



Draft Accessible Communications Policy

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1.0 Introduction

- 1.1 This policy has been developed to help to ensure that the Council has a clear and consistent approach to the provision of accessible information and communication support, including interpretation and translation.

2.0 Policy Aims & Objectives

- 2.1 **Policy Aim:** To ensure that Council information is presented in an accessible way, and where appropriate in a range of formats and languages which are tailored to the needs of the intended audience.

2.2 Policy Objectives:

- To promote inclusive communication to enable people with communication support needs to access information more effectively
- To ensure that the translation and interpretation needs for all of our people are met
- To increase awareness among Council staff or service users who have increased communication needs
- To mainstream the accessibility of information to help ensure that all service users have their communication needs met
- To establish good practice in order to benefit Council services in the future as well as now

3.0 Underpinning Legislation

- 3.1 The Disability Discrimination Act 1995 prohibits discrimination and requires local authorities to make reasonable adjustments to ensure that services are accessible. This includes Council communications.
- 3.2 Sections 6.1 and 7.3 of this policy contains examples of alternatives formats and translations which are considered as examples of reasonable adjustments.

- 3.3 Since 2006, public authorities must also pay due regard to the need:
- To promote positive attitudes towards disabled people, and
 - To encourage participation by disabled people in public life.
- 3.4 Section 75 of the Northern Ireland Act (1998) requires public authorities to have due regard to promote equality of opportunity across a number of grounds, including disability.
- 3.5 The Human Rights Act (1998) also makes human rights a part of local legislation and means that public authorities must respect, protect and uphold the rights of all service users.
- 3.6 The United Nations Convention on the Rights of Persons with Disabilities (UNCRPD) provides specific human rights protections for persons with disabilities, including accessibility of information and communication. The Convention states that Persons with disabilities have the right to the enjoyment of the highest attainable standard of health without discrimination on the basis of disability.
- 3.7 The Public Sector Bodies (Websites and Mobile Applications) (No. 2) Accessibility Regulations 2018 builds on existing obligations to people who have a disability under the Disability Discrimination Act 1995 in Northern Ireland. Subject to regulation 7, public sector bodies must comply with the accessibility requirements included in these regulations.

4.0 Policy Scope

- 4.1 It is important that documents and information published by Mid Ulster District Council are accessible and inclusive. This includes documents and information authored and produced in-house and commissioned from external agencies. This ensures that information can be read or received and understood by as many people as possible. It reduces – but does not remove – the need for alternative formats to be produced. Therefore, this policy relates to all of the Council’s communications specifically:

- Written/printed communications
- Face-to-face communications
- Digital communications

4.2 Each of these areas are examined in turn to consider the varying communication needs of our service users:

Written/Printed Communications

4.3 If a document is initially designed using the core accessibility principles (see Appendix A for guidance), the information will already be accessible to a greater number of people and may reduce demand for alternative formats. Structured planning will also make best use of resources available and will reduce duplication of work across Council departments

4.4 Structured planning can be carried out by:

- Carrying out research and identifying the target audience at the commissioning stage
- Considering how to reach audience members by using a mix of channels and appropriate formats, considering any costs.

4.5 This information can be made available in alternative formats, such as easy read or large print, and in alternative languages on request. Please contact the Council's Corporate Policy & Equality Officer with your request. The Council's Accessible Communication Statement is included as Appendix D.

Face-to-Face Communications

4.6 This policy is compatible with processes in place across Mid Ulster District Council, such as the 'Just A Minute' Initiative. The Council's Equality Scheme also requires preparation work to take place in relation to all projects/plans and strategies. Within that context, the scope of this policy extends to considering the communication requirements of the audience at the planning stage of

projects/plans and strategies. This is necessary in order to ensure that everyone's communication needs are considered proactively and within the timeframe that is required by the Council's Equality Scheme. Appendix A sets out specific guidance for face to face communication.

