to this. We always need to

¹ Relevant legislation includes: Disability Discrimination Act 1995 (Amendment) Regulations (Northern Ireland (2004); Race Relations Order 1997; Human Rights Act 1998; Section 75 of the Northern Ireland Act 1998; the United Nations Convention on the

consider the risk of treating people less favourably if we don't provide information in an accessible format².

4. Which information should be produced in accessible formats?

In theory all information that is provided to the public should be made available in accessible formats. However given the quantity of information that is produced by our organisation and the fact that there are limited resources it is accepted that this is not possible.

Whilst we will strive to follow minimum formatting standards in all our information we will need to prioritise which information we produce in alternative formats – both upfront and in responding to requests we receive. To do so, we need to ensure that a robust decision making process is in place. Our decisions need to be reasonable and evidence based in the context of balancing the rights of individuals to have equal access to information by receiving it in an appropriate format.

We will use the following criteria to prioritise on the basis of greatest impact for service users:

Corporate

- Is the documentation about providing basic information on what the organisation does, how individuals can make contact with the organisation, provide feedback or obtain details on how to make a complaint?

Service Related

- Is the documentation about providing details on what individuals can expect of the organisation and of staff who deliver the service? For example, Customer Care Standards, Patient and Client Experience Standards.
- Does the service involve gaining informed consent from individuals?
- Is the documentation required as part of court reports, for example, witness statements in family law proceedings?

Rights of Persons with Disabilities; the United Nations Convention on the Rights of the Child.

² The Equality Commission for Northern Ireland provides further guidance in their Codes of Practice.

- Does access to the service require an application by individuals? For example, medical cards or free eye tests.
- Does not having the information pose a risk to the health and well-being of the individual or a substantial risk to life, for example, appointment letters?

Target Audience

- Does the documentation target children or young people or individuals who have language needs, sensory impairment needs or have a learning disability? For example, leaflets on how to register with a General Practitioner.
- Within the target audience is it likely that individuals with particular communication needs form a sizeable share? For example, bowel cancer screening where the target audience is aged 60-71 and information to pensioners and dependants under the HSC Pensions scheme.

Reasonable alternatives

Within the priority areas as identified in this Section where it is more effective, cost efficient or timely to do so we will ensure a reasonable alternative is provided. Examples could include:

- Providing information face to face;
- Providing information by telephone or email;
- Using an interpreter;
- Providing summaries.

Staff should seek Equality Unit advice to determine which information should be prioritised for alternative formats.

When responding to requests for information in alternative formats staff should communicate closely with the individual, both to discuss their needs and ways of meeting these and ultimately to convey the decision taken and its rationale.

5. Accessibility statement

All documents need to include contact details of the information author or respective BSO service area and an accessibility statement in English at the start of the document. The statement should say:

“Any request for the document in another format or language will be considered.”

In addition, staff should consider translating and including the following statement into the most common minority ethnic languages as identified by the Northern Ireland Health and Social Care Interpreting Service and the European Charter on Regional and Minority Languages:

“Any request for the document in another language will be considered.”

If any accessible formats or other languages have already been produced staff need to include the following statement:

“This document is available in ... [list the formats and languages] but any further requests for the document in another format or language will be considered.”

In addition, staff should consider translating and including the above statement into the most common minority ethnic languages as identified by the Northern Ireland Health and Social Care Interpreting Service and the European Charter on Regional and Minority Languages.

6. Who funds accessible information?

The responsibility for meeting the cost of producing and disseminating information in accessible formats lies with the service area producing the information. For any corporate information, the organisation will fund the information from corporate overheads.

7. Practical advice on making information accessible

Practical guidance is available at **Appendix 1**.

Part 1 of the guidance outlines general advice on making information accessible. Part 2 provides advice on making information accessible for and inclusive of particular equality groupings. These include: sensory impairment, learning disability, people with dyslexia or literacy difficulties, sexual orientation, older people, younger people, translation and interpreting for minority ethnic groups.

Health and Social Care Trusts have also produced guidance in relation to people with a disability. You can access this guidance on <http://www.belfasttrust.hscni.net/MakingCommunicationAccessible>.

8. Organisational commitments - roles and responsibilities

The Director of Human Resources and Corporate Services as lead Director will ensure that:

- There is a clear structure and process in place for implementing, monitoring and reviewing the policy and associated guidance and for undertaking any associated reporting.

All Directors, Assistant Directors and Heads of Service will ensure that:

- Decisions taken on the production of information in accessible formats in their area of responsibility are reasoned, evidence based and in line with the identified priorities.
- Funding is available in accordance with the priority areas for the provision of information in accessible formats.
- Reporting on progress is provided as an integral part of Directorate reporting to the Equality Commission on equality scheme commitments.
- Staff are made aware of the policy.

Information Authors will ensure that they:

- Follow the Accessible Formats Policy and related guidance
- Produce alternative formats in line with this policy.

Equality Unit staff will:

- Provide support and advice in relation to all aspects of the implementation, monitoring and review of this policy as well as on progress reporting.

9. Review

This policy will be reviewed on a three-year basis. If legislation changes or if there are major changes to policy or practice then the date for review may be brought forward.

10. Monitoring

Monitoring of this policy and associated guidance will take place on a regular basis. This will capture information on the provision of information in accessible formats and the number of requests made and type of formats requested and costs.

11. Equality Screening

This policy has been screened for equality and human rights implications. The key purpose of the policy is to ensure that those groups who face barriers in accessing our services and information are included in the same way as others. Equality and human rights issues have been incorporated into the policy development and consultation process. The outcome of the screening exercise is available on our website on:

<http://www.hscbusiness.hscni.net/services/2166.htm>