

# Equality Impact Assessment (EIA)

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Name of proposal/activity/policy to be assessed: Accessible Information and Communications Policy

Directorate: Resources

Service: Corporate Improvement and Customer Services

Name: Clare Muir

Job Title: Policy and Voluntary Sector Manager

Date of assessment: 10/05/21

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## Version History

Version	Reason	Author	Date	Approved By
1	Initial	Clare Muir	10/05/21	
2	Update	Clare Muir	20/08/21	
3	Update	Clare Muir	01/09/21	
4	Update	Clare Muir	13/09/21	

## Scope your proposal

### 1. What is the aim of your policy or new service/what changes are you proposing?

Aim: to provide a clear, consistent, and fair approach to the way the Council communicates and provides 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

Proposed changes: 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, 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** to understand what communication methods are effective for them
5. **Designated web page for disabled people** to make it easier for disabled people to access information that is most important 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 is based on data and evidence of need and demand.
10. **Staff are informed and trained** on accessible information and communication.

## 2. Who will benefit from this proposal and how?

Everyone will benefit from clearer, easier to read language and simple design in communications and

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.

## 3. What outcomes does the change aim to achieve and for whom?

Ability to meet our legal requirements set out in the Equality Act 2010; to meet the Web Content Accessibility Guidelines (WCAG) 2.1 Level AA standard; and NHS Accessible Information Standard

## 4. Who are the main stakeholders and what do they want?

Council service users particularly disabled users and users who do not speak or read English at all or very well.

The Council wants to provide information and get essential messages out to residents.

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

## Assess whether an EqlA is Relevant

How does your proposal relate to eliminating discrimination; advancing equality of opportunity; promoting good community relations?

It relates to eliminating discrimination and advancing equality of opportunity by designing accessibility into information and communication using clear, easy to read language and simple design and making reasonable adjustments to meet the needs of disabled service users; and providing interpretation and translation services for people who may be excluded because they belong to a protected group that does not speak English.

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**Do you have evidence or reason to believe that some (racial, disability, sex, gender, sexuality, age and religious belief) groups may be affected differently than others? Make reference to the known demographic profile of the service user group, your monitoring information, research, national data/reports etc.**

Yes - the Policy report provides a customer needs assessment. We know from our residents' survey<sup>1</sup> 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.

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 loss<sup>2</sup>. 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.

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<sup>1</sup> RBC Residents Survey 2018

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

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- **Is there already public concern about potentially discriminatory practices/impact or could there be? Make reference to your complaints, consultation, feedback, media reports locally/nationally.**

Accessible communication and information is sometime raised as a concern through user forums and complaints.

If the answer is **Yes** to any of the above, you need to do an Equality Impact Assessment.

If **No** you **MUST** complete this statement.

**An Equality Impact Assessment is not relevant because:**

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X

Completing Officer

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X

Lead Officer

# Assess the Impact of the Proposal

## Consultation

How have you consulted with or do you plan to consult with relevant groups and experts.

The Customer Needs analysis includes feedback from service users and voluntary and community sector providers that has informed the development of the policy.

The draft policy has been shared for feedback with voluntary and community groups and service user forums.

Service user involvement will take place 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.

Relevant groups/experts	How were/will the views of these groups be obtained	Date when contacted
Access and Disabilities Working Group Loneliness and Isolation Steering Group Older peoples working group Carers Forum	Attended meetings and invited feedback on proposals	March - Sept 2021
Voluntary and Community sector - organisations with expertise on specific disabilities and those organisations that had previously provided feedback during the customer needs analysis phase	Shared draft policy and invited feedback	July 2021

<p>Adult Social Care service users</p>	<p>Sample of users being surveyed as part of audit and review of compliance with the NHS Accessible Information Standard</p>	<p>August - October 2021</p>
<p>Shaw Trust</p>	<p>test out website</p>	<p>As projects develop</p>
<p>Staff and Unions</p>	<p>invite feedback</p>	<p>As projects develop</p>

## Collect and Assess your Data

Using information from Census, residents survey data, service monitoring data, satisfaction or complaints, feedback, consultation, research, your knowledge and the knowledge of people in your team, staff groups etc. describe how the proposal could impact on each group. Include both positive and negative impacts.

(Please delete relevant ticks)

- Describe how this proposal could impact on racial groups
- Is there a negative impact? No

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.

The policy makes provision to to meet customers communications needs on request, through alternative channels for those who need additional support (e.g. face to face appointments) and provision for interpretation and translation within a standard timescale.

We will develop a standard set of principles and criteria for when and where we provide translated material and accessible formats in advance. This will be based on data and evidence of need and demand.

We will provide an Interpretation and Translation service with 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.

- Describe how this proposal could impact on Sex and Gender identity (include pregnancy and maternity, marriage, gender re-assignment)
- Is there a negative impact? No

- Describe how this proposal could impact on Disability
- Is there a negative impact? No

The policy is driven by best practice in accessible communication for disabled people. It sets out that we will provide alternative channels for those who need additional support. We will make provision for BSL interpretation and for people with visually impairments on request and within a standard timescale.



We will develop a standard set of principles and criteria for when and where we provide translated material and accessible formats in advance. This will be based on data and evidence of need and demand.

- Describe how this proposal could impact on Sexual orientation (cover civil partnership)
- Is there a negative impact? No
  
- Describe how this proposal could impact on age
- Is there a negative impact? No
  
- Describe how this proposal could impact on Religious belief
- Is there a negative impact? No

## Make a Decision

If the impact is negative then you must consider whether you can legally justify it. If not you must set out how you will reduce or eliminate the impact. If you are not sure what the impact will be you MUST assume that there could be a negative impact. You may have to do further consultation or test out your proposal and monitor the impact before full implementation.

### No negative impact identified

#### 1. How will you monitor for adverse impact in the future?

We are in ongoing dialogue with the voluntary and community sector who work closely with and represent equality groups and will seek feedback from the sector.

We will monitor implementation of the various elements of the policy.

Clare Muir

Isabel Edgar

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Completing Officer

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Lead Officer