Digital Communications

- 4.7 All electronic documents, including all documents published on Mid Ulster District Council's website or intranet should adhere to the accessibility guidance set out in Council's protocols for accessible communication (Appendix A).
- 4.8 The Council's websites must, by default, achieve a high level of accessibility and any specifications which commission web-based services, including those provided by 3rd party suppliers, must incorporate accessibility requirements at the planning stage.
- 4.9 Appendix C sets out specific guidance for accessible digital communications.
- 4.10 It is anticipated that the following groups are most likely to be directly impacted upon by the policy:
- People who are blind or have visual loss
 - People who are deaf or have hearing loss
 - People who are deafblind
 - People who have a learning disability
 - People who have limited or no English
- 4.11 The following groups may also be affected by the policy:
- People with aphasia
 - People with a mental health condition which affects their ability to communicate
 - People with dyslexia
 - People with autism
- 4.12 Please note that these categories may not represent all of the groups who may be affected by additional communication needs and requirements.

5.0 Linkage to Our Corporate Plan

- 5.1 Referring to Mid Ulster District Council's Corporate Plan 2020-2024, this policy contributes toward the delivery of Corporate Theme 2 (Service Delivery).

6.0 Submitting Requests for Alternative Formats

- 6.1 The Council shall consider all requests to provide communications in a range of alternative formats. Alternative formats can include documents being made available in large-print, on disk, on audiocassette and in Braille and in other languages upon request. Requests should be made to the Corporate Policy & Equality Officer.
- 6.2 Council Officers who receive the request should make the person submitting the request aware that there are waiting times in place for request for some types of translation services.
- 6.3 All Council staff must take responsibility for their own actions and how their communication methods may affect others. Staff should be flexible in the way they communicate and deliver services. Staff should always be mindful that different people will require different types of support to access Council services effectively.

7. Types of Translations and Interpretations

- 7.1 The Council shall consider all requests from individuals and/or their carer to provide the translation or interpretation services that they require. The customers preferred method of communication should be noted and where possible/appropriate their translation or interpretation services will be met.
- 7.2 The Council will provide the following types of translations and interpretation:
- Telephone Interpreting
 - Face to Face Language Interpreting
 - Written Language Translations for correspondence and corporate documentation
 - Sign Language

- 7.3 Details on each of the types of translations and interpretation are set out below:

Telephone Interpreting

Telephone interpreting gives staff and customers instant access to an interpreter. Mid Ulster Council has a telephone interpretation service available across all civic and leisure facilities. It can also be accessed from a mobile phone if necessary. A guide to using the Telephone Interpretation Service can be found at the reception area of the civic and leisure facilities.

Face to Face Interpreting

There will be occasions where it is more practical and helpful to use face to face interpretation. For example face to face interpretation can be more practical when dealing with complex issues or form filling and would be more appropriate than using Language Line.

It is important to note that a bilingual child should never be used as an interpreter. However, it is acceptable to use an adult friend or family member as an interpreter, where the client has requested this. However, the client must be made aware that an interpreting service is available. Ask approval from your Line Manager to use a face to face interpreter. Then contact the Corporate Policy & Equality who will book the interpreter. It is recommended to request an interpreter at least twelve working days prior to the appointment date. Please provide the information set out in Appendix X.

Translations

Council will provide translations for operational use e.g. letters to customers. Copies of all documents translated should be retained so that they are readily available for general use, and to avoid the same documents being repeatedly translated and paid for. Council's website functionality also allows the website to be translated into various languages (see Appendix F).

Sign Language

Northern Ireland recognises both British Sign Language (BSL) and Irish Sign Language (ISL). They are two very different and distinct languages and it is therefore very important to find out which type of interpreter is needed. It is estimated that there are around 4,300 BSL users and approximately 1,500 ISL users in Northern Ireland.

As demand for BSL/English and ISL/English interpreters often exceeds availability you should consider interpreters availability. Quite often interpreters are booked weeks in advance. Therefore before you set a date and time set for an appointment, you should contact the Corporate Policy and Equality Officer to book an interpreter. When requesting a Sign Language interpreter the information should be provided as per the request form in Appendix 19.

