

To: Councillor James (Chair)
Councillors R Williams, Manghnani
and Rowland

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**NOTICE OF MEETING - ACCESS AND DISABILITIES WORKING GROUP 9
SEPTEMBER 2021**

A meeting of the Access and Disabilities Working Group will be held on Thursday, 9 September 2021 at 2.00 pm. This will be an Online meeting via Microsoft Teams. The Agenda for the meeting is set out below.

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- <https://healthwatchreading.co.uk/news/2021-02-02/concerns-raised-about-loss-hydrotherapy>
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DATE OF NEXT MEETING - 25 November 2021

Access and Disabilities Working Group - Thursday, 4 March 2021 1.30 pm

Minutes

Present:

Cllr Rachel Eden, Chair
Cllr Karen Rowland - Lead Councillor for Culture, Heritage and Recreation
Cllr Jane Stanford-Beale
Clare Muir - Policy and Voluntary Sector Manager RBC
Helen Bryant - Access Officer RBC
Peter Absolom - General Manager, Readibus
Chris Wood - Associate Manager, Lead Architect Saunders Boston Architects -
Paul Shearman - GLL Partnership Manager
Ben Stanesby - Leisure and Recreation Manager RBC
Dan Peters - Service Manager Reading Play RBC
Dominic Bennet - Leisure Contract Manager - RBC
Nina Crispin - Information & Engagement Officer - Public Health and Wellbeing Team RBC
Isabelle Redfern - Rehabilitation Officer (Visual Impairment) Short Term Team RBC
Jenny Hazell - Principal Committee Administrator RBC
Bob Bristow - Reading Association for the Blind
Filio Zacharoglov
Alain Marcos

Apologies

Fiona Price - CEO Age UK Berkshire
Brian Oatway - Member of the Public

1. WELCOME AND INTRODUCTIONS

Cllr Eden welcomed everyone, gave a roundup of what was to be discussed and explained how the online meeting would work.

2. MATTERS ARISING

Accessible Communications Policy - on the Agenda

3. COUNCILLORS' DECLARATIONS OF INTERESTS

None

4. RIVERMEAD LEISURE CENTRE AND PALMER PARK

Chris Wood described the new Rivermead Leisure Centre, which was to be built on the site of the existing building. He presented series of slides. He explained that he was leading on designs for both Rivermead and Palmer Park. The new centre was to be built while the existing centre was still in operation and this was to be demolished later once the new one was opened. The new car park was to be located where the bowls court was. There were to be 22 Blue Badge spaces near to the entrance to the centre, and there would be 2 setting down points. The route through the car park was for Blue Badge holders for drop-off for Blue Badge spaces only.

The footpaths would all be suitable for wheelchairs, scooters and so on and would be concrete paved. Coloured tarmac was to be looked at in the next design stage, to differentiate pedestrian routes and car routes, and keep cycle users away from pedestrians for safety reasons.

There was to be a lighting strategy across the scheme.

Trees would have grating over the tree pits, which would be maintained by GLL. New trees were to be in the new scheme. The detailed layout would be looked at again to ensure that the routes were uncluttered and that street furniture would be located in zones away from pedestrian routes.

In the main building the main entrance would have an assistance dog toilet. The location would be reviewed after feedback had been received.

There was a sports wheelchair zone which led into the sports hall. There was to be a number of facilities off the zone including a Changing Places facility accessible for the dry sports area. There would be several storage points for wheelchairs so people could change into sports chairs from their day wheelchairs. Sports England advised on the design. The doors settings were oversized so that sports wheelchairs could get through with their splayed wheels.

There would be several dropped counters and there would be concierge points in the main entrance and kiosks at a suitable height for wheelchair users. There was to be a gate, 1200mm wide for people using sports wheelchairs. There would be a Changing Places facility in the wet change area. There would be accessible showers, WCs and so on. There was a defined route from there to poolside and pool pods were included in both pools. Chris explained how the pool pods worked; they were used to get people in and out of the pools, people would be discreetly lowered into the pool in special wheelchairs, which were adaptable for various disabilities.

There would be 8 person lifts. The routes would be very clearly defined. There would be several changing facilities, serving fitness suites, spin studios, there would be wheelchair refuges and viewing areas overlooking the pool hall.

Stu Pearce said that he would be happy to help with siting the area for assistance dogs.

Ben Stanesby said that there would be a new play area between the demountable pool and the new centre and people would not need to be a member to use the facilities such as the Changing Places WC.

Peter Absolon asked if there was a height barrier for the drop off area for minibuses. Cllr Eden asked if this could be checked.

Chris then went on to talk about the new development at Palmer Park; the existing entrance was off Wokingham Road - this would be widened for coach parking and potentially Readibus also.

There were to be several Blue Badge parking spaces in front of the existing stadium building and a dedicated set of Blue Badge parking spaces were to be placed right by the new entrance. The new entrance would serve both buildings and the parking spaces would be in a zone very close to the main entrance. One zone would be shared with family parking. Everybody who parked in the Blue Badge spaces would have level access to the new building. There were hard surfaces suitable for wheelchair users and the detailed design including colours of tarmac and paving would be looked at to differentiate between all the different areas, including the car park and pedestrian zones. Tree pits were to be covered with grids.

There would be an assistance dog toilet area, close to the Blue Badge parking bays - again there would need to be a discussion about the siting of it.

There was to be a sports wheelchair zone for users who used sports wheelchairs in the athletics area - and there would be a Changing Places facility and a new refurbished accessible change area in the existing stadium. There would be an accessible route through the building to the track and field.

There were dropped counters and signup areas ready for wheelchair users. In the main wet change area, you can either get to the pool pod or get to the existing area where there would be dry side changing facilities for wheelchair users.

On the first floor, there would be a staircase to the main central core, with an 8-person lift, and people could get to the dry change above the pool and the fitness suite or to the stadium, via a series of ramps to access the studios and stadium seating. Wheelchair refuges were included in all the vertical circulation cores. The plan was easily understood and logical and accessible.

Cllr Stanford-Beale asked if there was to be family parking. Chris confirmed that there was a zone within the main carpark layout where the existing Blue Badge parking was - the idea was to have a pedestrian route with larger spaces. Some bays were to be retained as Blue Badge parking, and some for-family parking, near to the main footpath.

Chris said that the zoning would be looked at at the next detailed design stage.

Marcos asked about provision for electric charging within the Blue Badge spaces. Chris said that there was a selection of charging spaces in standard parking bays and could consider charging spaces in some of the larger spaces or designated Blue Badge parking. The siting of some of the EV parking spaces was to be discussed. Cllr Eden endorsed the question given the national and local commitments to zero net carbon.

Bob Bristow welcomed the use of colour contrasted tarmac and paving but asked what was being planned for people who were completely blind; was there any way to indicate the way externally? Chris said that internally there would be a radar system. Bob said that the assumption generally was that colour was helpful, but it was not so straightforward. Chris said that they would be limited to the immediate area of the stadium, but that Ben and his colleagues would need to answer. Ben said that Bob would need to have a discussion with him to deliver the best solution. Bob said that he was willing to assist with this, as was Stu. Isobelle said that she was very happy to get involved with this also. It was difficult to get from the bus route to the stadium; Isobelle had already tried this with a service user. Helen Bryant would get a group together.

