NIPEC

NORTHERN IRELAND PRACTICE AND EDUCATION COUNCIL FOR NURSING AND MIDWIFERY

Accessible Formats Policy for the provision of information

July 2021

Any request for the document in another format or language will be considered

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1. Introduction

The Northern Ireland Practice and Education Council (NIPEC) is an Arms Length Body (ALB) sponsored by the Department of Health. Our role is to:

promote:
- high standards of practice among nurses and midwives
- high standards of education and learning for nurses and midwives
- professional development of nurses and midwives

and provide:
- guidance on the best practice for nurses and midwives
- advice and information on matters relating to nursing and midwifery.

We are not a regulatory body for nursing and midwifery and we do not provide front line health and social care services. The people we work with include:
- NMC registered nurses and midwives employed within the Province, UK and internationally,
- the Department of Health (DoH), formerly DHSSPS,
- the five Health and Social Care Trusts,
- organisations who provide post-registration education to nurses and midwives,
- the voluntary, independent and private sector who employ nurses and midwives.

The provision of information by the NIPEC is governed by our Publication Scheme. Our Information Governance Policy sets the context within which we operate to ensure we comply with the relevant legislation, including the UK Data Protection Act 2018, the Human Rights Act 1998 and the Freedom of Information Act 2000.

These policies also deal with all the information that our organisation holds including our information systems, and aim to support the protection, control and management of our information assets. In other words, it seeks to make sure that our information and information systems are protected against the many threats that exist. These range from damage by accident to sensitive information being deliberately disclosed.

The Accessible Formats Policy is concerned with access to information from a particular angle: ensuring the **equal** access to information between people with particular needs, based on their equality grouping, and others.

Our Equality Scheme commits us to ensure that we promote equality of opportunity and value the diversity of all people in our community. By this we believe that all members of society should have fair and equal access to our services, according to need, and have opportunities to participate in our plans for how we deliver our services. Through ensuring that our information is equally accessible we will continue to demonstrate this commitment.

Information produced by our organisation exists in many forms, including information about our role and functions, the work we do, and our resources, policies and procedures.

The majority of people and organisations we work with are from within the health and social care or education sectors and the majority of our information can be accessed via our website (https://nipec.hscni.net) - this means that health and social care and education organisations, nurses and midwives, and the public at large may be target groups of our information. By helping our staff to understand and think about how they provide information in accessible formats will help to improve information and communication standards.

The purpose of this policy is to help our organisation meet the information needs of individuals as effectively as possible by giving particular regard to accessible formats. This includes information for our staff.

We want to make sure that our approach to the provision of information either in written or alternative format is accessible, clear, balanced, fair, transparent and accurate. The policy is aimed at managers and staff involved in, or who have any responsibility for, the provision of information.

The policy sets out the standards that can be expected from us when we provide information, as regards its accessibility for those with particular needs.

Other important issues beyond accessible formats, not covered in any detail by this policy, need to be considered to make information more accessible for those with particular needs. These include consideration of the use of appropriate channels for the dissemination of information (including, for example, voluntary and community groups or networks). Likewise, appropriate mechanisms for the recording of needs of individuals for alternative formats (including, for example, on any computerised information systems) need to be taken into account.

2.   Scope

The Accessible Formats Policy relates to all of the nine categories covered by Section 75 equality legislation including age, gender, disability, ethnicity, sexual orientation, political opinion, dependants, religion and marital status.

There are however specific needs in relation to sensory impairment, learning disability, sexual orientation, older people, younger people, translation and interpreting for minority ethnic groups and more general literacy levels that are of particular importance in relation to this policy.

The policy aims to raise awareness of the importance of developing and providing accessible information by giving particular regard to accessible formats. Specifically it will:

- Highlight why information in accessible formats is important
- Describe what are accessible formats
- Outline priorities and criteria for producing information in accessible formats
- Highlight funding issues
- Outline responsibilities of our staff
- Provide links to guidance for providing and reviewing information in accessible formats
- Provide guidance on review and monitoring.

3.   Why is information in accessible formats important?

Information in accessible formats helps people to make decisions and choices. It allows the principle of informed consent to be put into practice. Effective information is vital for the provision of high quality services and care.

It is important to remove barriers so that people with particular needs are not excluded from accessing our information and services when compared with others.

Information must be accessible, easy to understand, relevant and appropriate to target audiences. If people cannot get it, read it, hear it or understand it information is of little value. What we produce needs to be of a quality that is fit for purpose and appropriate to the target audience. This does not mean simplifying the message too much, appearing patronising or reducing the quality of the content. What it does mean is taking information that is in a format that is not accessible to an individual, and changing it to reflect their preferred format suitable for the particular setting.

Legislative Context

A number of legal requirements under the Disability Discrimination Act 1995 (Amendment) Regulations (Northern Ireland (2004), Race Relations Order 1997; Human Rights Act 1998; Section 75 of the Northern Ireland Act 1998; the Public Sector Bodies (Websites and Mobile Applications) (No.2) Accessibility Regulations 2018; and the Health and Social Services (Reform) Northern Ireland Act 2009 mean we need to ensure that our services, including information, are accessible.

The latter placed a duty on health and social care organisations to deliver Personal and Public Involvement. Similarly, the United Nations Convention on the Rights of Persons with Disabilities, and the United Nations Convention on the Rights of the Child also relate to issues of accessibility.

