



Mower's Ark CIC

50 Broadway, Kettering, Northamptonshire, NN15 6DD

Review Sheet



Last Reviewed
21 Oct '19



Last Amended
21 Oct '19



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

Business impact



MEDIUM IMPACT

Changes are important, but urgent implementation is not required, incorporate into your existing workflow.

Reason for this review

Scheduled review

Were changes made?

Yes

Summary:

Policy introduced to supplement other policies relating to meeting communication needs. As well as the requirements of the Accessible Information Standard, information about the 'Active Offer' have also been included. References reviewed to ensure they remain current.

Relevant legislation:

- The Welsh Language (Wales) Measure 2011
- Equality Act 2010
- Mental Capacity Act 2005
- Access to Health Records Act 1990
- Social Services and Well-being (Wales) Act 2014
- The Regulated Services (Service Providers and Responsible Individuals) (Wales) Regulations 2017
- Data Protection Act 2018

Underpinning knowledge - What have we used to ensure that the policy is current:

- Author: NHS England, (2017), *Accessible Information Standard*. [Online] Available from: <https://www.england.nhs.uk/ourwork/accessibleinfo/> [Accessed: 10/21/2019 12:00:00 AM]
- Author: NHS England, (2017), *Accessible Information Standard Implementation Guidance*. [Online] Available from: <https://www.england.nhs.uk/wp-content/uploads/2017/08/implementation-guidance.pdf> [Accessed: 10/21/2019 12:00:00 AM]
- Author: Care Inspectorate Wales, (2019), *More than just words*. [Online] Available from: <https://careinspectorate.wales/more-just-words-follow-strategic-framework-welsh-language-health-social-services-and-social-care> [Accessed: 10/21/2019 12:00:00 AM]

Suggested action:

- Encourage sharing the policy through the use of the QCS App
- Add the policy to the planned team meeting agendas
- Share 'Key Facts' with all staff
- Ensure relevant staff are aware of the content of the whole policy



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**1. Purpose**

1.1 To make sure that Supported Individuals (and those important to them) who have a disability, impairment, or sensory loss, get information that they can access and understand.

1.2 To meet the legal requirements of the regulated activities that Mower's Ark CIC is registered to provide:

- | The Welsh Language (Wales) Measure 2011
- | Equality Act 2010
- | Mental Capacity Act 2005
- | Access to Health Records Act 1990
- | Social Services and Well-being (Wales) Act 2014
- | The Regulated Services (Service Providers and Responsible Individuals) (Wales) Regulations 2017
- | Data Protection Act 2018

**2. Scope**

2.1 The following roles may be affected by this policy:

- | All staff

2.2 The following Supported Individuals may be affected by this policy:

- | Supported Individuals
- | 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 Mower's Ark CIC complies with the Accessible Information Standards, and that staff at Mower's Ark CIC consider how they will apply the standards.

3.2 For Mower's Ark CIC to have a clear, consistent, transparent and fair approach to the provision of accessible, inclusive information and communication support to all.

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**4. Policy**

4.1 All staff at Mower's Ark CIC have a responsibility to make information accessible and inclusive.

4.2 Mower's Ark CIC will comply fully with the 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 Supported Individual'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 Accessible Information Standard, and Mower's Ark CIC will be able to demonstrate compliance through audit and quality assurance processes.

4.4 In line with Data Protection legislation, Mower's Ark CIC will enable Supported Individuals to access their records when requested, and this includes the right to review and amend their documented communication preferences.

4.5 Where Supported Individuals 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.

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**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 Supported Individual 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 Supported Individual's record is accessed, and prompt for action.
4. **Share:** Include information about the Supported Individual'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 Supported Individual 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 Supported Individual. This information gathering will include identifying how the Supported Individual manages this and what support they will need from staff in order to enable effective communication.

Angelica Phillips must determine before commencing Care that Mower's Ark CIC can meet the communication needs of the Supported Individual. Staff must avoid making any assumptions about Supported Individuals communication needs, and will 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 Supported Individual's condition changes. As part of this, staff will revisit and identify any new communication needs and support accordingly.

5.4 Angelica Phillips will consider how to promote enabling all individuals accessing Mower's Ark CIC to express their communication needs and wishes.

There are a range of resources (e.g. posters and leaflets) that can be accessed via NHS Wales that can help to raise awareness that Mower's Ark CIC will accommodate different communication preferences (refer to the further reading section of this policy).

5.5 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 will be in accordance with the defined clinical terminology and assurance will be gained that persons receiving this shared information understand it.

5.6 Step 3 - Alert/ Flag/ Highlight

Mower's Ark CIC staff must have systems in place to ensure that records (electronic or paper-based) clearly flag that the Supported Individual 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 Supported Individuals must have systems in place to not send these where it would be inappropriate or inaccessible for that person. Mower's Ark CIC will investigate and learn from any incidents of this nature.

5.7 Step 4 - Share

Consent will be gained from the Supported Individual who has identified specific communication preferences and needs in relation to sharing this information. Where consent cannot be obtained due to reduced capacity, staff will refer to the Mental Capacity Act Policy and Procedure of Mower's Ark CIC 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 Supported Individuals.