Cllr Stanford-Beale asked about the surfaces and textures that would be used inside; would surfaces designed to reduce echo and noise be used? It was difficult for people with different impairments, such as autism and hearing impairments. Chris said that the firm followed design guidelines published by Sport England which did consider these issues. This would be looked at at a later stage. Bob said that reflective surfaces were also difficult.

Cllr Eden said that the issue of EV parking and charging was relevant to the Rivermead development as well as Palmer Park. Paul Sherman said GLL worked for years with the Alzheimer's Society and most of the Reading staff had had Dementia Friends awareness training. He hoped that those who had had training would be working in the new leisure centre. Cllr Eden thanked everyone for their contribution.

6. PROSPECT PARK PLAY CENTRE

Ben Stanesby shared the outline proposals for the new play centre in Prospect Park. He said that they were not as developed as those for the sports centres. Ben said that the Play Team functioned throughout the borough and the function was to

provide support for young people, including teaching them how to get to school independently and respite. At Prospect Park there was a pavilion that used to be for grounds maintenance and which was to be converted into a play centre to provide broader facilities.

Ben showed a plan detailing what the centre would look like. There was a large car park which needed to be made more accessible. There was to be a low-ropes course for children under 7 years old, a café and an outdoor education area for archery and other activities. Children who were excluded from school could be accommodated and meeting space for groups. There would be accessible WCs and the plan was being reviewed to find space for a Changing Places facility. There would be a mini-golf area, which was accessible to many. Directly opposite the pavilion would be a playground, because the water table was very high at the existing playground which was often unusable.

Accessibility to the building and car park was very important and the car park entrance needed to be reviewed as vehicles over 2m high could not get through the barrier. The surface was grasscrete, which was difficult to move on and the internal layout of the centre also needed to be changed. Ben said that he would come back when the plans were more detailed and asked if there were any questions.

Cllr Eden asked about the use of the Changing Places toilet - would it be for ordinary park users as well as centre users? Would the new surface of the playground be accessible for wheelchair users?

Cllr Stanford-Beale thanked Ben and the Team for all their work. She said that the funding was coming from the Community Infrastructure Levy (CIL). The Council had been pressing for an accessible playground for all. It was good to have something within the Borough and within one of the parks. She said that there had been detailed discussions about the centre, including making sure that there was adequate parking for disabled drivers/passengers and that all play areas were accessible. Some surfaces were unsuitable for walking on for those who had walking difficulties. Local groups would like to be able to hire a facility like this which would generate income for the Council.

Helen Bryant said that she was very pleased with this, and especially that there was to be a Changing Places facility.

Ben responded to the questions; there were to be several consultations about the centre, and about the design of the buildings and the provision of parking would be part of it. Ben said that surfaces would be covered. There would be a separate consultation about the design of the play area. Cllr Eden said that the Group very much appreciated the early consultation with the group, and that the Play Task and Finish Group would work with Ben and the team.

7. ACCESSIBLE INFORMATION AND COMMUNICATIONS POLICY

Clare Muir said that she had been working on an Accessible Information and Communications Strategy, which was part of the Council's wider Customer Experience Strategy. Clare and Aisling Gill-Docherty had prepared a report which made some recommendations which they wanted to pursue, and to get a decision in June, to consolidate a number of findings of good practice that have come out of the National Health's Information Standards and the web accessibility compliance standard and try to make it more widely spread throughout the Council. Cllr Eden said that there may need to be a special meeting about this as the timing was not corresponding to the Group's normal meeting cycle.

8. AOB

Cllr Eden said that there had been a change in priorities for the vaccination programme; that anybody who was on the learning disability register was being moved up the priority list - it emphasised the importance of being on that register.

Cllr Stanford-Beale said that Reading Mencap had done a lot of work to make sure that people with learning disabilities would be higher up the register, and that some GPs had been letting some parents with a learning-disabled person have the vaccine if there had been a cancellation. However, there had also been a recent incident when the parent of an autistic boy was turned away even though she had had a letter. It had been clarified that if a parent was a main carer for someone with a severe learning disability that they should be able to get a vaccination. Cllr Eden said that she would raise it with Cllr Hoskin as part of the health scrutiny function.

Cllr Eden said that the Active Travel Fund was now open, and Helen had sent a link out cycling, walking and public transport were important, but it was also important that people with access needs should have their voices heard. She urged people to have a look.

Cllr Eden then reported that the Cllr for Health and Cllr Eden had raised the issue of the RBH hydrotherapy pool and was supporting the groups wishing to save it and for the CCG to continue funding.

Stu asked about Reading West Station - without disabled access was it discrimination? It had been fed back from another meeting.

Stu also wanted to know if anybody else had had problems with booking appointments for vaccinations - people who had had problems should feed back to the next meeting.

Cllr Eden said that provision and planning for people who have been shielding when all the town's facilities were open again, from a physical and mental health point of view, was very important and should be addressed at a future meeting.

Mary said that she was representing Readibus and presented some statistics; she said that Readibus had been available locally every day during the pandemic, including during the lockdowns. Procedures and cleaning regimes had been put in place from the outset to make travelling as safe as possible. All requests for journeys had been met from March 2020 - over 18,00 - by Reading Council residents for essential purposes such as attending appointments, respite and food shopping. There had been an abundance of feedback stating that people had felt very safe during all the trips, and that the staff had been very helpful. Readibus was a lifeline in Reading particularly during the lockdowns. Mary had been taken to appointments even out of the borough in Wokingham. Cllr Eden said that a vote of thanks should be extended to all involved at Readibus.

Cllr Eden said that local elections were imminent; they were actually last year's elections that had been postponed. There were not just concerns about physical access, but also about safety because of the pandemic. Cllr Eden said that she was planning to get a postal vote this year. If any members of the Working Group had any feedback, they should contact Electoral Services.

Cllr Eden reported about the issue of motorcycles getting into areas where they should not be; one problem was that barriers that stopped motorcycles often stopped wheelchair and scooter users as well. If anyone had any examples of good practice they should let Helen Bryant know, as the Anti-Social Behaviour Team was eager to make sure that those who need to access paths and so on, can, and those who should not were prevented from doing so.

Bob Bristow said that postal votes were not the answer for people who were totally blind and lived alone or were not in a support bubble. Cllr Eden agreed that all should be able to vote safely. All feedback was welcome. Bob also said that finding the entrance to the Katesgrove Polling Station was still difficult, as there was no definite pathway. Cllr Eden said that this should be reported, which Bob had done previously. Cllr Eden said that she should be copied in to any emails.

Cllr Eden asked that an update to the Council Tax Protocol should be brought to the next meeting, as people who were vulnerable needed to be protected when they were in difficulty.