The UK-wide Accessibility Regulations 2018[1] apply to websites: internet; intranet; and extranet sites (whether in-house or outsourced) and mobile applications. Public authorities have to:

- ensure that their websites and mobile applications meet the WCAG2.1AA accessibility standard; and
- publish an accessibility statement that explains how accessible the website or mobile application is.

Specific additional requirements with regards to accessibility for people with a disability also arise in the procurement context. Under the Public Contracts Regulations 2006, 9(3):

"When laying down technical specifications (…), a contracting authority shall, wherever possible, take into account accessibility criteria for disabled persons or the suitability of the design for all users."

The Disability Discrimination Act and the United Nations Convention on the Rights of Persons with Disabilities contain specific provisions relating to accessible formats.

The Disability Discrimination Act 1995 (the DDA) as amended by the Disability Discrimination Act 1995 (Amendment) Regulations (Northern Ireland) 2004[2]

The Equality Commission explains:

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[1] https://www.gov.uk/guidance/accessibility-requirements-for-public-sector-websites-and-apps#meeting-accessibility-requirements
[2] http://www.equalityni.org see section 'Your Rights – Disability'

"Under the DDA, it is unlawful for service providers to treat people with disabilities less favourably than other people for a reason related to their disability. Service providers have to make 'reasonable adjustments' to the way they deliver their services so that people with disabilities can use them.

Accordingly, in order to address some of the practical difficulties that these barriers present, the disability legislation, unlike other anti-discrimination legislation, creates a positive duty on employers and service providers to make 'reasonable adjustment' to their policies and premises where reasonable and appropriate. The reasonable adjustment duty in relation to goods, facilities or services is 'anticipatory' in nature and owed to the public at large.

The DDA provides a list of examples to which the duty applies: This includes:

- providing an auxiliary aid or service if it would make it easier for disabled people to make use of a service, including the provision of information in an alternative format
- access to and use of means of communication;
- access to and use of information services."

Appendix 1 of this policy provides further information contained in the Equality Commission's Codes of Practice which accompany the disability discrimination legislation[3].

United Nations Convention on the Rights of Persons with Disabilities[4]

Article 9 – Accessibility

"1. To enable persons with disabilities to live independently and participate fully in all aspects of life, States Parties shall take appropriate measures to ensure to persons with disabilities access, on an equal basis with others, to the physical environment, to transportation, to information and communications, including information and communications technologies and systems, and to other facilities and services open or provided to the public, both in urban and in rural areas. These measures,

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[3]Equality Commission for Northern Ireland (2013): Disability Discrimination Act 1995 (as modified by Schedule 8 thereof for application in Northern Ireland) – Code of Practice – Employment and Occupation.
Equality Commission for Northern Ireland (2003): Disability Discrimination Act 1995 (as modified by Schedule 8 thereof for application in Northern Ireland) – Code of Practice – Rights of Access – Good, Facilities, Services and Premises.
[4]http://www.un.org/disabilities/convention/conventionfull.shtml

which shall include the identification and elimination of obstacles and barriers to accessibility, shall apply to, inter alia: (…)

b. Information, communications and other services, including electronic services and emergency services."

Furthermore, anti-discrimination legislation with regards to race is relevant.

Race Relations (Northern Ireland) Order 1997 (as amended)[5]

Discrimination in provision of goods, facilities or services

"21.—(1) It is unlawful for any person concerned with the provision (for payment or not) of goods, facilities or services to the public or a section of the public to discriminate against a person who seeks to obtain or use those goods, facilities or services -
(b)by refusing or deliberately omitting to provide him with goods, facilities or services of the same quality, in the same manner and on the same terms as are normal in his case in relation to other members of the public or (where the person so seeking belongs to a section of the public) to other members of that section."

Appendix 1 of this policy provides further information contained in the Equality Commission's Code of Practice and other relevant documentation which accompanies the race relations legislation[6].

Under the Human Rights Act, some of the articles are of particular relevance to the issue of accessible formats: Article 6 - the right to a fair trial; Article 8 - the right to respect for one's private and family life, correspondence and home; and Article 10 - the right to freedom of expression, freedom to hold opinions and freedom to receive and impart information.

Section 75 of the Northern Ireland Act 1998 places the duty on public authorities to have due regard to the need to promote equality of opportunity between the nine equality categories of persons of different religious belief, political opinion, racial group, age, marital status or sexual orientation; men and women generally; persons with a disability and persons without; and persons with dependants and persons without.

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[5]http://www.legislation.gov.uk/nisi/1997/869/contents/made
[6]Equality Commission for Northern Ireland (1999): Code of Practice for the elimination of Racial Discrimination and the promotion of equality of opportunity in employment.

Standards in health and social care and Equality Scheme commitments

Health and Social Care organisations are bound by the "Quality Standards for Health and Social Care", produced by the then Department of Health, Social Services and Public Safety in 2006, to consider the diverse needs of the public, services users, carers and staff alike in any information.

Also, one of the five standards introduced by the publication entitled "Improving the Patient and Client Experience" (Department of Health, Social Services and Public Safety, Northern Ireland Practice and Education Council for Nursing and Midwifery, Royal College of Nursing 2008), the Communication Standard is defined as: "all health and social care staff communicate in a way which is sensitive to the needs and preferences of patients and clients."

Our Equality Scheme, which arises from our commitments under Section 75, further commits us to giving attention to what needs to be done to make sure information and services are accessible.

The information needs of people with sensory, learning, communication and mobility disabilities, members of minority ethnic groups, whose first language is not English, and children and young people were specifically identified within our scheme.

