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**Information for All Policy**

1. **Background**
   1. The policy covers the minimum standards to use when producing information to ensure accessibility and awareness.
2. **The Accessible Information Standard (AIS)**
   1. By law (section 250 of the Health & Social Care Act 2012), all organisations that provide NHS care or adult social care must follow the Accessible Information Standard (AIS). Whilst AIS only relates to specific Inspire North services, a decision has been made to incorporate this standard as policy across the whole organisation.
   2. In line with the AIS, people who have a disability or sensory loss must receive information that they can access and understand, and receive any communication support that they need.

2.1 As part of the standard we as organisations must:

2.1.1 Ask people if they have any information or communication needs, and find out how to meet their needs.

2.1.2 Record those needs clearly and in a set way.

2.1.3 Highlight or flag the person’s file or notes so it is clear that they have information or communication needs and how to meet those needs.

2.1.4 Share information about people’s information and communication needs with providers of NHS and adult social care, when we have consent or permission to do so.

2.1.5 Take steps to ensure that people receive information which they can access and understand, and receive communication support if they need it.

2.1.6 A standard print letter must **not** be sent to an individual who is unable to read or understand it.

1. **What does the Standard include?**

3.1 The Standard says that patients, clients, carers and parents with a disability or sensory loss should:

* + 1. Be able to contact, and be contacted by, services in accessible ways, for example via e-mail, text message or Text Reply.



* + 1. Receive information and correspondence in formats that they can read and understand, for example in audio, braille, easy read or large print.
    2. Be supported by a communication professional at appointments if this is needed to support conversation, for example British Sign Language interpreter.
    3. Get support from health and care workers and organisations to communicate, for example to lip-read or use a hearing aid.
    4. Compliance to the AIS must be reviewed at a minimum of every 12 months. All services must use the Diversity Minimum Standards Impact Assessment(Disability section) to assess their ability to readily provide information.

1. **The Housing Ombudsman’s Complaint Handling Code July 2020**
   1. As part of the Housing Ombudsmen code as landlords we must:

* + 1. make it easy for residents to complain, by providing different channels through which residents can make a complaint.
    2. Where a landlord has set up channels to communicate with its residents via social media, such as Facebook and Twitter, then it should expect to receive complaints via those channels. Policies should contain details of the steps that will be taken when a complaint is received via social media and how confidentiality and privacy will be maintained.
    3. make our complaint (feedback) policy available in a clear and accessible format for residents. This will detail the number of stages involved, what will happen at each stage and the timeframes for responding.
    4. comply with the Equality Act 2010 and may need to adapt normal policies, procedures, or processes to accommodate an individual’s needs.
    5. ensure our websites include information on how to raise a complaint. The complaints (feedback) policy and process shall be easily found and downloadable.
    6. ensure the complaints (feedback) policy and process should be publicised in leaflets newsletters, online and as part of regular correspondence with residents. A copy should be provided when requested.
    7. provide residents with contact information for the Ombudsman as part of its regular correspondence with residents.
    8. provide early advice to residents regarding their right to access the Housing Ombudsman Service, not only at the point they have exhausted the Inspire North complaints process. The Housing Ombudsman Service can assist residents throughout the life of a complaint. This affords the resident the opportunity to engage with the Ombudsman’s dispute support advisors.

1. **Easy to use information for people with a disability or sensory loss**

5.1 People with a disability or sensory loss asking for information should not be disadvantaged in terms of time, convenience, effort or comfort. It may not be necessary to produce information in another format if it can be provided face to face by an employee, and the person is happy with this.

5.2 In line with The Equality Act 2010 and AIS people with a disability or sensory loss should not be at a disadvantage when provided with goods, facilities and services. It should not be “impossible or unreasonably difficult” for people with a disability or sensory loss to use Inspire North services and this includes getting information.

5.3 The Equality Act 2010 says that people providing a service should make ‘reasonable adjustments’ to services. This can be by providing extra aids and services to make sure that d people with a disability or sensory loss are not disadvantaged. We must make sure, when it is reasonable, that people with a disability or sensory loss get information in different formats such as Braille, audio tape, computer disc, large print, in sign language and so on.

5.4 The law uses the phrase ‘reasonable adjustment’ to give some flexibility and allow for different solutions in different situations.

1. **What is “Reasonable”?**
   1. Things to think about when considering what is ‘reasonable’?
      1. How practical is it for the service to make the adjustment?
      2. Financial and other costs of making the adjustment
      3. The amount of disruption making the adjustments causes.
      4. Money already spent on making adjustments.
      5. The availability of help with the cost.
      6. Whether taking particular steps would help the person get the information.
   2. Minimum standards for Services, you will need to:
      1. Know how to provide information in different ways for people with a disability or sensory loss.
      2. Provide this free to people with a disability or sensory loss.
      3. Produce leaflets, letters and information offering at least an address, a telephone number and an email address including text phone numbers and mobile text numbers where available.
      4. Know how to book interpreters or lip speakers for people who are deaf, hard of hearing or deaf and blind.
      5. Know how to use and encourage others to use Typetalk for people who are deaf, hard of hearing or deaf and blind. This service may also help some people who are unable to speak or have impaired speech.
      6. Offer help to fill in forms and other paperwork.

6.3 Inspire North endeavours to provide information in a different format, wherever possible, within ten working days. If this is not possible we will say why, and a give date when the information will be available. People will be kept up to date about when they can expect to get the information they have asked for.

6.4 Further information on how to support people with a disability or sensory loss can be found in the document store in Teamsite, under the section ‘Accessible Information Standard (AIS)’.