9. DATE OF NEXT MEETING

24 June - it was unclear at the time of the meeting as to if the meeting would be on Teams.

Accessible Information and Communications Policy



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1. Policy Aims and Scope
2. Policy Context
3. Legal framework
4. What do we mean by Accessible Information and Communication?
5. Customer Needs Assessment
6. Our Principles and Standards
7. Principles into Practice

Appendix A Customer Needs analysis

Appendix B Gap analysis of our current practice against best practice

Appendix C Implementation Plan

1. Policy Aims and Scope

The aim of this policy is to have a clear, consistent, transparent and fair approach to the way we communicate and provide information. It reflects best practice in inclusion and accessibility for all and particularly for:

- Disabled people
- People who do not speak or read English at all or very well
- People with low literacy
- People in digital poverty or who don't have access to IT

It covers:

- Internal and external communication
- Written, visual, audio, digital and face to face communication, including social media
- Documents / information (both physical and digital)
- Proactive and re-active communications
- Corporate correspondence
- Meetings
- Online forms and services
- Provision of Interpretation, translation, transcription and communication support
- Planning and design of information and communication channels and materials
- Customer engagement mechanisms

2. Policy Context

This policy supports Reading Borough Council's Customer Experience Strategy 2020-2024 which sets out the Council's commitment to customer service excellence - that every interaction will be a positive experience: better, faster, simpler; and recognises that some people might need extra support to access services, and that we must ensure it is available. It pledges to look at our services and processes through the lens of the customer to ensure services are accessible.

3. Legal framework

This policy also enables us to meet legal requirements in relation to accessible information and communication. These come mainly from 3 areas: The Equality

Act; Web Content Accessibility Guidelines (WCAG) and the NHS Accessible Information Standard

3.1 Equality Act 2010

All the Council's services are required to meet the Equality Act 2010 requirement not to discriminate, and to advance equality of opportunity for protected characteristics: age; disability; gender reassignment; pregnancy and maternity; race; religion or belief; sex; sexual orientation. This may mean:

- removing or minimising disadvantages if it is connected to that characteristic;
- taking steps to meet the needs of people who share a relevant protected characteristic that are different from the needs of people who do not share it;
- encouraging people who share a relevant protected characteristic to participate in public life or in any other activity where their participation disproportionately low.

The Equality Duty explicitly recognises that disabled people's needs may be different from those of people who are not disabled and there is a requirement to make reasonable adjustments.

3.2 Web Content Accessibility Guidelines (WCAG)

The Web Content Accessibility Guidelines (WCAG) are the international standard for producing a universal approach to web content accessibility for the needs of individuals, organisations and governments.

All public sector organisations' websites and mobile applications must meet the international WCAG 2.1 Level AA standard alongside publishing an accessibility statement outlining the extent to which the website is accessible.

The Web Content Accessibility Guidelines aim to ensure that all elements of the digital service are made more 'perceivable, operable, understandable and robust'

3.3 NHS Accessible Information Standard

Under the Care Act (NHS Accessible Information Standard), NHS and Adult Social Care services have a legal responsibility to provide clear access to information. This standard sets out a legal specification that guarantees that information and communications preferences are identified, recorded, flagged, and shared and met for 'patients, service users, carers and parents with a disability, impairment or sensory loss' (NHS, 2020). This standard does not apply to generic services or websites that adult social care users may use.

4. What do we mean by Accessible Information and Communication?

Accessible Information and Communication means using clear, easy to read language and simple, uncluttered design in all communications, and providing appropriate accessible formats and methods so that our communication includes everyone.

We are living in an increasingly digital age which has many benefits for access and inclusion e.g.:

- accessibility features on web sites can read out information to people with visual impairments
- translation apps enable people to translate information into their first language instantly

But we know that many people face obstacles accessing online services e.g.:

- not having the equipment or access to the equipment, to go online.
- not having the skills or ability to use the technology
- not having access to the internet
- anxiety/fear/lack of confidence in using the technology
- accessibility for disabled people
- language and literacy
- not having the assistance and support to go online
- preferring face to face to discuss complex issues.

This means we need to consider how disabled people, people who do not speak or read English at all or very well, people with low literacy and people in digital poverty or who don't have access to IT will be able to receive and understand our information and communicate with us.

5. Customer Needs Assessment

We have carried out a Customer Needs Assessment (Appendix A). We know from our residents' survey¹ that three quarters of residents prefer to receive information about council services via email and just over a half prefer to use the Council's website.

This means a quarter to half of residents prefer to receive information in other ways. Information from voluntary sector services and service users indicate that a variety of methods are needed to cater for different needs: face to face, phone; accessible formats, interpretation and translation and non-digital options.

¹ RBC Residents Survey 2018

In Adult Social Care the largest single needs are for large print and British Sign Language interpretation. It is estimated that 2,205 adults in Reading have severe hearing loss². Our translation and interpretation service had 330 requests for BSL during 2019/20.

Whilst Reading is a very diverse town and has twice the national average of households where no one in the household has English as their main language, just 2% of the Reading population (3,140 people) report that they cannot speak English at all or not well (Census 2011). This is in line with the national average. The main languages of the households with the highest numbers where English is not spoken at all or not well are Polish, Punjabi, Urdu, Nepalese, Bengali and Portuguese. This, along with Arabic and Romanian is reflected in Council's Interpretation and Translation service records.

Being able to find key information easily on the Council's website and to see themselves represented positively in Council communications is also important - for people to trust that the Council has their interests at heart and to feel encouraged to engage with Council messages.

² We used POPPI for prevalence estimates, which are modelled based on estimates in 'Hearing in Adults' (1995) Edited by Adrian Davis.

6. Our Principles and Standards for Accessible Information and

Communications

As a result of our needs assessment and gap analysis (Appendix B) we will adopt the following principles and standards:

- 1) **Full compliance with WCAG 2.1 Level AA standard for web accessibility**
We will pursue full compliance with the WCAG 2.1 Level AA standard for web accessibility and communicate inclusion and accessibility principles and methodology widely across the staff base. This will improve understanding and use of the best practice tools available for accessibility of both online and offline information. This will apply to our own and outsourced communications, third-party communications provided via the Council, to the use of third-party communication vehicles e.g. websites and portals.
- 2) **Work towards full compliance with the NHS Accessible Information Standard across all services**
We will adopt the NHS Accessible Information Standard across all services for customers with disability, impairment or sensory loss. The roll-out of this will be built into our Customer Experience programme.
- 3) **Positive Images**
We will present positive images of disabled people and ethnic diversity on our website and publications to encourage customers to use our services, to help them identify with the message and feel that they can trust the organisation. We will increase our photo library of real residents and service users so that images are more authentic and better represent local context.
- 4) **Involve target audiences to understand what is effective for them**
As part of inclusive communication, we will ask what our customers need to understand the messages that we want to give them and ensure they can let us know how they want to communicate with us.
- 5) **Designated web page for disabled people**
To make it easier for disabled people to access information that is most important to them we will have a designated page, signposted from the Website Home page, with clear information about the services which are the highest priority for them such as accessible toilets, Blue Badges and parking.
- 6) **Telephone hotline to support all areas of the website**
We will provide a Telephone hotline to support all areas of the website where people need assistance to find what they are looking for, complete a transaction, or report a problem with accessibility. This will be promoted on the accessibility pages and staff taking the phone calls will receive

additional training to enable them to deal effectively with the customer enquiry.