Audit of inequalities

Our audit of inequalities was undertaken in order to address identified inequalities. One of the key barriers identified by this audit was the difficulties experienced by a number of people in accessing information and services when compared with other equality groupings. The audit action plan included the need for the production of an Accessible Formats Policy to redress this so as to ensure provision of information in a range of suitable formats.

4.   What are accessible formats?

A large number of people find it difficult to read the typical information available from health and social care organisations, not least when it is lengthy or when jargon and abbreviations are used. Accessible information is about using plain language to make information easier to understand for everyone and thereby more effective.

Accessible formats may be described in a number of ways according to different needs and experiences. A format can be defined as the general form, appearance and layout of a publication. A visually impaired person may need information in audio format. A deaf person may need a sign language

interpreter. A learning disabled person may need it in an easy read version. A person who does not speak English as a first language may need a translation or an interpreter. Some people may need a combination of these supports.

Information that is accessible may be provided in printed and electronic document. Commonly requested accessible formats include, for example:

- large print
- Braille
- audio visual formats (CD, video including subtitles or signed content, mp3 or DAISY)
- Easy Read
- electronic format or email
- translations.

The information can also be made accessible in other ways, including face to face and telephone communication, e.g. interpreters for minority ethnic languages, sign language and voice interpreters.

What is produced needs to be of a quality that is fit for purpose and appropriate to the target audience. It needs to be delivered in a timely way within expected timescales. Some information is more time sensitive than others so organisations need to allow for flexibility to respond quickly. Information to be discussed at a meeting needs to be made available well in advance of the meeting date.

This policy makes the provision of information central to our work.

The types of areas that it applies to include for example:

- NIPEC information provided in leaflet, booklet, brochure, poster or audio visual format, DVDs
- Reports such as Corporate Plans, Business Plans and consultation documents
- Policies
- Job descriptions
- Agendas and minutes of meetings including Board or Council papers
- Newsletters
- Presentations
- NIPEC Websites including the Careers Website Nursing and Midwifery Careers | NIPEC (hscni.net)

5.   Priorities for producing information in accessible formats

Whilst we have always had a commitment to provide information in an alternative format on request, in theory all information that is available to the public should be provided in accessible formats. However given the quantity of information that is produced by our organisation on a daily basis and the availability of limited resources it is accepted that this is not possible or practical to do so.

It is therefore necessary to ensure a robust decision making process is in place, for prioritising information provision in accessible formats. This needs to be reasoned and evidence based. We need to consider the reasonableness of our decision, balancing this with the rights of individuals to have equal access to information by receiving it in an appropriate format. We will use the following criteria for making documentation available in alternative formats. This is based on the premise that within limited resources we need to decide priorities that have the most impact for service users. The priorities include:

- being able to access and use our resources arising from projects / initiatives / workstreams
- documentation with basic information on how individuals can make contact with the organisation, provide feedback or obtain details on how to make a complaint.

Reasonable alternatives

Within the priority areas as identified in Section 5, where it is more effective, cost efficient or timely to do so, we will ensure a reasonable alternative is provided, such as:

- providing information face to face
- providing information by telephone or email
- using an interpreter
- providing summaries.

6.   Formats and languages – accessibility statement

All documents need to include an accessibility statement in English at the start of the document. The statement should say:

"Any requests for the document in another format or language will be considered."

In addition, we will consider translating and including this statement into the most common minority ethnic languages as identified by the Northern Ireland Health and Social Care Interpreting Service and the European Charter on Regional and Minority Languages.

If any accessible formats or other languages have already been produced we will include the following statement:

> *"This document is available in … (list the formats and languages) but any further requests for the document in another format or language will be considered."*

In addition, we will again consider translating and including this statement into the most common minority ethnic languages as identified by the Northern Ireland Health and Social Care Interpreting Service and the European Charter for Regional and Minority Languages.

7. Who funds accessible formats?

It is our responsibility to make information equally accessible between those with particular needs, based on their equality groupings, and others.

The responsibility for meeting the cost of producing and disseminating information in accessible formats lies with NIPEC. A key consideration is the level of overall budget available. If the information is to be produced by a third party, NIPEC should highlight the requirements on accessibility issues at the start of the commissioning process to ensure that the information produced complies with relevant legislation.

In establishing costs for the production of the information, we will consider any additional costs associated with producing it in alternative formats and make sure that the product will be within the cost. Whilst in some instances the cost of producing information in accessible formats will be minimal, the production in other formats can add considerably to costs.

Careful thought about appropriate circulation can increase equal access to information. Making contact with organisations or individuals who could help with dissemination can help reduce costs. Within our identified circulation costs, we will include items such as postage, delivery, display, web and telecommunications costs, and magazine or newspaper advertising charges.

8.   Practical advice on making information accessible

Section 2 of this policy highlighted the groups where there are particular needs in relation to the provision of written accessible information. These include sensory impairment, learning disability, sexual orientation, older people, younger people, translation and interpreting for minority ethnic groups and others with general literacy issues.

Practical guidance is available at **Appendix 2.**

In addition, guidance published in 2016 - *'Making Communication Accessible for All: A Guide for Health and Social Care Staff'* – provides health and social care staff with practical tips, advice and guidance to enable them to communicate more effectively with people who are disabled or have a communication support need.

9.   Organisational commitments - roles and responsibilities

For the implementation of this policy to be effective, it is necessary that a structure and process is in place and that this is co-ordinated across the organisation.

