

READING BOROUGH COUNCIL

REPORT BY DEPUTY CHIEF EXECUTIVE

TO:	POLICY COMMITTEE		
DATE:	23 SEPTEMBER 2021		
TITLE:	ACCESSIBLE INFORMATION AND COMMUNICATIONS POLICY		
LEAD COUNCILLOR:	CLLR MCEWAN	PORTFOLIO:	CORPORATE AND CONSUMER SERVICES
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1. PURPOSE OF REPORT AND EXECUTIVE SUMMARY

1.1 This report presents a draft Accessible Information and Communications Policy to support the Customer Experience Strategy going forward.

1.2 The Policy adopts the best practice set out in the Web Content Accessibility Guidelines 2.1 Level AA and seeks to work towards full compliance with the NHS Accessible Information Standard across all services.

1.3 The Policy is provided at Appendix 1 of the report and a high-level implementation Plan is set out in Appendix 3

1.4 Appendices:

1.4.1 Appendix 1 - Accessible Information and Communications Policy

1.4.2 Appendix 2 - Equality Impact Assessment

1.4.3 Appendix 3 - Implementation Plan

2. RECOMMENDED ACTION

2.1 That the draft Accessible Information and Communications Policy attached at Appendix 1 is approved.

3. POLICY CONTEXT

3.1 This policy supports implementation of Reading Borough Council's Customer Experience Strategy 2020-2024, approved by Policy Committee in January 2020. The Strategy covers all of RBC's services including both internal and external communication and reflects the Council's commitment to equality and customer service excellence by presenting excellent practice. It makes a commitment that every interaction will be a positive experience: better, faster, simpler. It recognises that some people might need extra support to access services, and 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.

4. THE PROPOSAL

4.1 Current Position

4.1.1 An Accessibility workstream was formed as part of the delivery of the Customer Experience Strategy. A key component was the development of an Accessible Information and Communications Policy. This was to provide a clear, consistent, and fair approach to the way we communicate and provide information particularly considering:

- People who are disabled
- 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

4.1.2 This applies to both residents and staff and applies to all types of communication.

4.1.3 As part of the development of the Policy, a Customer Needs Analysis (Appendix A of the Policy) and a best practice review was undertaken. This established that there is a considerable legal framework of best practice in relation to accessible and inclusive information. This stems from the Equality Act 2010 and is further set out in the Web Content Accessibility Guidelines (WCAG) - an international standard for producing a universal approach to web content accessibility - and the NHS Accessible Information Standard.

4.1.4 A gap analysis of the Council's current practice against best practice was undertaken. This is set out in Appendix B of the Policy and provides direction for the implementation plan set out in Appendix 3 of this report. The gap analysis identified many areas of best practice already in place including:

- the Council's provision of a comprehensive Interpretation and Translation Service
- involvement of target audiences through Older People's Working group, Physical Disability and Sensory Needs working group, Access and Disabilities Working Group, Covid Public Health work, and through the Neighbourhood team, and Playgrounds team in DEGNS
- testing of the Council's website by people with a wide range of disabilities, and accreditation of the website from the Shaw Trust.
- the online [Reading Services Guide](#) for Adult Care and Children's Services users which provides a comprehensive directory of statutory and voluntary and community services for Reading residents
- a 'Communicate Information' section on the Council's intranet with a checklist on information on website accessibility, how to book interpretation and interpretation, style guides, how to make consultations accessible.

4.1.5 It noted that currently the Reading Borough Council website is partially conformant with baseline Level AA tier of the WCAG 2.1. The website Accessibility Statement identifies that some PDF documents, downloadable documents, videos and tables do not meet accessibility standards and general staff awareness of what is required and how to meet this is low. 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.

4.1.6 The gap analysis highlighted that consistency of practice could be improved by rolling out, across all services, the best practice from the NHS Accessible Information Standard being applied in Adult Social Care, and the Web Content Accessibility Guidelines; and promoting best practice through improved staff awareness and training on accessibility.