7) Design accessibility into information and communication

We will use clear, easy to read language and simple design. We will use Trebuchet or similar (sans serif) font and a minimum font size of 12 point for paper copy.

8) Meet accessible communications needs on request.

We will make provision to be able to meet customers' communications needs on request. In line with our Customer Experience Strategy, customers will be able to receive support by telephone or face to face if they have additional needs and need to speak to an advisor or specialist. We will provide alternative channels for those who need additional support (e.g. face to face appointments). We will make provision for interpretation and translation, alternative formats and multiple channels on request and within a standard timescale.

9) Ensure the additional needs of customers are considered when designing communications

Where there is evidence of need and demand we will provide translated material and accessible formats in advance. We will develop a standard set of principles and criteria for when to make this provision.

10) Interpretation and translation service

We will provide an Interpretation and Translation service. We will provide clear information to customers about how they can ask for interpretation or translation and clear information for staff on standards and how to request a service on behalf of a customer.

11) Staff informed and trained on accessible information and communication

We will provide training and resources for staff on communicating in an inclusive and accessible way. This will be based on the Accessible Information Standard and WCAG 2.1. We will have an accessible information and communication section on our Intranet where staff can access

- Training
- Accessibility guidelines and resources
- Accessible Information Standard and WCAG 2.1
- Interpretation and translation service
- Data and evidence of need and demand for accessible formats and interpretation and translation.

7. Principles into Practice

We have prepared a road map (Appendix C) for putting these principles into practice.

8. References

Customer Experience Strategy - 2020-2024
[Customer care - Reading Borough Council](#)

Equality Act 2010 [Equality Act 2010: guidance - GOV.UK](#)

Web Content Accessibility Guidelines (WCAG) [Understanding accessibility requirements for public sector bodies - GOV.UK](#)

NHS [Accessible Information Standard](#)

Customer Needs Analysis

1. General

We know from our residents' survey³ that three quarters of residents prefer to receive information about council services via email and just over a half prefer to use the Council's website. This reflects is broadly reflected across ethnicity.

In which of the following ways would you most prefer to receive information about council services?						
	Black, Asian And Minority Ethnic	Black, Asian And Minority Ethnic		White	White	
Option	Total	Percent		Total	Percent	
Via the Council website	40	54.79%	2	310	55.66%	2
Via email	57	78.08%	1	404	72.53%	1
Via smartphone applications	11	15.07%	4	49	8.80%	6
Via SMS text message	9	12.33%	5	48	8.62%	7
Via Twitter	1	1.37%	8	17	3.05%	9
Via Facebook	8	10.96%	6	65	11.67%	5
Via your local Councillor (including Councillor surgeries)	13	17.81%	3	131	23.52%	3
Campaigns, workshop sessions and forums	13	17.81%	3	76	13.64%	4
None of these	0	0.00%	9	4	0.72%	10
Other (please write in box below)	6	8.22%	7	45	8.08%	8
Not Answered	0	0.00%	9	4	0.72%	10

³ RBC Residents Survey 2018

2. Disability

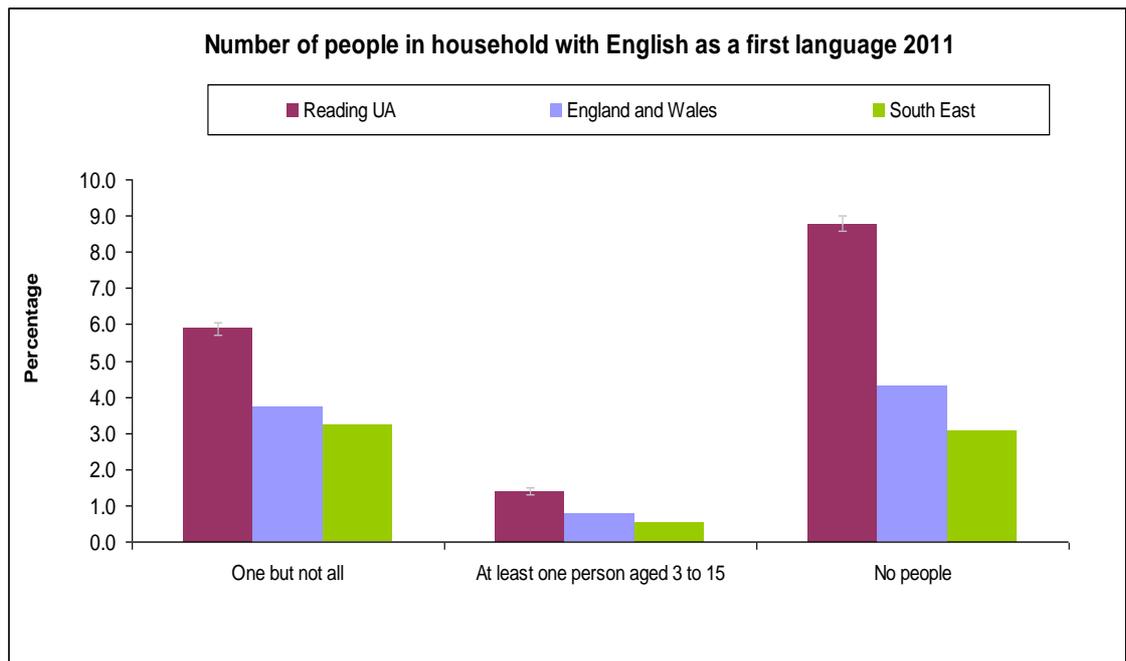
Regarding more specific needs, Adult Social Care record 79 clients in receipt of personal care who have specific communication needs. The largest single needs are for large print and British Sign Language interpretation.

Accessible Information Category	No of People
Communication support	30
Does use hearing aid	13
Requires third party to read out written information	1
Requires visual alert	1
Uses a citizen advocate	3
Uses alternative communication skill	5
Uses communication device	2
Uses personal communication passport	2
Uses sign language	1
Using Makaton sign language	2
Requires communication professional	11
Interpreter needed - British Sign Language	11
Requires specific contact method	4
Requires contact by email	1
Requires contact by letter	1
Requires contact by telephone	2
Requires specific information format	34
Requires information in Easy read	3
Requires information in Makaton	2
Requires information verbally	2
Requires written information in at least 20-point sans serif font	12
Requires written information in at least 24-point sans serif font	15
Grand Total	79

Source: Mosaic (Adult Social Care recording system)

3. Language

The Census 2011 records that around 84% of households in Reading have all members of that household with English as their first language. This is a lower proportion than the national and South East Region averages.



Source: ONS Census 2011

8.8% of households in Reading have no people in the household where English is a main language. This compares with 4.4% nationally.