Each member of staff needs to be aware of the Accessible Formats Policy. They need to ensure that they take individual responsibility for communicating and providing information in an accessible way that recognises that this is a right of people who need to access our services, not a privilege.

There are various levels of staff who carry responsibility in respect of the Accessible Formats Policy and their roles and responsibilities are outlined below.

Council members will ensure that as part of their role of approving and receiving progress reports in relation to the equality scheme, human rights and personal public involvement commitments, they oversee work in relation to accessible information.

Chief Executive, as NIPEC's Accountable Officer, is accountable for ensuring that the organisation meets its legislative requirements and promotes good practice in the area of the provision of information in accessible formats.

The **Business Team / Senior Officers** will ensure that:

- Decisions taken on the production of information in accessible formats are reasoned, evidence based and based on the priorities in this policy
- Staff are made aware of the policy and receive appropriate training
- A system for reviewing information in accessible formats is in place and implemented in accordance with agreed timescales.
- There is a clear structure and process in place for implementing, reviewing the policy and associated guidelines
- In the review and implementation of this policy there is appropriate involvement and engagement with those with a particular expertise in the production or who use alternative formats
- Any equality or human rights issues emerging from the screening of the policy are examined in the context of implementation and review
- A method, including agreed criteria, for audit and quality assurance of information is in place
- Funding is determined in accordance with the priority areas for the provision of information in accessible formats
- The policy is monitored and reviewed in accordance with agreed time lines
- Any amendments are incorporated into the policy and guidelines in accordance with changes in legislation, policy or practice
- Reporting of progress in relation to implementation and compliance is undertaken.

Information Authors will ensure that they:

- In accordance with priority areas, get information produced in alternative formats
- Follow the Accessible Formats Policy, and related guidance including the Public Sector Bodies (Websites and Mobile Applications) (No. 2) Accessibility Regulations 2018
- Make decisions on the basis of the criteria for producing information in accessible formats and on the outcomes of equality screening exercises
- In accordance with priority areas, ensure that information is received in a timely manner in a format that suits the individual's or group's needs
- Ensure that information published follows agreed corporate house styles
- Where feedback received suggests changes to information, where appropriate, that a system is put in place to review and address these
- When working with community, voluntary and the independent sector ensure that these organisations follow the Accessible Formats Policy and related guidance and that this is included in the contract conditions.

The **Corporate Services Manager** will:

- Provide general advice on information in accessible formats
- Ensure that advice is provided on corporate house styles.
- Ensure that guidelines in relation to accessible formats become part of corporate house style.

Equality staff will:

- Provide support and advice generally on equality considerations of information in accessible formats
- Advise on compliance issues in relation with equality duties in respect of this policy.

10. Review

This policy will be reviewed on a three-year basis. If legislation changes or if there are major changes to policy or practice then the date for review may be brought forward.

11. Monitoring

Monitoring of this policy and associated guidance will take place on a yearly basis. This will capture information on the provision of information in alternative formats and the number of requests made and type of formats requested and costs.

Reporting of progress will also be undertaken in accordance with commitments provided in our equality scheme.

12. Screening

This policy has been screened for equality implications as required by Section 75 and Schedule 9 of the Northern Ireland Act 1998.

The screening has identified specific equality impacts and outlines the way that these will be addressed. No significant equality implications have been identified therefore the policy will not be subject to an equality impact assessment.

The equality screening has been published and can be accessed here
http://www.hscbusiness.hscni.net/services/2166.htm

Equality Commission Codes of Practice

Equality Commission for Northern Ireland (2003):

Disability Discrimination Act 1995(as modified by Schedule 8 thereof for application in Northern Ireland) – Code of Practice

Rights of Access – Goods, Facilities, Servicesand Premises

Pages 65-66:

> "A service provider must take reasonable steps to provide auxiliary aids or services if this would enable (or make it easier for) disabled people to make use of any services which it offers to the public.
>
> The Act gives two examples of auxiliary aids or services: the provision of information on audiotape and the provision of a sign language interpreter." (…)
>
> "But these are only illustrations of the kinds of auxiliary aids or services which a service provider might need to consider. An auxiliary aid or service might be the provision of a special piece of equipment or simply extra assistance to disabled people from (perhaps specially trained) staff. In some cases a technological solution might be available."

Page 50:

> "(…) without intending to be exhaustive, the following are some of the factors which might be taken into account when considering what is reasonable:

- whether taking any particular steps would be effective in overcoming the difficulty that disabled people face in accessing the services in question;
- the extent to which it is practicable for the service provider to take the steps;
- the financial and other costs of making the adjustment;
- the extent of any disruption which taking the steps would cause;
- the extent of the service provider's financial and other resources;
- the amount of any resources already spent on making adjustments;
- the availability of financial or other assistance."

Equality Commission for Northern Ireland (2003):

Disability Discrimination Act 1995(as modified by Schedule 8 thereoffor application in Northern Ireland) – Code of Practice – Employment and Occupation

Pages 71-78

"What adjustments might an employer have to make?

The Act gives a number of examples of adjustments, or 'steps', which employers may have to take, if it is reasonable for them to have to do so (see paragraphs 5.24 to 5.42). Any necessary adjustments should be implemented in a timely fashion, and it may also be necessary for an employer to make more than one adjustment. It is advisable to agree any proposed adjustments with the disabled person in question before they are made. The Act does not give an exhaustive list of the steps which may have to be taken to discharge the duty. Steps other than those listed here, or a combination of steps, will sometimes have to be taken. However, the steps in the Act are: (…)

- modifying instructions or reference manuals;

  The format of instructions and manuals might need to be modified for some disabled people (eg, produced in Braille or on audio tape) and instructions for people with learning disabilities might need to be conveyed orally with individual demonstration.