6.6 All documents will be written in plain language.

1. **Standards for Written Information**

7.1 The following guidelines will help you to comply with The Equality Act 2010:

* + 1. Point size 12 is the absolute minimum.
    2. Use Arial Font (or a plain type face).
    3. All information and documents (whether internal or external) should be produced in plain English, this is not an alternative format but a style of writing that is standard practice.

* + 1. Avoid put writing over pictures or watermarks.
    2. Writing should always be in maximum contrast to the background, for example, black on yellow or white.
    3. Do not use block capitals, italics or underlining. Use bold instead.

1. **Translation**



8.1Happy to Translate [www.happytotranslate.com](http://www.happytotranslate.com)

8.2 Inspire North has signed up to the 7 Key Commitments which are principles by which Members of Happy to Translate agree to incorporate into their business.

8.3 As a Happy to Translate organisation we:

8.3.1 Promote equal access to information and services for all people and communities by helping them to overcome language and communication barriers.

8.3.2 Implement and maintain a high standard of customer service to improve access to information and services.

8.3.3 Provide professional language and communication support to clients according to the Happy to Translate best practice guidance.

8.3.4 Establish and maintain training and support on the use of Happy to Translate.

8.3.5 Actively display and promote the Happy to Translate logo to the communities it serves and according to the Logo Design Guidelines.

8.3.6 Monitor and evaluate the use of Happy to Translate and actively share and implement ideas for improvement.

8.3.7 When possible, participate in a joined-up approach with other organisations to promote language and communication support.

8.4 Within the member’s intranet you will find tools, information and helpful tips to assist you to follow the Happy to Translate procedures. All Diversity Team Leads and Managers have access to the site and will be happy to support you access the information.

8.5 The printed Toolkit and the Happy to Translate intranet site provide several practical tools to help you assess your client's language and the information and services they require.

8.6 Happy to translate maintains a Language Services Provider Directory.

1. **Considerations** 
   1. Where language is a barrier to communication, translating information into a language other than English is one possible solution.  Where this is an option we also have to consider other issues. These are:
      1. Is translating the information the best way to provide it?
      2. Some non-English speakers may not read their own language and some languages do not have a written form.  For these, translation is no use and information would need to be provided differently; for example, by speaking or by demonstrating.
      3. Research has shown that some people, whose first language is not English, prefer spoken English to written translations therefore consideration should be given to making arrangements for the documents to be in available in audio format.
2. **Translation Principles**
   1. The provision of language and communication assistance is one of the legal requirements placed on public bodies by the Equality Act 2010. The Human Rights Act 1998 also impacts on language and communication assistance**.**
   2. There is no law saying all materials should be translated. The Equality Act 2010 says that everyone should have access to services – translation may or may not make sure of this. The Human Rights Act only insists on translation if someone is arrested or charged with a crime.

**11. Should I translate this?**

11.1 The checklist below will help you to decide when, what and for whom to translate:

* + 1. Is it essential to translate this document?
    2. Can you give good reason for translating the document?
    3. What is the affect of not translating a document, for example, would it stop a client receiving a service?
    4. Are there other ways of getting information across, such as by working with other organisations?
    5. Does the entire document need to be translated?
    6. Are you sure that people will read well enough to understand the document?
    7. Should it first be made simpler through plain English, summarised or could you use pictures?
    8. Are you doing what The Equality Act 2010 says to make sure people can understand information?
    9. Will the translated information be used in full, or is it likely that it will sit on the shelf?

1. **Working in Partnership with Other Agencies**
   1. Could community groups, partners, or some other method, do a better job of giving the information out?
   2. Have other local or national agencies already translated the information and could you use it?
   3. Is there any way of doing this that is recognised nationally as the best way?

**13.   Interpreting**

13.1 Many employees regularly deal with customers whose first language is not English. Guidelines as follows:-

* + 1. Never ignore someone if you don't understand them;
    2. Speak more slowly than usual, using short sentences;
    3. Ask 'open' questions such as 'when', 'why', 'what', 'where', 'who', instead of questions where the answer is ‘yes’ or ‘no’.  Answers to these types of questions will let you know if you have been understood;
    4. Use clear gestures to show what you mean.
  1. In most cases, it should be clear that it is not right to use friends or family members to interpret. There are a number of reasons for this for example;

13.2.1 To make sure you don’t break data protection laws by keeping your discussion with the person private.

13.2.2 It may be important for the conversation to be private, for example when talking about their health.

1. **Telephone Interpreting**

14.1 Employees are advised to use a phone interpreting service to get initial essential information from clients. Telephone interpreting should be used only in the following circumstances:

* + 1. When contact is very short
    2. If a client requests this service (i.e. this may be to ensure anonymity).
    3. Emergency situations.

**15. Face to Face Interpreting**

15.1 Face-to-face interpreting is preferred when the issue being discussed is complex, highly detailed, and/or is seen as high risk or sensitive in nature.

15.2 Care should be taken to find an interpreter that best meets the needs of the client.

* 1. Issues that may need to be considered include:
     1. Gender
     2. Specific dialect
     3. Country of origin
     4. Specialist knowledge (for example, knowledge of mental health)
     5. Specialist language (for example, legal or medical terminology)

15.4 Face-to-face interpreting normally involves a minimum of three people (you, the client and the interpreter) meeting at a prearranged place and time.

15.5 It is best used for:

15.5.1 More complicated procedures and form filling.

* + 1. Longer interviews.

**16. General**

* 1. Please note this policy may be amended or delated at any time at Inspire North’s discretion.