5.8 Step 5 - Act

Staff must be aware of how to adapt their own communication styles to meet the needs of a Supported

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Individual, and they must also be competent with the use of any techniques or aids used by Supported Individuals.

It is acknowledged that it may take time to establish communication needs from Supported Individuals that choose to not disclose this information, and they will be encouraged to discuss their needs with staff.

5.9 Supported Individuals who use limited or no English/Welsh, 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 Supported Individual to access this and will work with any advice and support offered by the interpreter. Where the Welsh language is preferred staff will support Supported Individuals, as referenced in section 5.14 of this policy.

5.10 Where staff are required to support Supported Individuals 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 Supported Individual (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 Angelica Phillips.

5.11 Environment

Although the Accessible Information Standard does not include environmental or facilities matters, some aspects apply to Supported Individuals with a disability, impairment, or sensory loss, in order to facilitate communication.

Staff will always consider whether some rooms are 'better' than others for people with communication needs, e.g. less clutter, improved lighting, soundproof. Staff will consider lighting, in particular where lip reading is vital for the Supported Individual.

Angelica Phillips will accommodate communication aids that support individuals with communication, such as loop systems in agreement and review with Mower's Ark CIC.

5.12 Conversion of Format

Angelica Phillips will consider in advance how to facilitate conversion of key documents, policies and procedures in a timely manner. Angelica Phillips will identify which communication formats can be used or produced within Mower's Ark CIC. 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 Mower's Ark CIC. Angelica Phillips will consider how needs can be met by use of remote, virtual, digital and telecommunications solutions, as well as paper format.

5.13 Staff will refer to the Individuals with Communication Difficulties Policy and Procedure of Mower's Ark CIC for practical support and procedures that can extend to any person accessing Mower's Ark CIC.

Time will be factored into accommodating communication needs, as some Supported Individuals may need longer periods of time to process information than others.

5.14 Active Offer

Mower's Ark CIC will encourage all staff to make an 'active offer' to Supported Individuals, which will allow the service to be provided in Welsh without a Supported Individual having to ask for it. Some key ways this will be achieved at Mower's Ark CIC include the use of:

- | Bilingual greetings
- | Bilingual information to Supported Individuals (i.e. signs, menus, Supported Individual guides etc.)
- | Partnership working with the Local Authority's Welsh Language Officer

For further information on the 'active offer' visit the further reading section of this policy.

5.15 Training and Education

New staff joining Mower's Ark CIC will receive an induction that includes communication. For new Care Worker, they will also be required to complete the Care Certificate which includes standards around communication.

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Ongoing, staff will be encouraged to develop their learning further. This will be identified through supervisions and appraisals, and by training needs analysis.

5.16 Audit and Review

Angelica Phillips 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 Supported Individuals. Overarching quality assurance checks of Mower's Ark CIC will identify meeting the needs of any Supported Individual accessing Mower's Ark CIC. Any findings of discrepancy will be immediately acted upon and reflected upon to ensure the risk of reoccurrence is reduced.

Supported Individuals will be supported to provide feedback about their experiences, with information received by Mower's Ark CIC 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/ Welsh, 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

6.4 Active Offer

- | Providing a service in Welsh without someone having to ask for it. The Welsh language should be as visible as the English language

**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:

- | Mower's Ark CIC recognises that you may have specific communication requirements and will ensure this is accommodated
- | Mower's Ark CIC 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
- | Mower's Ark CIC will seek your feedback on information sharing as a means of improving its service



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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:

Gov.Wales - Active Offer Information Pack:

<https://gov.wales/sites/default/files/publications/2019-04/delivering-the-active-offer-information-pack-social-services-and-social-care.pdf>

Skills for Care - Communication Skills in Social Care:

<https://www.skillsforcare.org.uk/Documents/Learning-and-development/Core-skills/Communication-skills-in-social-care.pdf>

National Register of Communication Professionals working with Deaf and Deafblind people:

<https://www.nrcpd.org.uk>

National Register of Public Service Interpreters:

<http://www.nrpsi.org.uk>

The Royal National Institute of Blind people and Sense can offer further information about braille and communication formats:

<https://www.rnib.org.uk/practical-help/reading/braille-and-moon-tactile-codes>

<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

<https://www.actiononhearingloss.org.uk/how-we-help/information-and-resources/publications/communication/>

<https://www.signhealth.org.uk/about-deafness/sign-language/>

When producing different communication formats, Gov.uk has produced guidance to support providers:

<https://www.gov.uk/government/publications/inclusive-communication/accessible-communication-formats>

The Stroke Association have produced an animated guide to communicating with people with aphasia, as well as a guidance sheet:

<https://www.youtube.com/watch?v=hTh86NoQh7Q>

<https://www.stroke.org.uk/resources/helping-someone-communication-problems>

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**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
- | Mower's Ark CIC 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 Mower's Ark CIC is acted on in a timely manner as part of quality assurance processes
- | The 'active offer' is fully embedded in the service, with a bilingual environment clearly evident

**Forms**

There are currently no Forms attached to this policy.



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