- modifying procedures for testing or assessment;

  This could involve ensuring that particular tests do not adversely affect people with particular types of disability. For example, a person with restricted manual dexterity would be disadvantaged by a written test, so the employer gives that person an oral test instead."

Equality Commission for Northern Ireland (1999):

Code of Practice for the elimination of Racial Discrimination and the promotion of equality of opportunity in employment

Pages 18-19

"Communications and language training for employees

2.25　Although there is no legal requirement to provide language training, difficulties in communication can create barriers to the provision of equality of opportunity in the workplace. Good communications can improve efficiency, promotion prospects, health and safety and create a better understanding between employers, employees and unions. Where the workforce includes current employees whose English is limited it is recommended that steps are taken to ensure that communications are as effective as possible.

2.26　These should include, where reasonably practicable:

a.　provision of interpretation and translation facilities, for example, in the communication of grievance and other procedures, and in terms of employment; (…)

d.　the use of alternative or additional methods of communication, where employees find it difficult to understand health and safety requirements, for example:
- translations of safety signs and notices
- instructions through interpreters
- instruction combined with industrial language training."

Equality Commission for Northern Ireland (2011):

Goods, facilities, services and premises - a short guide to discrimination law

Page 6

"Indirect race discrimination - Regulations introduced in 2010 amended the definition of indirect race discrimination so that it covers not only individuals who are put at an actual disadvantage by a provision, criterion or practice but also individuals who would be put at such a disadvantage. This will therefore cover individuals who are deterred from trying to access a service because of a provision, criterion or practice.

Like direct discrimination, indirect discrimination can be unlawful even if it is not intentional. For any comparisons to take place under indirect discrimination, the circumstances in the case should be the same or not materially different.

Example:
A bank writes its mortgage and loan agreements in the English language only. While this policy is applied equally to everyone it disadvantages people from non English speaking countries. A failure to translate documents or to provide an interpreter could be indirect race discrimination if it means that certain groups are unable to access the service, unless it can be justified."

Practical advice on making information accessible

In line with the Accessible Formats Policy, the purpose of this document is to provide practical advice on how to make written information accessible.

This information has been collated from existing guidance issued by voluntary sector groups and feedback provided from service users and groups at a workshop in October 2010.

With regards to people with a disability, in 2016 - 'Making Communication Accessible for All: A Guide for Health and Social Care Staff" – was produced to provide health and social care staff with practical tips, advice and guidance to enable them to communicate more effectively with people who are disabled or have a communication support need.

Part 1 of this document outlines general advice on making information accessible, whilst **Part 2** provides advice on making information accessible for and inclusive of particular equality groupings. These include: sensory impairment, learning disability, people with dyslexia or literacy difficulties, sexual orientation, older people, younger people, translation and interpreting for minority ethnic groups.

Part 1: General guidelines on making information accessible

Presenting information

- Use simple language and short sentences. This makes information easier to understand for everyone.
- Keep the layout of regular publications consistent for example, a monthly newsletter. But make sure that you are flexible and can give people the information in different ways.
- To address literacy difficulties use simple, clear text with short sentences, simple punctuation and no jargon, acronyms or abbreviations.
- Use 12 point Arial as minimum but ideally use size 14 point Arial.
- Avoid block capitals, italics or underlining. They all make text harder to read.
- Use a ragged right edge rather than fully justified text.
- Plan what you want to write. Cut out any unnecessary detail and present important ideas in a logical order.
- Use active and personal language. Using 'you' and 'we' makes your writing clearer and more direct.

- Avoid using slashes between words. It is better to say "and" or "or" rather than "and/or".
- Finish a sentence at the end of a page. Do not run a sentence across two pages.
- Consider the range of alternative formats that include Easy Read, Braille, audio formats (CD, mp3 or DAISY), video formats (DVD, subtitled or signed), large print or minority languages to meet the needs of those for whom English is not their first language.
- Where you are using information that another organisation has produced (for example information about a venue) ask them for that information in different formats so that you can pass it on to anyone who needs it. If they are service providers, they will have duties under the Disability Discrimination Act NI (DDA) 1995 to provide information in this way.
- Displaying information that is targeted at people with a disability; lesbian, gay, bisexual and transgender people; children and young people; older people; and people from balck and ethnic minority backgrounds on creates a welcoming atmosphere. This could include showing people from the diverse community in which we live.

Printing handouts of Powerpoint presentations

- If you are producing handouts of a Powerpoint presentation avoid using the option for printing handouts 3 slides per page as this it renders the font size completely inaccessible for your reader. Instead, keep the full page slide and use the option to print out 2 (or 4) pages per sheet in the printer properties. This will keep the font size accessible and still provide sufficient space for the reader to write down notes.

Using images and photographs

- Images, when used properly, make writing easier to understand and more attractive.
- Use images, like photographs, drawings or symbols to support your text. Aim to make your material clear at a glance, even to a person who does not have good reading skills.
- It is best to stick to one type of image and avoid mixing photographs, line drawings and images.
- Images should show people from different cultures, people with disabilities, people with different sexual orientation, different age groups, different genders. They can also show specific buildings or people. Be mindful of the relevance of the image being used and avoid the risk of stereotyping.
- Be consistent where you place pictures in relation to text – either to the left or to the right. Avoid alternating between the two.