8.0 Roles and Responsibilities

- 8.1 **Chief Executive:** has ultimate authority with regard to the implementation of the Equality Scheme. This policy is an outworking of the Equality Scheme to ensure equality of opportunity in relation to how the Council provides accessible communication.
- 8.2 **Departments:** are responsible for; the day to day implementation of this policy and ensuring a high quality service is provided to all customers including people with additional communication requirements.
- 8.3 **Staff:** All Council staff must take responsibility for ensuring that how they are communicating with customers takes into account that different people will have different communication needs. Staff should also ensure that accessibility is considered at the beginning of the process.

9.0 Impact Assessment

9.1 Equality Screening & Impact

The policy has equality screened in accordance with the council's screening process. No impact was identified.

9.2 Staff & Financial Resources

No issues have been identified which would significantly impact on the council's resources and delivery of its business as a result of this policy being implemented. Many adjustments to make communications accessible can be completed with little or no cost attached.

Rural Needs Implications

- 9.3 This is an internal policy. A Rural Needs Impact Assessment is currently considered relevant to the policy's development or implementation .

10.0 Support and Advice

- 10.1 Advice and guidance on the implementation of this should be sought from the Corporate Policy & Equality Officer.

11.0 Communication

- 11.1 Democratic Services is responsible for the communication and delivery of this policy.

12.0 Monitoring and Review

- 12.1 Implementation of this policy will be monitored and a formal review undertaken 48 months from its effective date.

Appendix A- Protocols for Accessible Written/Printed Communications

Fonts

- Document text size should be a minimum of 12 point, preferably 14 point.
- Use Arial font. This is Council's agreed font for internally produced documents.
- Avoid italics, underlining, simulated handwriting, blocks of capitalised letters or anything styled.

Design and Layout

- Use a simple, clear and uncluttered design and layout.
- All body text should be left aligned. Avoid aligning text or to the right or justifying text.
- All text should be the same orientation on the page.
- Use bold sparingly, only highlight a few words rather than a paragraph.
- Leading (space between lines) should not be too cramped, preferably 1.5-line spacing.
- Text should never be placed over an image or fitted around an image.
- The contrast between the text and background should be as high as possible.
- Space between columns of text should be large enough to be distinct.
- Colour text/fonts should not be used.
- Do not use abbreviation or acronyms.
- Keep your words, sentences and paragraphs short and simple.
- Use page numbers and headings consistently.

Images:

- Images can help communicate messages and support understanding.
- Make sure images are as big and as clear as possible.
- Text should never be placed over an image or fitted around an image.
- Images in colour are preferable.
- Authentic photographs of real people or places are preferable.
- Put a clear picture next to accompanying text.

Appendix B- Guidance for Face to Face Communication

- Make sure you have the person's attention before trying to communicate with them.
- Identify yourself clearly. Say who you are and what you do – it may be more relevant to explain your reason for seeing the person rather than your job title.
- Check that you are in the best position to communicate, usually this will be facing the person, but consider whether seated or standing is more appropriate. Communication at eye level is usually easiest so if you are speaking to a wheelchair user consider sitting down if possible.
- Find a suitable place to talk, with good lighting and away from noise and distractions.
- Speak clearly but do not shout.
- Keep your face and lips visible – do not cover your mouth with clothing, a hand or your hair. If a member of staff is concerned about religious expression they should discuss this with their manager in advance.
- Use gestures and facial expressions to support what you are saying.
- If necessary, repeat phrases, re-phrase the sentence or use simpler words or phrases.
- Use plain, direct language and avoid using figures of speech
- Check if the person has understood what you are saying. Look for visual clues as well as asking if they have understood.
- Encourage people to ask questions or request further information. Ask if they would like anything in writing as a reminder or reference.
- Try different ways of getting your point across. For example, writing things down, drawing or using symbols or objects to support your point.
- Keep messages short, clear and to the point.
- Provide a pen and paper to enable the person to write or draw key points themselves.
- Try to keep communication and documents consistent, as repetition will support effective communication.
- Recap the key points at the end of the conversation.

