

Accessible Information Standard Compliance Report 2021-22

Introduction

NHS Halton and Warrington CCG is responsible for commissioning or “buying” health and care services for the people of Halton and Warrington. We use our budgets to ensure high-quality, sustainable healthcare for our patient population of Halton and Warrington.

Effective communication and engagement with the people living within our CCG areas, our GP members, partner organisations and the Third 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 Halton and NHS Warrington CCGs 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 CCGs 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 CCGs.

Background

NHS Halton and NHS Warrington CCGs have a legal and moral responsibility under the Equality Act (2010) to provide any of its documents, leaflets, 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 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 CCGs and its General Practitioner (GP) member practices. The CCGs are 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, who 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 01 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 service as specified by the Public Sector Equality Duty (PSED).

Legal Requirements

The Equality Act (2010) and the Health and Social Care Act (2012)

NHS Halton and NHS Warrington CCGs are committed to making sure all information that it produces is clear, easy to understand and accessible. The Equality Act (2010) and Section 250 of the Health and Social Care Act (2012) require clinical commissioning groups to meet these legal requirements.

The Equality Act (2010) 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 Public Sector Equality Duty, which must be met by all public sector bodies including CCGs and their service providers.

The Equality Act (2010) requires clinical commissioning groups 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 so they have 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, 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, 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

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

Approach

NHS Halton and NHS Warrington CCGs publishes the following documents in relation to the Accessible Information Standard:

- Equality and Diversity Strategy
- Equality Annual Report 2020-2021 (published annually)
- Accessible Information Standard webpage
- Accessibility Statement

The Equality and Diversity Strategy outlines 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 Halton and Warrington 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').

Our engagement and communications methods are varied and wide and we regularly review our 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 CCGs provides. One of the main objectives of our engagement work is to develop innovative ways of involving people who would not ordinarily engage with the CCGs - this includes exploring how the CCG can better involve people of all ages, ethnically diverse groups, and people with communication difficulties and their carers.

We also ensure 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.

Providers

All providers commissioned by the Halton and Warrington CCGs 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 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

Conclusion

NHS Halton CCG and NHS Warrington 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.

Overall, NHS Halton CCG and NHS Warrington 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

Case Studies

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.

Case Study - Let's Get Vaccinated

From December 2020 with the roll out of the national vaccination programme a large-scale communications and engagement campaign was launched to:

- Ensure that the key messages about the vaccine roll out and the vaccine was communicated effectively to all parts of the community
- To ensure that the messages were accessible for all and
- To understand any barriers and reasons for hesitancy in getting the vaccination

The communication and engagement methods for this varied and it was important that we engaged with underserved communities to understand any barriers and specific hesitancy issues.

- Attended numerous online meetings and spoke to several different stakeholders including the CCGs E&I Group and Health Forum, Warrington Speak Up, Warrington Disability Partnership, Polish School, Mandassor programme and youth groups
- Healthwatch Warrington surveyed their Virtual Voices panel
- Healthwatch Halton undertook a public survey
- Adult social care survey
- Working with Warrington Voluntary Action a meeting with approximately ten Third Sector organisations was arranged to discuss vaccine hesitancy and support that they could give
- Attendance at Halton's VCFSE Response meeting to understand concerns

A joint work plan with both local authorities was created focusing on equality groups and any main themes that were emerging, the main highlights from the workplan are below.

[Frequently asked questions](#) were developed for the website and promoted extensively via social media, partner websites and local media. The web page was redesigned to make it more accessible and to provide answers and resources for the themes of vaccine hesitancy. This included information in other languages, specific information for people with learning disabilities, physical disabilities and refugee and asylum seekers. We have used trusted voices to support the messages i.e., manager of CAB when highlighting messages about scams relating to the vaccine.

A weekly social media briefing was produced so our partners, Third Sector organisations and providers could easily copy and paste our key COVID – 19 messages to their own platforms. This ensured that our messages were being shared with the wider community and by voices that were trusted.