- People prefer coloured pictures, rather than just black and white.
- Drawings should not be childish or patronising - the best are often the simplest.
- Be careful about using humour to portray an idea. Humour can distract from or confuse the message and may also offend some people.
- Some people put a photograph of the writer at the end of a letter or article.
- Generally, photographs are the most popular kind of image with readers. They can hold a lot of information, easily be 'read' and help when talking about a certain person or building.
- Photographs have to be carefully taken to make sure they show one idea clearly. For example, a photograph of a person illustrating the idea that they are happy, should not have a busy background and distract from the main idea of the picture.
- You should be aware that photographs do not always photocopy well.
- You must always ask permission if you are taking or using photographs of people you are working with.
- When using images and photographs be mindful of copyright issues and that you need to adhere to the respective legislation. For example, if using images you should make sure you own the image or photograph or get written permission from the owner or photographer. Permission for use is also required from 'models' in the photo and all these need filed properly. Permission may also not transfer across publications or various media.

Using video and audio materials

- Consider making information available as videos (including signed content and subtitles) or audio recordings on CD or DVD or digitally on the internet, especially if you know your users are deaf, hard of hearing, blind or partially sighted.
- Put information on CD and DVDs.
- If using audiotapes, keep them short.
- When one side of the audiotape is at an end, say this so the user knows to turn the tape over.
- Be consistent when you say numbers. Say zero instead of '0'.
- When people see a video on CD or DVD it will often be in a small box on the screen. Big close up shots are therefore better than long shots or wide shots.
- It is especially important to make sure verbal communication, for example, as videos or audio recordings on CD or DVD or digitally on the internet, is simple and clear as people will probably be listening to it on small computer speakers.

- For computer-based information, you might want to offer an audio version of your text and a text version of your audio that can run at the same time.

Using the internet to present information

- In theory the internet makes information more accessible to a wider public and allows internet users to adjust certain formatting elements according to their needs. However, be aware that some groups are less likely to use the internet, above all older people and people with a disability.
- Provide text alternatives for any visual or audio content (including images) so that it can be changed into other formats people need, such as large print, braille, speech, symbols or simpler language. Equally, provide signed video alternatives for text or audio content.
- Create content that can be presented in different ways (for example simpler layout) without losing information or structure.
- Make it easier for users to see and hear content including separating foreground from background. If the information is conveyed through colour differences in an image (or other non-text format), the colour may not be seen by users with colour deficiencies.
- Provide users enough time to read and use content. People with disabilities such as blindness, low vision, dexterity impairments, and cognitive limitations may need more time to read content or to perform functions such as filling out on-line forms. If web functions are time-dependent, it will be difficult for some users to perform the required action before the set time runs out. This may make the service inaccessible to them. Provide options to disable time limits,
- Do not design content in a way that is known to cause seizures. Ensure you do not include anything that flashes more than three times in any one second period.
- Moving, blinking, scrolling, or auto-updating information can distract users during their interaction with a web page. Content that moves or auto-updates can be a barrier to anyone who has trouble reading stationary text quickly as well as anyone who has trouble tracking moving objects. It can also cause problems for screen readers. Include a mechanism for the user to pause, stop, or hide this information.
- Provide ways to help users navigate, find content, and determine where they are.

Where to go for further support and advice on presenting information on the internet

The UK-wide Public Sector Bodies (Websites and Mobile Applications) (No.2) Accessibility Regulations 2018 apply to websites: internet; intranet; and extranet sites (whether in-house or outsourced) and mobile applications. Information on what public authorities must do can be found at https://www.gov.uk/guidance/accessibility-requirements-for-public-sector-websites-and-apps#meeting-accessibility-requirements

Practical guidelines have been developed on an international level. The Web Content Accessibility Guidelines (WCAG) 2.0 (www.w3.org/TR/WCAG20) cover a wide range of recommendations for making web content more accessible.

Following these guidelines will make content accessible to a wider range of people with disabilities, including blindness and low vision, deafness and hearing loss, learning disabilities, cognitive limitations, limited movement, speech disabilities, photosensitivity and combinations of these.

It will also often make web content more accessible to users in general.

Part 2: Guidelines on making information accessible for and inclusive of particular equality groupings

Making information accessible for black and ethnic minority people

- People who are black or who identify themselves as ethnic minorities have very varied needs. Try to avoid making assumptions.
- Work with people from black and minority ethnic communities to ask them how they want their information presented.
- Find out as much as you can about the black or minority ethnic community group or groups your information is for, so you can make sure it meets their needs.
- Do not just translate information into another language as direct translation from English into another language doesn't always make sense. Translations need to take account of culture.
- Use translators and interpreters who have proper training and who understand cultural differences. The translator may use words and pictures to help people feel the information is right for them.
- Produce leaflets in different languages if required.

Arrangements for producing materials in alternative formats

a.   Translations

All Health and Social Care organisations have access to a regional contract with a number of approved suppliers who can provide translation services under the contract. If you procure a translation you will need to meet the cost. Further information can be obtained at
www.hscbusiness.hscni.net/services/1834.htm

b.   Interpreting

If you require an interpreter face-to-face or via the telephone, for a service that you provide to patients and clients, contact the HSC Interpreting and Translation Service at interpreting@hscni.net

Using video and audio materials for black and minority ethnic groups

- Think about the voices and music you use – make sure they are appropriate.
- Videos can be a good way of getting information about health to people from black and minority ethnic communities.