Appendix C- Guidance for Digital Communication

- Writing for digital channels should, where applicable, meet the same standards as writing for print.
- Photographs and video content should, where possible, be captioned.
- Appropriate measures should be taken to assist accessibility and screen reading technology, including the use of alt text tags for images, meaningful hyperlinks (avoid hyperlinking phrases such as 'click here') and camel case (capitalisation) in hashtags where more than 1 word is used.
- **Documents for Download**
 - Traditionally documents for download have been made available as PDFs. However, information published in a PDF is harder to find, use and maintain and do not work well with assistive technologies like screen readers. This means that unless they are created with sufficient care, PDFs often fail to meet accessibility standards.
 - The Council's approach to managing this aspect of accessibility is to minimise the use of PDFs and to publish them only where:
 - there is a requirement to do so (for example, to meet a statutory obligation)
 - and*
 - where the PDF has been checked and meets accessibility standards.
 - As we cannot stand over PDFs produced by external organisations, rather than hosting them directly on our websites, we will instead, where appropriate, link out to the external organisation's website.
 - If there is a requirement for the Council to host directly a PDF produced by an external organisation, we will ask the organisation to provide the PDF in an accessible format.
 - Often information contained in a PDF can simply be presented on a webpage, negating the need for a download.
 - Where a document will be required to download as a PDF, the rule is to keep your original document (most often produced in word or excel) as simple as possible:

- Avoid all-caps text, italics and underlining.
- Make sure text is left-aligned and not justified.
- Keep the layout simple. Continuous text is best.
- Only use tables for data (not for headings or to distinguish one block of text from another) and keep the number of rows and columns equal (that is, avoid splitting or merging cells).
- Don't use graphics, images or charts unless necessary
- Never use an image which contains text.
- If you need to use an image or a chart, you must describe it using 'alternative text (alt text) which is essentially a text alternative to non-text content.
- Do not use bold to mark up subheadings. Use styles to create a hierarchy of headings: 'heading 1', 'heading 2' and so on.

You can find comprehensive advice via [gov.uk – publishing accessible documents](#).

Appendix D- Accessible Communication Statement

All Mid Ulster District Council publications should include the 'accessible communication statement' in a prominent position, as follows:

'This information can be made available in alternative formats, such as audio, braille, easy read or large print and may be provided in alternative languages, upon request. Please contact Mid Ulster District Council's Corporate Policy & Equality Officer on 03000 132 132 Ex 24612 or via ann.mcaleer@midulstercouncil.org'

The statement should be in no less than 12 point, in an obvious place, such as on the front cover page. For longer documents, it would be appropriate to duplicate the statement on the back cover as well as at the beginning.

Appendix E: Face to Face Interpreter

Name and contact number of the member of staff requesting the service:

Language required:

Is the preference for the interpreter be male or female:

Date/time/location of the booking:

Approx length of booking:

Brief details about the purpose of the interview:

Appendix F: Requesting a Translation

Name and contact number of the member of staff requesting the service:

Language required:

Should the interpreter be male or female:

Date/time/location of the booking:

Approx length of interview:

Brief details about the purpose of the translation:

Appendix G: Sign Language Interpreters

Name and contact number of the member of staff requesting the service:

Sign Language required (BSL* or ISL):

Should the interpreter be male or female:

Date/time/location of interview (remember the recommended minimum notice for booking an interpreter is 2 – 4 weeks)

Approx length of interview:

Brief details about the purpose of the interview:

(*British Sign Language or Irish Signage Language)

Appendix H: Telephone Translation

The process to receive telephone interpretation is set out below for staff member:

1. Dial Language Line using the usual number. Use your usual Access Code (the Access Code is available from reception staff).
2. Request the language required and wait to be connected to an interpreter as usual.
3. Once the interpreter is connected, let them know that you would like to make a dial-out.
4. Give the interpreter the persons phone number and brief the interpreter on what you would like them to say once the patient answers their phone.
5. The interpreter will make the call and ensure that all parties are connected.
6. The interpreter will carry-out the introduction and you can conduct your conversation using translation interpretation.