Accessible Information Standard 2021-22: Compliance Report

1. Introduction

NHS Cheshire CCG is responsible for commissioning or "buying" health and care services for the people of Cheshire. We use our budgets to ensure high-quality, sustainable healthcare for our patient population of more than 720,000 people.

Effective communication and engagement with the people living in our CCG area, our GP members, partner organisations and the voluntary sector is central to achieving our vision of a more joined-up healthcare system that is safe, affordable and meets the needs of the local population.

NHS Cheshire CCG produces and publishes a range of information about healthcare. It is essential that this information is as easy to access and understand as possible by the intended audiences, which may include members of the public accessing healthcare services and their families, or a health or social care professional acting on behalf of a patient.

Therefore, it is vital that the communication needs of people are considered when developing corporate communications and information.

The CCG needs to ensure that the information it provides is of high quality and is accessible, e.g., available in alternative formats on request; is clear, easy to use and accessible specifically to the patient and/or their carer. This ensures that no one is unintentionally excluded from accessing and understanding information produced by the CCG.

2. Background

NHS Cheshire CCG has a legal responsibility under the Equality Act (2010) to provide any of its documents, leaflets and electronic resources in an alternative format if requested.

In June 2015, the Standardisation Committee for Care Information (SCCI) approved a new "Accessible Information Standard". All organisations that provide NHS or adult social care services must follow the Accessible Information Standard by law (under Section 250 of the Health and Social Care Act 2012).

The changes apply to both materials produced by the CCG and its GP member practices. The CCG is committed to supporting GP member practices to ensure they are compliant with the standard. The changes had major implications for NHS provider organisations, and clinical commissioning groups, which also have a responsibility to ensure commissioned NHS provider organisations are meeting the standard in the materials they produce for patients.

The Accessible Information Standard, which was made mandatory on 1 April 2016, was the first part of a formal process to develop, assure and publish "information standards" overseen by the Health and Social Care Information Centre (HSCIC).

The main purpose of the Accessible Information Standard is to identify and meet the information and communication support needs of patients, service users and carers where those needs relate to a disability, impairment or sensory loss. This includes (but is not limited to) people who are blind, deaf, deafblind and/or who have a learning disability, aphasia, autism or a mental health condition which affects their ability to communicate.

The standard provides some evidence that organisations have **'due regard'** for the needs of people from groups protected under the Equality Act (2010) and that they promote fairer access to services as specified by the Public Sector Equality Duty (PSED).

3.   Legal Requirements
The Equality Act (2010) and the Health and Social Care Act (2012)
NHS Cheshire CCG is committed to making sure all information that it produces is clear, easy to understand and accessible. The Equality Act and Section 250 of the Health and Social Care Act (2012) require CCGs to meet these legal requirements.

The Equality Act requires CCGs to actively:

- **Eliminate** unlawful discrimination, harassment and victimisation
- **Advance** equality of opportunity between different protected characteristics
- **Foster** good relations between different protected characteristics.

These are the three aims of the PSED, which must be met by all public sector bodies including CCGs and their service providers.

The Equality Act requires CCGs to make reasonable adjustments for people with a disability, which includes taking measures to ensure that information is available in accessible formats.

The Accessible Information Standard

The NHS "Accessible Information Standard" directs and defines a specific and consistent approach to identifying, recording, flagging, sharing and meeting the information and communication support needs of patients, service users, carers and parents, where those needs relate to a disability, impairment or sensory loss.

The Standard applies to service providers across the NHS and adult social care system. Commissioners of NHS and publicly-funded adult social care must also have regard to this standard, in so much as they must ensure that contracts, frameworks and performance-management arrangements with provider bodies enable and promote the Standard's requirements.

As part of the Accessible Information Standard, organisations that provide NHS or adult social care must do five things. They must:

1. **Ask** people if they have any information or communication needs and find out how to meet those needs
2. **Record** those needs clearly
3. **Highlight** or flag the person's file or notes with identified information or communication needs and how to meet those needs
4. **Share** information about people's information and communication needs with other providers of NHS and adult social care services, when they have consent or permission to do so
5. **Take steps** to ensure that people receive information which they can access and understand and receive communication support if they need it.

Web Accessibility Regulations (2018)

Web accessibility means ensuring a website or mobile app can be used by as many people as possible. This includes those with:

- Impaired vision
- Motor difficulties
- Cognitive impairments or learning disabilities
- Deafness or impaired hearing.

Ensuring accessibility means considering that some users may need to use tools such as:

- Screen reader
- Braille display
- Screen magnifier
- Adapted keyboard / mouse
- Speech recognition software.