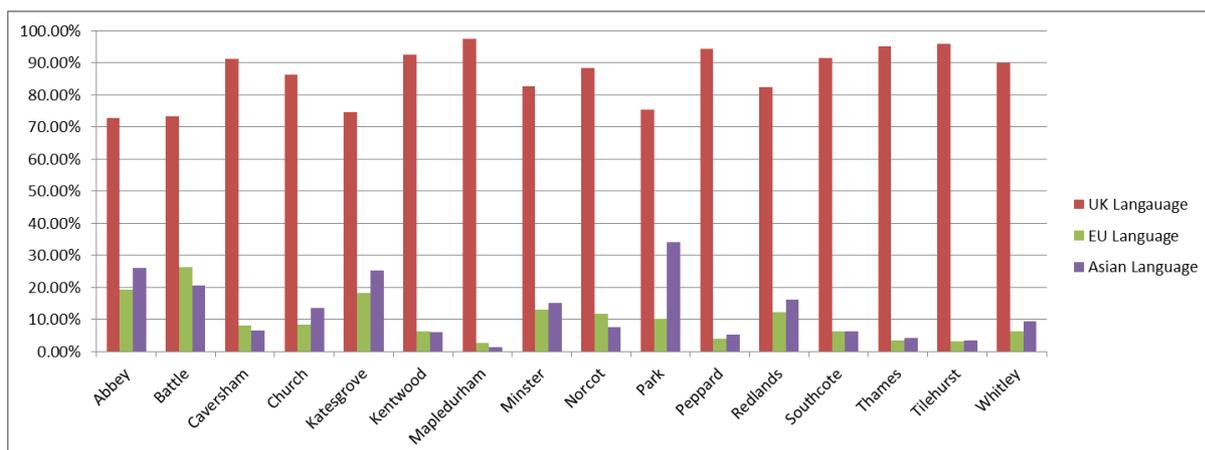
3.1 Languages spoken across Reading

The table below highlights the main languages spoken across Reading.

<i>Main Language</i>	<i>Reading Count</i>
English	126,690
Polish	3,768
Nepalese	2,430
Urdu	1,790
Punjabi	921
Portuguese	655
French	633
Arabic	600

Source: 2011 Census ONS

There are geographical differences as can be seen by the graph below.



Source: 2011 Census ONS

Annual Mother tongue records of Reading pupils show that diversity of pupils' main language is considerably greater than the whole population.

Mother tongue	Primary pupils	Secondary pupils
English	62.9%	67.7%
Urdu	4.4%	3.3%
Polish	3.6%	3.2%
Nepali	2.3%	2.1%
Hindi	1.6%	1.7%
Punjabi	1.5%	1.8%
Tamil	1.5%	1.3%
Arabic	1.4%	1.3%

Source: 2020 School Census, Reading Borough Council

3.2 Need for Interpretation and Translation

The main languages of the highest number of households in Reading where English is not spoken at all or not well are Polish, Punjabi, Urdu, Nepalese, Bengali and Portuguese

Main language	Main language is not English (English or Welsh in Wales): Cannot speak English or cannot speak English well (Census 2011)
Pashto	785
Romanian	823
Latvian	1,066
Persian/Farsi	1,101
Turkish	1,124
Gujarati	1,134

British Sign Language	1,147
Spanish	1,184
Italian	1,250
Hungarian	1,280
Tamil	1,294
Russian	1,688
Arabic	1,755
Cantonese Chinese	1,875
Lithuanian	2,032
Slovak	2,198
Portuguese	2,676
Bengali (with Sylheti and Chatgaya)	3,377
Nepalese	3,454
Urdu	4,292
Punjabi	7,799
Polish	18,349

The Council's Interpretation and Translation service recorded requests for 71 translations and 2530 interpretations during the period April-March 2019/20. The languages in highest demand for translation were Urdu, Nepalese, Polish, Arabic and Romanian; and the languages in highest demand for interpretation were Nepalese, British Sign Language, Polish, Romanian and Arabic. The tables below demonstrate the diversity of languages requested.

<u>No. of Translation request by each Language</u>	
Italian	1
Farsi	1
German	1
English	1
Turkish	1
French	1
Hindi	1
Bengali	2
Albanian	3
Braille	3
Tamil	3
Hungarian	3
Spanish	4
Portuguese	4
Punjabi	5
Romanian	6
Arabic	6
Polish	8

Nepalese	8
Urdu	9
	71

<u>No. of Interpretation request by each language</u>	
Macedonian	1
Gujarati	1
Tetum	1
Uzbek	1
Mirpuri	1
Telugu	1
Indonesian	1
Serbian	2
Latvian	2
Persian	2
Korean	2
Japanese	2
Lithuanian	3
French	4
Kurdish Sorani	4
Czech	4
Russian	7
Slovakian	8
Twi	8
Swahili	8
Farsi	8
Thai	9
Turkish	10
Pashto	11
Hindi	13
Greek	14
Hungarian	17
Somali	18
Albanian	20
Dari	24
Punjabi	27
Vietnamese	27
Bulgarian	28
Cantonese	31
Italian	33
Tamil	35
Mandarin	47
Bengali	57
Spanish	57

Sylheti	64
Portuguese	72
Urdu	97
Arabic	132
Romanian	295
Polish	319
British Sign Language	330
Nepalese	672
	2530

It is estimated that 2,205 adults in Reading have severe hearing loss⁴. Our translation and interpretation service had 330 requests for BSL during 2019/20. The BSL Covid video on the Council's website had the following no of hits:

Month	pageviews	unique pageviews
May	357	312
June	178	153
July	68	60
August	51	43
September	46	38
October	28	20

Adult Social Care records show 11 clients requiring a BSL interpreter but no requests for information in BSL.

3.4 Feedback from Access and Disabilities Working Group

The Council's Access and Disabilities Working Group campaigns for improved access for disabled people and acts as a pressure group in identifying and promoting public awareness of problems of access - primarily the physical barriers and exclusions imposed on people by poor design of buildings and places within the Borough. It also monitors and reviews the role of the Council as an employer and as a provider of services. It has given feedback to the Council, over the years on accessible information and communication. Its most recent feedback is:

- **Council's website**
 - Home page should have a designated page for disabled people; the key content being clear information about accessible toilets and Blue Badges and parking
 - Be accessible for screen readers
 - Present positive images of disabled people
- In response, the new website will include positive images of disabled people. There will be a designated page for disabled people providing easy

⁴ We used POPPI for prevalence estimates, which are modelled based on estimates in 'Hearing in Adults' (1995) Edited by Adrian Davis.

access to information such as toilets and parking, including a map of parking bay locations.

- **Polling Stations**
- Ballot paper available in large print
- Offer appropriate magnification magnifier
- Offer a template

3.5 Feedback from Voluntary Sector Partners

We asked our voluntary sector partners for feedback on the needs their service users presented to them and what their experience was of the best methods for communicating with their service users.⁵

We received feedback from 32 voluntary sector partners serving a range of target service users, but the largest group was disabled people.

The feedback was clear that a variety of methods were needed to cater for different needs. A number commented that face to face communication was preferred and the phone was often the best alternative option for people; and that those with only a mobile could receive a text or WhatsApp.

‘A mixture:

Telephone (primary source of introduction - often to the family member/carer)

Video calling after introduction and according to individual circumstance (What’s App, Teams, Zoom, Skype)

Email as appropriate

Old fashioned postal mail (people do like detailed information in hard copy format to enable ongoing read throughs- this applies even to those who use email. It should be noted that when people indicate they have an email address we do check that they use it - often they don’t monitor it)

Group meetings - these have been set up during the pandemic and have been appreciated by several service users- we tend to use Zoom’

‘We have to be flexible. We need to meet with some; we need to phone some; we need to send text in different fonts to some; we need to send text highlighted colours for some; we need to send messages in short sentences to some. Some people need reminders. And so on.’