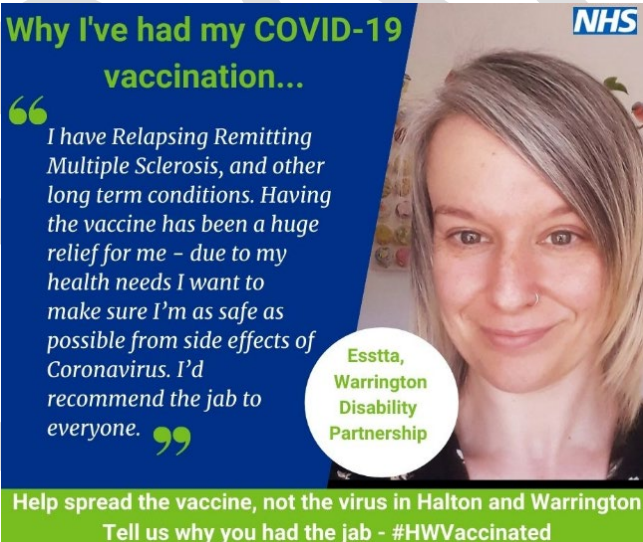
Working with people with disabilities

One of the main themes from the insight work was specific concerns from people with disabilities, these ranged from fertility concerns, accessibility issues of the vaccination centres, concerns and questions relating to specific disabilities and queries around carer and family member vaccines.

Working with Warrington Disability Partnership, a video with one of the Primary Care Network Clinical Directors was produced addressing specific concerns for people with disabilities. The video was shared far and wide using ours and Warrington Disability Partnerships networks.

The Clinical Lead also attended a meeting of the wider Staying Connected Forum to answer any specific questions.

Social media images and quotes were created from local trusted voices and people in the community to encourage other people to have their vaccine.



Why I've had my COVID-19 vaccination...

"I have Relapsing Remitting Multiple Sclerosis, and other long term conditions. Having the vaccine has been a huge relief for me - due to my health needs I want to make sure I'm as safe as possible from side effects of Coronavirus. I'd recommend the jab to everyone."

Essta, Warrington Disability Partnership

NHS

Help spread the vaccine, not the virus in Halton and Warrington
Tell us why you had the jab - #HWVaccinated

Learning disabilities and autism

National resources tested with people with learning disabilities or autism to determine the most appropriate assets to use were shared with our local learning disabilities teams and Third Sector organisations.

Adjustments and support was made and available at local vaccine hubs to accommodate needs such as quiet spaces and escorted Vaccines.

Walk through videos were created of our local vaccination centres so people knew what to expect before they made their appointment and went to the centres.

We attended our local Speak Up group to speak to people with learning disabilities to ask if they had any specific concerns with the vaccine. At the time of speaking to the group their only concern was having to wait for the vaccine as they believed they should have been in a higher priority group set out by the Joint Committee of Vaccination and Immunisation.

Asylum seekers

Working with Halton Borough Council we supported the team working with Asylum Seekers living at the Daresbury Hotel to ensure they had the correct information in an accessible way.

We agreed that the CCG website would be the single source of information for asylum seekers and the organisations supporting them. This information included translated resources.

Maternity and Fertility

Through our insight work issues with fertility was one of the main concerns. We also gathered feedback that the national information and videos did not address their concerns. We produced dedicated questions and answers and a talking heads video was produced and promoted widely to dispel the myths around fertility. The video was shared widely on social media, shared with Third Sector organisations working with families and parents and shared with the trusts for them to promote within their maternity services.

Case Study - Website Accessibility

The CCGs website is an essential source of information for our patients, stakeholders and our local communities. It hosts important governance information and is used as evidence to demonstrate how the CCGs meet their legal duties. A new joint CCG website was launched in October 2020.

The CCG has put in place several actions to ensure that the website is accessible. We have website administrators from each team who are trained to use the content management system and supported by the communications team and the CSU. They are staff who need to update content or documents on the website on a very regular basis. They have responsibility to ensure that accurate and up to date content is added to the website in the most appropriate place and have a responsibility to ensure that ONLY accessible documents are added to the website as per Public Sector Bodies (Websites and Mobile Applications) (No. 2) Accessibility Regulations 2018.

Training for all staff has taken place by the Communications Team on the importance of accessible information and how to make all documents accessible.

Effective report writing training is taking place for CCG staff and again there will be a focus on the importance of reports being accessible.

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