Web Accessibility Regulations legislation

Public sector organisations have a legal duty under the Public Sector Bodies (Website and Mobile Applications) (No. 2) Accessibility Regulations 2018 to make sure their websites and mobile applications meet accessibility requirements.

Public sector websites must be accessible and must publish an accessibility statement that should be reviewed annually and should include information regarding:

- Whether the organisation's website / app is "fully", "partially" or "not" compliant with accessibility standards
- If the website / app is not fully compliant, an explanation of which parts are not accessible and why (e.g. whether the content is exempt)
- How people can get alternatives to content that is not accessible to them
- Description of, and a link to, a contact form which enables the user to report any accessibility problems
- A link to the enforcement procedure set out in Part 5 of the web accessibility regulations
- A record / roadmap of any changes / improvements made.

4. Purpose

This report aims to give assurance regarding the following:

- All CCG employees with a specific responsibility for producing accessible information are well informed about the Accessible Information Standard and their roles and responsibilities
- Provider organisations are aware of the standard and meet the requirements of the standard in the provision of healthcare services to members of the public living in the CCG area
- The CCG is aware of how well its resources and website comply with the Accessible Information Standard and Web Accessibility Guidelines and can identify any areas for improvement.

The Accessible Information Standard relates to producing clear information in a range of accessible formats, and on request from patients and their primary carers. These are defined as:

- Publications
- General communications (e.g., emails, documents and digital presentations)
- Digital products (e.g. websites, applications, content and social media)
- Audio-visual content (e.g. online films, audio and DVDs).

5. Approach

NHS Cheshire CCG publishes the following documents in relation to the Accessible Information Standard:

- **Engagement and Communication Strategy**
- **Equality and Inclusion Strategy 2020-24**
- **Equality Annual Report 2020-2021** (published annually)
- **Accessible Information Standard webpage**
- **Accessibility Statement**

The **Communication and Engagement Strategy** highlights that the CCG has reviewed communications and engagement methods, processes and practices in order to understand what the organisation needs to do to make sure the voices of local communities and service users are not just heard, but listened to, and help to shape the services that the CCG provides. One of the main objectives of the strategy is to develop innovative ways of involving people who would not ordinarily engage with the CCG - this includes exploring how the CCG can better involve people of all ages, ethnically diverse groups, and people with communication difficulties and their carers.

The strategy states that Equality Impact Risk Assessments (EIRAs) will be carried out for each communications and engagement exercise undertaken, and the EIRA process includes questions relating to the NHS Accessible Information Standard.

The **Equality and Inclusion Strategy and the Engagement and Communications Strategy** outline the CCG's approach to ensuring that it meets its legislative duties regarding equality, diversity, and inclusion, while ensuring that it underpins all activities, plans, processes, policies, and organisational development. The strategy specifically reinforces the CCG's commitment to improving accessibility and information, and to communicate with people in the most appropriate way, using language and formats that they understand.

An **Accessible Information Standard webpage** is published on the CCG's website and makes explicit the CCG's commitment to ensure that the information it publishes and distributes is accessible to as many users as possible. The Information Accessibility Statement advises that information is available upon request in a variety of formats including large print, Braille or audio format. The CCG also states that it can provide help for British Sign Language users and provide information in languages other than English. The CCG's Information Accessibility Statement also highlights that the CCG can print documents if required.

The **Accessibility Statement** is published on NHS Cheshire CCG's website and applies to the CCG's website. The CCG's website is accessibility checked annually.

The Accessibility Statement highlights the CCG's commitment to ensuring that as many people as possible are able to use the website and, as well as making the website text as simple as possible to understand, the statement advises that website visitors should be able to:

- Change colours, contrast levels and fonts
- Zoom in up to 300% without the text spilling off the screen
- Navigate most of the website using speech recognition software
- Listen to most of the website using a screen reader.

The Accessibility Statement includes information relating to how compliant the website is with web accessibility standards and the content that is not within the scope of the accessibility regulations.

The Accessibility Statement contains information regarding how people can get content that may not be accessible to them and provides information regarding how website visitors can report any accessibility issues. There is information and a link to the enforcement procedure set out in Public Sector Bodies (Websites and Mobile Applications) (No. 2) Accessibility Regulations 2018 (the 'accessibility regulations').

Engagement Activity

Full compliance with the Accessible Information Standard requires organisations to go beyond the provision of accessible digital information. It also expects organisations to demonstrate their commitment to making information accessible to minority and marginalised communities through their engagement activity.

Examples of such activity include the CCG's work with partners to engage marginalised communities in the Covid-19 Vaccination Programme.

Covid brought into sharp focus the disproportionate impact of the pandemic on some of the most vulnerable people in our communities.