‘A phone call is a good way but overall, we find that face to face is by far the best way to communicate and more important confirmation of their understanding.

Some people can say yes (to please) but do not fully understand what has been written. Support to explain the information and consequences of their decisions if they make any.

⁵ Information from the Voluntary and Community Sector on Digital inclusion and Communication preferences of service users, Policy Team, Reading Borough Council, December 2020

Easy read documents are a good start- but again these need to be discussed so that systems/guidelines/information can be put into perspective and use examples of situations that people can learn from.'

'We usually phone our learners as this is the best method and we have set up smaller whats app class groups. Many learners don't have email accounts, so cannot respond to emails. We have a ... facebook page but not everyone connects to this. We send messages to them over mobile phones or their telephone (landline)'

'Whatsapp tends to be the best, as well as text message or phone call ... Zoom and other conferencing methods tend to be more difficult.'

The main specific needs reported were provisions of accessible formats to meet the diverse needs of disabled people, provision of interpretation and translation and non-digital options for communication.

'Very easy words - avoid jargon and big sentences
Big print - not enormous just over 14- 16 font size
Showing and explaining Easy Read documents with pictures or symbols'

'basic plain English and no jargon'

It was also pointed out the use of different platforms for video meetings was difficult for service users.

'Ease of use, consistency, e.g. some organisations use Zoom, others use Teams, others use Skype, others use Google Meet; organisations use different social media platforms - website, Facebook, Instagram, Twitter. If an individual has contact with multiple organisations, they may need to use a range of platforms.'

Gap Analysis and Recommended Action

Recommended Best Practise	Current RBC Practice	Action Required
<p>1. Full compliance with WCAG 2.1 Level AA standard for web accessibility</p> <p>We should pursue full compliance with Level AA and communicate the inclusion and accessibility principles and methodology widely across the staff base to improve understanding and use of the best practice tools available which will improve the accessibility of both online and offline information. This should apply both to our own and outsourced communications, third-party communications provided via the Council, and to the use of third-party communication vehicles e.g. websites and portals.</p>	<p>Currently the Reading Borough Council website conforms partially with baseline Level AA tier of the WCAG 2.1. Areas of the website which lack AAA status include outdated PDF documents that do not meet accessibility standards, non-compliant downloadable documents, videos without BSL interpretation, captions or transcripts, and tables that have not been provided with titles, column or row headings. Awareness of what is required is low.</p> <p>Use of third-party websites and portals is common as is distribution of third-party communications. These are not necessarily compliant with WCAG 2.1 Level AA</p>	<p>Provide non-technical summary of the WCAG 2.1 Guidelines on an accessible information and communication Intranet page to improve understanding and assist compliance.</p> <p>Incorporate into training package.</p> <p>Develop a comprehensive template for accessible on-line and off-line communications, both internal and external.</p> <p>Use of third-party websites and portals to be subject to approval by the Web Team for compliance with WCAG 2.1 Level AA</p> <p>Distribution of third-party communications to be subject to approval by the Communications Team for compliance with the accessibility template.</p>
<p>2. Work towards full compliance with the NHS Accessible Information Standard across all services</p>	<p>There are only 79 records on MOSAIC which indicates that identification and recording may not be comprehensively undertaken.</p>	<p>Audit and review compliance with standard in Adult Social Care and implement any improvements required.</p> <p>Use lessons learned to support other services to comply with the standard</p>

<p>The NHS Accessible Information Standard applies to adult social care services to guarantee that information and communications preferences are identified, recorded, flagged, and shared in order to meet the needs of patients, service users, carers and parents with a disability, impairment or sensory loss. It does not apply to generic services. It is recommended that the standard is adopted across all services for disabled customers with impairment or sensory loss and roll-out built into the Customer Experience programme going forward.</p>		<p>build into future specifications of customer relationship management systems</p>
<p>3. Positive Images Positive images of disabled people and ethnic diversity on our website and publications to encourage people that they are welcome to use services, to identify with the message and feel that they can trust the organisation.</p>	<p>The Communications team uses a diverse range of images in communications where possible (social media, print). These are often sourced from library images.</p>	<p>Increase images of real residents and service users in our photo library so images are more authentic and better represent local context.</p>
<p>4. Involving target audiences to understand what is effective for them</p>	<p>As part of its compliance with the NHS Accessible Information Standard DACHS ask and record communication preferences of their clients.</p>	<p>Information on what we know about target audience communication preferences to be available on Accessible information and communication Intranet page.</p>

	<p>There are many good examples of involving target audiences e.g. Older People's Working group, Physical Disability and Sensory Needs working group, Access and Disabilities Working Group, Covid Public Health, Neighbourhood Team, Playgrounds team in DEGNS.</p> <p>Our website has been tested by people with a wide range of disabilities and is accredited by the Shaw Trust.</p> <p>This information is not consistently available for staff to access.</p>	Build awareness into Customer Experience Culture Shift programme.
<p>5. Designated web page for disabled people To make it easier for disabled people to access information that is most important to them we have a designated page, signposted from the Website Home page, with clear information about the service's highest priority for them such as accessible toilets, Blue badges and parking.</p>	<p>The Reading Services Guide is available and promoted as the online service guide for Adult Care and Children's Services users. It provides a comprehensive directory of statutory and voluntary and community services for Reading residents, for which a key target audience is disabled people. The website is due for review.</p>	Explore the options as part of the review of the Reading Services Guide
<p>6. Telephone hotline to support all areas of the website Provision of a Telephone hotline to support all areas of the website where people need assistance to find</p>	Not provided currently	Set up a hotline and ensure that staff that pick up this line are specifically trained to deal with these enquiries. This number could be used to provide targeted support.

<p>what they are looking for, complete a transaction, report a problem with accessibility</p>		
<p>7. Design accessibility into information and communication All communication to use clear, easy to read understandable, inclusive language and simple, uncluttered design. Use of Trebuchet (sans serif) font and a minimum font size of 12 point for paper copy</p>	<p>A web content Style guide for staff is provided at https://intranet.reading.gov.uk/manual/intranet-guide/accessible-content, providing a link to a very detailed GOV.UK guide It specifies sans serif font</p>	<p>Develop a comprehensive template for accessible on-line and off-line communications, both internal and external.</p> <p>Raise awareness through link on Accessible information and communication Intranet page.</p> <p>Include in training</p>
<p>8. Provision to meet needs on request</p>	<p>Our Customer Experience Strategy commits to providing consistent customer experience across all channels across the Council and to providing services that are accessible for all and sets out that whilst the majority of customers will be encouraged to access services online, we will provide alternative channels for those who need additional support (e.g. telephone or face to face if they are vulnerable and need to speak to an advisor or specialist). We provide a comprehensive Interpretation and Translation Service.</p>	<p>Raise awareness through link on Accessible information and communication Intranet page.</p> <p>Include in training</p>
<p>9. Provision to meet need identified in the design process</p>	<p>Staff are required to undertake Equality Impact Assessments which will include consideration of how information will be communicated, and</p>	<p>Develop a standard set of principles and criteria, based on data and evidence of need and demand, for when and where we provide translations.</p>