Using images for black and minority ethnic groups

- Make sure people from black and minority ethnic groups are portrayed in the pictures you use. Use positive images of different people and different cultures.
- The way people use and understand pictures varies from one culture to another. Think about who is shown in the picture, the expression on their face, what they are wearing, their body language and the scene around them.
- Pictures can be used to show which community a person belongs to. Decoration, jewellery, dress and colours can all mean something to people. Small details can help people feel the information is right for their community. At the same time, be cautious about not stereotyping.

Translations and Interpreting for Irish and Ulster Scots under the European Charter for Regional and Minority Languages

The European Charter for Regional and Minority Languages is the European convention for the protection and promotion of languages used by traditional minorities. In NI, the Charter applies to Irish and Ulster-Scots but does not cover sign languages or the languages of minority ethnic communities.

Health and Social Care organisations have an obligation to receive requests and applications in Irish and Ulster Scots, but have no such obligation to respond in kind if it is not possible.

a.   Translations

The New Decade, New Approach agreement was published in January 2020 with a key recommendation to establish a central Irish and Ulster-Scots translation hub to provide language translation services for the public sector in Northern Ireland. This hub can be contacted at translationhub@commuities-ni.gov.uk or at (028) 9051 5114 (8am to 5pm).

b.   Interpreting

Interpreting for Irish and Ulster Scots is covered under the HSC Interpreting and Translations contract. Further details on how to procure an interpreter can be accessed at www.hscbusiness.hscni.net/services/1834.htm or by contacting interpreting@hscni.net

For further information on obligations under the Charter please refer to your organisation's Code of Courtesy.

Making information accessible for older people

- Avoid using blue as it is often harder for older people to read.
- Use matt paper to avoid brightness and glare which make it hard for older people to read.
- Use a minimum font size of 14 point and 20 point for people with visual impairments.
- Consider using an A3 format (as an A4 booklet) as you can use larger print and images which are easier for people to see.

Where to go for further support and advice

If you are developing materials and you want to engage with older people to make sure they are accessible for them, you can check out contact details for organisations representing older people in the following resource: 'Signpost to Support Networks in the Community' www.hscbusiness.hscni.net/services/1801.htm

Making information accessible for children and young people

- Consider using coloured fonts, but make sure you use colours that are clearly visible.

- Do not use the font Comic Sans as this is difficult to read.
- Consider using cartoons and photographs. This may be more appropriate for younger children.
- Use simple language.

Arrangements for producing materials in alternative formats

Individual Health and Social Care organisations should ensure that organisations or individuals selected to produce materials in alternative formats for children and young people are selected in accordance with HSC Procurement requirements.

For further information on how to procure such formats, contact Janet Hall, NIPEC's Corporate Services Manager at 0300 300 0066 or at janet.hall@nipec.hscni.net

Where to go for further support and advice

If you are developing materials and you want to engage with children and young people to make sure they are accessible for them, you can contact:

Children in Northern Ireland (CiNI)
Unit 9, 40 Montgomery Road
Belfast BT6 9HL
Email: info@ci-ni.org.uk
Tel: 028 9040 1290
Fax: 028 9070 9418

Also, check out contact details for organisations representing children and young people in the following resource: 'Signpost to Support Networks in the Community' www.hscbusiness.hscni.net/services/1801.htm

Making information accessible to lesbian, gay, bisexual and transgender people

- Lesbian, gay, bisexual and transgender people are often grouped together because they are all targets of similar forms of discrimination. Within these communities, however, there is a tremendous diversity of experience. Materials that are produced and the images used for lesbian,gay, bisexual and transgender communities need to recognise the wide range of backgrounds that people come from.
- Many languages use terms to describe lesbian, gay, bisexual and transgender people which may be derogatory. If you are translating material, be aware of the cultural context of the terms you are using.

- As a general rule avoid using the label 'homosexual' as it is still viewed negatively. Most people are happy with lesbian, gay, bisexual or transgender but if in doubt - ask!
- Use neutral language such as 'partners',' parents' and 'he or she'. Avoid using the term 'spouse' and exclusive pronouns (referring to 'he' only or 'she' only) as those assume that all couples are heterosexual.
- Use images and photographs of lesbian,gay, bisexual and transgender people – such as same sex couples – in a wide range of your publicity materials, not just in documents which are specifically aimed at lesbian,gay, bisexual and transgender people. This sends out a clear message that you recognise the positive contribution that lesbian,gay, bisexual and transgender people can make to our society and that your entire organisation is welcoming to lesbian,gay, bisexual and transgender people. At the same time, be cautious about not stereotyping.

Where to go for further support and advice

Check out contact details for organisations representing LGB&T people in the following resource: 'Signpost to Support Networks in the Community' www.hscbusiness.hscni.net/services/1801.htm

Further advice and resources can be found on Stonewall's website – https://www.stonewall.org.uk/help-and-advice

Making information accessible to people with a disability

As mentioned at the start, the HSC Trusts recently produced new guidance focusing on communicating with people with a disability, which looks at various ways of communicating. The focus of this document is advice relating to the provision of written information (and alternative formats).

Following the advice provided in Part 1 (General guidelines on making information accessible) will ensure that you meet many of the specific needs of people with a disability. Over and above these, the following guidelines apply to specific types of disabilities.

Making information accessible to people with a learning disability

- Use 16 point Arial or bigger.
- Avoid using green as colour for paper.
- Avoid words in white on a coloured background – they can be harder to read.
- Avoid shiny paper.