4.2 Proposal

4.2.1 The Policy proposes 10 Principles and Standards:

1. **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 apply 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.
2. **Work towards full compliance with 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. **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.
4. **Involve target audiences** through needs analysis and co-production where appropriate to understand what communication methods are effective for them
5. **Create a designated web page for disabled people** to make it easier for disabled people to access information that is most important and relevant to them.
6. **Telephone hotline to support all areas of the website** where people need assistance to find what they are looking for, complete a transaction, report a problem with accessibility. This number will be promoted on the accessibility web pages above and will be answered by staff with additional training about accessibility.
7. **Design accessibility into information and communication** using clear, easy to read language and simple design.
8. **Meet accessible communications needs on request** for those who need additional support e.g. via telephone or face to face appointments, interpretation and translation, alternative formats and multiple channels on request, within a standard timescale, with clear information to customers and staff on standards and how to make a request.
9. **Ensure the additional needs of customers are considered when designing communications** and that it is based on data and evidence of need and demand
10. **Staff are informed and trained** on accessible information and communication.

4.3 Implementation

- 4.3.1 The high-level implementation plan is set out in Appendix 3. Rolling out the best practice from the NHS Accessible Information Standard across all services will need to take place in stages. An audit and review compliance with the NHS Accessible Information Standard is currently underway in Adult Social Care and will be completed by December. This will provide learning for the approach to whole Council adoption of the standard, in particular in relation to recording service user communication preferences; and staff training and guidance.
- 4.3.2 Improvements to accessibility of the website will be incorporated into the Customer Experience Programme work on the website.

5. CONTRIBUTION TO STRATEGIC AIMS

5.1 The proposals support and underpin how we deliver against all Corporate Plan priorities:

Healthy Environment
Thriving Community
Inclusive Economy

5.2 The decision contributes to the Council's strategic aims to promote equality, social inclusion.

6. ENVIRONMENTAL AND CLIMATE IMPLICATIONS

6.1 This policy is assessed as Net Nil impact. Provision of information or enabling communication through hardcopy written format is necessary for some people to be able to access services and the information the Council provides. The impact will be minimised by providing hardcopy written format on request and using data and evidence of need and demand to inform decisions about when to provide this format in advance.

7. COMMUNITY ENGAGEMENT AND INFORMATION

7.1 Section 138 of the Local Government and Public Involvement in Health Act 2007 places a duty on local authorities to involve local representatives when carrying out "any of its functions" by providing information, consulting or "involving in another way".

6.2 Appendix A: Customer Needs analysis includes feedback from service users and voluntary and community sector providers that has informed the development of the Policy.

6.3 Voluntary and community groups and service user forums have also had the opportunity to comment on the Draft Policy. They have generally welcomed the Policy and have expressed desire to be involved as implementation takes place.

6.4 Service user involvement will take place at key stages during implementation. For example, the audit and review of compliance with the NHS Accessible Information Standard is currently underway in Adult Social Care and involves seeking service user feedback on their experience of communication with Adult Social Care. The audit will be used to improve the accessibility of communication in Adult Social Care and the learning will inform best practice across the Council.

8. EQUALITY IMPACT ASSESSMENT

8.1 An Equality Impact Assessment (EIA) is relevant to the decision and is provided at Appendix 2. No negative impact is identified. There will be general benefits from clearer, easier to read language and simple design in communications. Disabled people will benefit from better compliance with accessibility principles and methodology. Disabled people and people who do not speak or read English at all or very well will benefit from a more consistent access to and provision of interpretation and translation. Staff will benefit from improved training and awareness of accessibility principles and methodology.

9. LEGAL IMPLICATIONS

9.1 This Policy supports meeting our legal requirements set out in:

9.1.1 Equality Act 2010 to not 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.
- to make reasonable adjustments to meet disabled people's needs

9.1.2 Web Content Accessibility Guidelines (WCAG)

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.

9.1.3 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 in order to meet the needs of 'patients, service users, carers and parents with a disability, impairment or sensory loss' (NHS, 2020).

10. FINANCIAL IMPLICATIONS

10.1 The Principles and Standards of this Policy will be incorporated into the Customer Experience programme and will be included within existing budgets.

11. BACKGROUND PAPERS

11.1 Mosaic (Adult Social Care recording system)

11.2 2020 School Census, Reading Borough Council

11.3 RBC Interpretation and Translation service records

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