	<p>decisions are made on a project by project basis which may lead to inconsistency in our offer.</p>	
<p>10. Interpretation and translation We will meet our Equality and Care Act duties by providing an Interpretation and Translation (I&T) service. We will provide clear information to customers about how they can ask for interpretation or translation and clear information for staff on standards and how to request a service on behalf of a customer.</p>	<p>We make provision to meet our Equality and Care Act duties by having an Interpretation and Translation (I&T) Team which procures services through a framework on behalf of Council services who then have SLAs or Pay as you go with I&T. Services respond to individual needs or requests from residents who need to understand information in their preferred form of communication, by booking a translation or interpretation from I&T. Where information is high priority such as the Covid guidelines and support, and/or needs communicating to a specific audience additional provision may be made. Not all staff may be aware that it is available or what is offered.</p> <p>There is currently no clear criterion or threshold for when general communications material should be provided in translations or other formats. (See 9 above)</p> <p>Website provides translation of webpages into other languages. We have a feedback link on</p>	<p>Information on the service included on accessible information and communication Intranet page providing information on what services are available, how to access languages most requested</p> <p>Add a specific 'accessibility' option in the form where customers can ask for alternative format or suggest accessibility improvements.</p>

	every page on the website (tab on the right of the page - also accessible to assistive tech)	
<p>11. Staff informed and trained on accessible information and communication</p> <p>We will provide training and resources for staff on communicating in an inclusive and accessible way. This will be based on the Accessible Information Standard and WCAG 2.1</p> <p>We will establish accessible information and communication section on our Intranet where staff can access</p> <ul style="list-style-type: none"> • Training • Accessibility guidelines and resources • Accessible Information Standard and WCAG 2.1 • Interpretation and translation service 	<p>We have a Communicate Information section on the Intranet</p> <p>https://intranet.reading.gov.uk/section/how-do-i/communicate-information where staff can find: a checklist on information on website accessibility, how to book interpretation and interpretation, style guides, how to make consultations accessible. There is no clear training offer or awareness programme.</p>	<p>Design and deliver training programme</p> <p>Establish accessible information and communication section on Intranet inc links to:</p> <p>Training</p> <p>Accessibility guidelines and resources</p> <p>Accessible Information Standard and WCAG 2.1</p> <p>Interpretation and translation service</p>

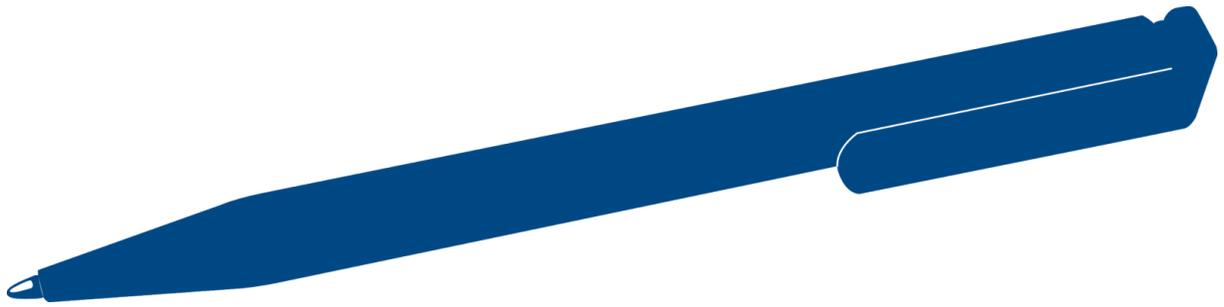
Accessible Information and Communication Implementation Plan

Task	Detail	Timescale
Accessible information and communication Intranet page	Content: <ul style="list-style-type: none"> • non-technical summary of the WCAG 2.1 • NHS Accessible Information Standard • information on target audience communication preferences • Accessible information and comms guide • web content Style guide • Interpretation and translation service details and guidance • Languages most requested • Customer Experience Strategy • Training package • Communication of the page to staff • Links from Customer Experience pages 	December 21
Comprehensive template for accessible on-line and off-line communications, both internal and external	<ul style="list-style-type: none"> • Scoping of documentation • Design of template • Communication plan 	December 21
Training package	<ul style="list-style-type: none"> • WCAG 2.1 • NHS Accessible Information Standard • Inclusive communication Built into Customer Experience Culture Shift/Team Reading programme	December 21 December 21 TBA

Task	Detail	Timescale
Adoption of NHS Accessible Information Standard across all services	<ul style="list-style-type: none"> • Audit and review compliance with standard in Adult Social Care • Improvement plan • Whole council roll out plan 	September - December 21 link to Amio Futures Gov Digital accelerator project on MOSAIC
Provision to meet need identified in the design process	Develop a standard set of principles and criteria, based on data and evidence of need and demand, for when and where we provide translations.	December 21
Positive Images	Increase images of real residents and service users in our photo library so images are more authentic and better represent local context.	October 21
Designated web page for disabled people	Explore the options as part of the review of the Reading Services Guide	TBA
Telephone hotline to support all areas of the website	Build into Customer Experience Programme work on the website	TBA
'accessibility' option on webpages for customers to ask for alternative format or suggest accessibility improvements.	Build into Customer Experience Programme work on the website	TBA

Council Tax Protocol

Revised Collection of Council Tax Arrears Good Practice Protocol



Agreed by:

Citizens Advice, June 2017

Local Government Association, June 2017



Council Tax Protocol

We agree to adopt this protocol in
as our public commitment to its principles of fairness, partnership
working and transparency in local authority debt collection:

Signature

.....

Local authority representative

Signature

.....

Local Citizens Advice / advice
agency representative

Signature

.....

Enforcement agency
representative

*(where relevant)*¹

Signature

.....

External contractor
representative

*(where relevant)*¹

Date:

¹ Enforcement agents and external contactors may sign this protocol if they and the authority agree that it is appropriate.

Council Tax Protocol

Revised collection of council tax arrears good practice protocol

Council tax payers receive a better level of service when local authorities², enforcement agencies and debt advice agencies work closely together. Early intervention and proactive contact with people struggling with bill payments can help prevent them incurring further charges and help alleviate stress. It can also potentially help reduce both collection costs and calls on local public services, particularly mental health services.

This good practice protocol makes a number of suggestions on how local partnerships can be strengthened and residents better supported. Developed through partnership work between the national bodies representing advice agencies, local government and enforcement agencies throughout England and Wales, it builds upon the previous protocol, which government recommended local authorities adopt in their 2013 guidance. The protocol reflects best practice at local level and is intended to facilitate regular liaison on practices and policy concerning council tax debt collection. In setting down clear procedures and keeping them regularly under review, all parties can ensure that cases of arrears are dealt with appropriately whilst complaints are handled efficiently.

By signing the protocol and adopting the practices set out below, local authorities, enforcement agencies and advice agencies can help taxpayers pay their council tax bills while accessing debt advice when needed.