- Avoid punctuation other than full stops.
- Use bullet points for examples and instructions.
- Use numerals for numbers not words (10 instead of ten).
- Use just 1 idea in every sentence.
- Use words and concepts consistently throughout a document.
- Consider including a glossary to explain any terms that you are using.
- Consider using symbols and pictures to convey messages.
- Use pictures of places rather than maps.
- Avoid using charts.
- Avoid splitting sentences over 2 pages.
- Avoid using columns.
- Consider using alternative formats such as Easy Read or Makaton.

Arrangements for producing materials in alternative formats

Individual Health and Social Care organisations should ensure that organisations or individuals selected to produce materials in alternative formats for people with a learning disability, such as Easy Read or Makaton, are selected in accordance with HSC Procurement requirements.

For further information on how to procure such formats, contact: Janet Hall, NIPEC's Corporate Services Manager at 0300 300 0066 or at janet.hall@nipec.hscni.net

Where to go for further support and advice

If you are developing materials and you want to engage with people with a learning disability to make sure they are accessible for them, you can check out contact details for organisations representing people with a learning disability in the following resource: 'Signpost to Support Networks in the Community' www.hscbusiness.hscni.net/services/1801.htm

Making information accessible to people who are blind or partially sighted

Make sure you adhere to the General Guidelines presented in Part 1. In addition, the following is important to address the needs of those who are partially sighted:

- Use line spacing that provides for at least 1.5 to 2 times the space between words within a line.
- Make sure that your text clearly contrasts with your background. Use dark against light rather than the other way round.
- Avoid setting text vertically.

- Avoid columns. If you need to use them, make sure there is a sufficient gap between them.
- Don't put text on top of images.
- Don't use glossy paper.
- Some peope who are blind or partially sighted find it difficult to read numbers. Use words instead.
- You can easily produce documents in large print. These use a larger type size, between 16 and 22 points. If you are unsure, ask the individual what size they prefer.

For those who have no useful sight for reading print, consider producing materials in alternative formats, such as Braille, signage, tactile images or audio and DAISY.

DAISY stands for Digital Accessible Information System - a digital reading format that can combine audio, text and graphical information in one production. People can access the format through a standalone DAISY player, or by using a DAISY software player on a computer.

Arrangements for producing materials in alternative formats

Individual Health and Social Care organisations should ensure that organisations or individuals selected to produce materials in alternative formats for people who are blind or partially sighted, such as Braille, signage, tactile images or audio and DAISY are selected in accordance with HSC Procurement requirements.

For further information on how to procure such formats, contact: Janet Hall, NIPEC's Corporate Services Manager at 0300 300 0066 or at janet.hall@nipec.hscni.net

Where to go for further support and advice

If you are developing materials and you want to engage with people who are blind or partially sighted you can check out contact details for organisations representing people who are blind or partially sighted in the following resource: 'Signpost to Support Networks in the Community' www.hscbusiness.hscni.net/services/1801.htm

Making information accessible to people who are deaf or hard of hearing

People who are deaf or hard of hearing and are sign-language users communicate in a different language. This means that English is not their first

language. Their needs are not automatically met by providing written information; some will have a level of literacy in English that is below average.

To address low literacy levels consider providing written information in an easier to understand language and in Easy Read format. It is important that you consider providing written information as visual alternatives. This includes creating signed content on websites or British or Irish Sign language DVDs. It is important that you check if it is British or Irish Sign Language that is required.

Consider the use of SMS text message facility for provision of short pieces of information.

Arrangements for producing materials in alternative formats

Individual Health and Social Care organisations should ensure that organisations or individuals selected to produce materials in alternative formats for people who are deaf or hard of hearing, such as British or Irish sign language DVDs, are selected in accordance with HSC Procurement requirements.

For further information on how to procure such formats, contact: Janet Hall, NIPEC's Corporate Services Manager at 0300 300 0066 or at janet.hall@nipec.hscni.net

Where to go for further support and advice

If you are developing materials and you want to engage with people who are deaf or hard of hearing you can check out contact details for organisations representing people who are deaf or hard of hearing in the following resource: 'Signpost to Support Networks in the Community' www.hscbusiness.hscni.net/services/1801.htm

Making information accessible to people with dyslexia or literacy difficulties

Make sure you adhere to the General Guidelines presented in Part 1. In addition, the following is important:

- Make sure you structure your text into short chunks of text. Clearly separate these.
- Consider including a glossary to explain any terms that you are using.
- Use words and concepts consistently throughout a document.
- If you are using illustrations, place them at the end of a paragraph. Don't put them in the middle of them.

- Avoid letting text run over illustrations.
- Avoid dark colours as background, especially blue and purple. They make reading harder.
- Some people with dyslexia find it easier to read if text is presented against a cream background or a pale pastel colour.
- When using difficult words, repetition can be very helpful.

Check the readability of your text. You can use the following website to calculate its so-called 'SMOG' index (Simple Measure of Gobbledegook):
http://www.readabilityformulas.com/smog-readability-formula.php

Sources

Mencap: Make it clear. A guide to making easy read information.
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NIACE (National Institute of Adult Continuing Education) (2009): Readability - how to produce clear written materials for a range of readers.
http://www.learningandwork.org.uk/resource/readability/

RNIB (Royal National Institute for the Blind) (2006): See it right.

SCIE (Social Care Institute for Excellence) (2005): Accessibility guidelines for producing information
www.scie.org.uk/publications

Scottish Accessible Information Forum
http://www.saifscotland.org.uk/