Amid the roll-out of the Covid vaccination, a number of groups was identified as being especially vulnerable to serious illness, hospitalisation or death – including those who do not typically engage with mainstream provision.

Local insight, co-ordinated by the CCG, led to a targeted engagement approach which included:

Ethnic communities

- Cheshire, Halton and Warrington Race and Equality Centre recruiting community connectors to share translated information and gather insight into vaccine hesitancy
- Pathways CIC engaging in Cheshire East to reach out to Eastern European communities through a network of connectors and social media messages in their first language
- Insight gathered from the work with Eastern Europeans was used to inform Public Health England national messaging
- Working with large employers and recruitment agencies to encourage Eastern European workers to take the vaccine
- Faith sector engaged to address vaccine-hesitant cultural concerns
- Text messaging and letters to digitally-excluded communities
- Multi language materials.

Marginalised communities

- Healthwatch working in collaboration with the River Chaplaincy to engage with Cheshire's boating community. GP Access Cards were used to support residents of no fixed abode to register with a GP.
- Cheshire's Gypsy and Traveller Liaison Officers are sharing key messages and videos via WhatsApp community groups, undertaking lateral flow tests and engaging with the community to discuss the vaccine. Clinical directors are working with gypsy and traveller liaison officers and community services teams to vaccinate traveller communities.
- Local gypsy and Irish traveller support group commissioned to work with the community to create videos and picture-book-style information leaflets for those who find reading a challenge
- Farming community influencers have been identified to support messaging to this community.
- Working in partnership with Reaseheath Agricultural College to engage students from rural communities as local influencers.

Learning disabilities and autism

- National resources tested with people with learning disabilities or autism to determine the most appropriate assets to use.
- Cheshire Disability Access Forum providing information and reasonable adjustment care plan.
- Adjustments made at vaccine hubs to accommodate needs such as quiet spaces, escorted vaccines and numbing creams for needle phobia. This was supported by a video in simple language to explain what to expect at the vaccine centres.

Mental illness

- Staff toolkit developed to support visits and online conversations.
- Messages shared from clinical director, lead nurse and pharmacist.

Homelessness and rough sleepers

- Health protection and homelessness teams are providing access to a Covid vaccine for local people experiencing homelessness and rough sleeping – including "couch-surfers" and those in hostels.
- Foodbanks and homeless centres providing vaccination information.
- Community sector organisations are helping to identify the most appropriate locations to vaccinate people.

Asylum seekers

- Worked with housing providers to identify additional locations where homeless people are living to ensure they were offered a Covid vaccination.
- Worked with the Asylum Seekers' and Refugees' Partnership Group to ensure key messages were shared about the Covid vaccine.

Young People

- Pathways CIC engaged in Cheshire East and West to recruit young people to develop messages and gather insight from people aged 18-30.
- Healthwatch conducted a survey of 18 to 30 year olds to understand experiences and perceptions about the vaccine.

Maternity

- Focus Group held in partnership with Healthwatch to understand concerns of women of childbearing age about pregnancy, fertility and contraception.
- Videos produced by clinicians to address concerns.

6. Providers

All providers commissioned by the CCG have a key role to play in assisting people to make fully informed decisions about their healthcare. As such, providers must deliver services that demonstrate their commitment to equality, diversity and inclusion and that meet their legal and NHS-mandated duties including the Accessible Information Standard. The CCG's Quality and Performance Teams regularly monitor providers to ensure that they meet these duties in accordance with the NHS Standard Contract.

Contract arrangements are in place to ensure that primary and secondary care providers have access to translation and interpretation providers to carry out clinical assessment and treatments with patients. Similarly, the CCG also uses translation and interpretation services to ensure that people can access the following:

- Public meetings such as the Governing Body
- Public engagement events
- Communications on health campaigns
- Formal consultations
- Patient experience services.

7. Conclusion

NHS Cheshire CCG complies with the requirements of the Public Sector Equality Duty and the NHS Accessible Information Standard. The CCG has a thorough strategy and process in place relating to the Accessible Information Standard, which is prioritised and embedded throughout daily business.

Through the NHS Standard Contract, the CCG ensures that commissioned services also comply with the Accessible Information Standard and this is quality checked on a regular basis. The CCG's robust and transparent patient and stakeholder engagement mechanisms enable a positive response to communication and information needs. Patients are able to request information about their healthcare in formats that meet their needs – this also extends to partners and providers.

NHS Cheshire CCG is committed to good quality healthcare provision that meets the needs of patients regardless of their circumstances, identities or backgrounds.

Report prepared by MLCSU Equality and Inclusion Team – July 2021