² Where we use the term 'local authorities', this should also be read to cover a local authority's external contractors, where the local authority has contracted out the administration of some or all of its council tax collection process.

Partnership

To foster more effective partnership working:

1. Local authorities, enforcement agencies and advice agencies should meet regularly to discuss practical and policy issues with a recommendation to meet quarterly at officer level and annually with elected members.
2. All parties should have dedicated contacts accessible on direct lines and electronically so that issues can be taken up quickly.
3. All parties should promote mutual understanding by providing training workshops, undertaking exchange visits and sharing good practice.
4. As local authorities are responsible for the overall collections process, they should ensure all their staff, external contractors and enforcement agencies receive the appropriate training, particularly on vulnerability and hardship.
5. Advice agencies, enforcement agencies and local authorities should work together to develop a fair collection and enforcement policy, highlighting examples of vulnerable people or those who find themselves in vulnerable situations, and specifying clear procedures in dealing with them. Contractual arrangements with enforcement agents should specify procedures for the local authority to take back cases involving vulnerable people.
6. Local authorities should consider informal complaints as debtors may be afraid to complain formally where enforcement agent activity is ongoing. Informal complaints received from advice agencies can indicate problems worthy of further investigation both locally by the local authority and by referral to national bodies.

Information

To improve the information supplied to council tax payers about the billing process, how to get support and debt advice and to promote engagement:

1. All parties should work together to produce letters that clearly and consistently explain how council tax bills have been calculated (including any Council Tax Support award). Council tax bills should make clear council tax is a priority debt and explain the consequences of not making payment by the date specified. As far as possible within the constraints of systems, where a taxpayer has council tax arrears, the letters should explain how the debt has been accumulated and over which time period, the layout and language of bills and letters should be easy to understand, with any letters including a contact phone number and email address. All information should also be made available online in a clear format.
2. Local authorities should consider reviewing payment arrangements and offer more flexible options, including, subject to practicality, different payment dates within the month, spreading payments over 12 months and, potentially, different payment amounts to assist those on fluctuating incomes. This can allow people to budget more effectively.
3. Local authorities and enforcement agents should publicise local and national debt advice contact details on literature and notices. Advice agencies can help by promoting the need for debtors to contact their local authority promptly in order to agree payment plans. Parties can work together to ensure the tone of letters is not intimidating but encouraging of engagement.
4. Local authorities should ensure that enforcement agencies have appropriate information about the council tax debts they are recovering, so they can put this in letters they send to debtors and answer any questions.
5. Local authorities should consider providing literature about concerns council tax debtors may have about enforcement agents and enforcement. Information could cover charges enforcement agencies are allowed to make by law, how to complain about enforcement agent behaviour or check enforcement agent certification and further help available from the local authority or advice agencies.
6. All parties should work together to review and promote better engagement by council taxpayers. This should include information on how bills can be reduced through reliefs, exemptions and council tax support schemes, advising taxpayers that they should contact the local authority if they experience financial hardship and the consequences of allowing priority debts to accumulate. Information and budgeting tools should be made available on local authority and advice agency websites, via social media and at offices of relevant agencies. This is an opportunity for joint campaign work.

Recovery

If a council tax bill is not paid, then the local authority's recovery process comes into play. While local authorities strive to make early contact with a debtor, the first point of engagement by a debtor often only occurs when an enforcement agent visits the premises. Greater effort should be made at or before the Tribunal Courts and Enforcement Act's compliance stage, including debt and money advice referrals and to assess whether vulnerability or hardship applies, so as to avoid escalating a debt. Therefore:

1. Local authorities and enforcement agencies should work in partnership with advice agencies on the content, language and layout of all documents, produced by the local authority and agents acting on its behalf which are part of the enforcement process. This should aim to ensure that the rights and responsibilities of all parties, particularly those of the debtor, are clearly set out.
2. Enforcement agents should provide the debtor with a contact number and email address should they wish to speak to the local authority.
3. Local authorities should keep all charges associated with recovery under regular review to ensure they are reasonable and as clear and transparent as possible and reflect actual costs incurred. Enforcement agents should only make charges in accordance with council tax collection and enforcement regulations, particularly the Tribunal Courts and Enforcement Act.
4. Local authorities should periodically review their corporate policy on debt and recovery, particularly what level of debt (inclusive of liability order fees) should have accrued before enforcement agent action, as enforcement will add additional costs to a debt.
5. As part of their corporate policy on debt and recovery, local authorities should have a process for dealing with cases that are identified as vulnerable, bearing in mind that different local authorities may have different definitions of a vulnerable person or household. Any local definition of vulnerability should be developed in consultation with advice agencies and enforcement agencies and, wherever possible, the local authority should aim to publish clear guidelines on what constitutes vulnerability locally. Where a local authority's vulnerability criteria apply, In these cases, debts should be considered carefully before being passed to enforcement agencies. Where enforcement agents or other parties identify a vulnerable household, recovery action will be referred to the local authority.
6. Local authorities should regularly review and publish their policies which cover hardship, including how these relate to council tax arrears.

7. Where a household is in receipt of Council Tax Support, the local authority should consider matters carefully and determine whether to pass such cases to enforcement agents, based on the individual circumstances of the case.
8. The debtor may have outstanding claims for Universal Credit, Council Tax Support or other benefit(s) which are contributing to their arrears. Local authorities can suspend recovery once it is established that a legitimate and relevant claim is pending.
9. Local authorities and their enforcement agents should consider offering a 28 days hold or “breathing space” on enforcement action if debtors are seeking debt advice from an accredited advice provider.
10. Procedures should exist for debt advisers to negotiate payments on behalf of the taxpayer at any point in the process, including when the debt has been passed to the enforcement agent. In some cases, the debtor may only contact an advice agency following a visit from the enforcement agent.
11. Local authorities and enforcement agents should consider accepting and using the Standard Financial Statement (SFS) or Common Financial Statement in assessing ability to pay as long as this is consistent with securing value for money for all council tax payers.
12. Each case should be examined on its merits and repayment arrangements need to be affordable and sustainable, while ensuring that the debt is paid off within a reasonable period. Where appropriate, local authorities should provide the flexibility to spread repayments over more than a year, including beyond the end of a financial year.
13. Local authorities should prioritise direct deduction from benefits or attachment of earnings in preference to using enforcement agents. This avoids extra debts being incurred by people who may already have substantial liabilities.
14. Clarity should be provided to the debtor and enforcement agency as to which debts are being paid off, in what amounts and when, especially where a debtor has multiple liability orders. Where appropriate, debts should be consolidated before being sent to enforcement agents.
15. Local authorities should publish a clear procedure for people to report complaints about all stages of recovery action. Local authorities will regularly monitor and, subject to requirements of commercial confidentiality and the Data Protection Act, publish the performance (including complaints) of those recovering debts on their behalf and ensure that contractual and legal arrangements are met.

Free, confidential advice. Whoever you are.

We help people overcome their problems and campaign on big issues when their voices need to be heard.

We value diversity, champion equality, and challenge discrimination and harassment.

We're here for everyone.



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