



Review Sheet



Last
Reviewed
23 Feb 2026



Last
Amended
23 Feb 2026



This policy will be reviewed as needs require or at the following interval:
Annual

Business Impact:



Changes are important, but urgent implementation is not required, incorporate into your existing workflow.

Reason for this Review:

Best practice

Changes Made:

Yes

Summary:

This policy has been reviewed with a new section on reasonable adjustments which included the NCRS flag (5.11). The policy remains appropriate and supports staff to understand and implement the principles of the NHS Accessible Information Standard. Underpinning Knowledge and Further Reading links have been reviewed and updated where applicable.

Relevant Legislation:

- The Care Act 2014
- Equality Act 2010
- The Health and Social Care Act 2008 (Regulated Activities) Regulations 2014
- Mental Capacity Act 2005
- Access to Health Records Act 1990
- Data Protection Act 2018
- UK GDPR
- Public Sector Bodies (Websites and Mobile Applications) (No. 2) Accessibility Regulations 2018

Underpinning Knowledge:

- Author: GOV UK, (2018), The Public Sector Bodies (Websites and Mobile Applications) Accessibility Regulations 2018 [Online] Available from: <https://www.legislation.gov.uk/uksi/2018/852/contents/made> [Accessed: 23/02/2026]
- Author: NHS England, (2025), Accessible Information Standard [Online] Available from: <https://www.england.nhs.uk/accessible-information-standard/> [Accessed: 23/02/2026]
- Author: NHS England, (2025), Accessible Information Standard Implementation Guidance [Online] Available from: <https://www.england.nhs.uk/long-read/accessible-information-standard-implementation-guidance/> [Accessed: 23/02/2026]
- Author: CQC, (2025), Meeting the Accessible Information Standard [Online] Available from: <https://www.cqc.org.uk/guidance-providers/meeting-accessible-information-standard> [Accessed: 23/02/2026]

**Headway Shropshire**

Holsworth Park, Oxon Business Park Shrewsbury Shropshire SY3 5HJ

	• Author: GOV.UK, (2024), Understanding Accessibility Requirements for Public Sector Bodies [Online] Available from: https://www.gov.uk/guidance/accessibility-requirements-for-public-sector-websites-and-apps [Accessed: 23/02/2026] • Author: ICO, (2025), UK GDPR Guidance and Resources [Online] Available from: https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/ [Accessed: 23/02/2026]
Suggested Action:	• Encourage sharing the policy through the use of the QCS App
Equality Impact Assessment:	QCS have undertaken an equality analysis during the review of this policy. This statement is a written record that demonstrates that we have shown due regard to the need to eliminate unlawful discrimination, advance equality of opportunity and foster good relations with respect to the characteristics protected by equality law.

Quality Compliance Systems Ltd
Headway Shropshire
Downloaded: 9 September 2026
Hattie Beardsley



1. Purpose

1.1

To make sure that Clients (and those important to them) who have a disability, impairment or sensory loss, get information that they can access, understand and receive any communication support that they need from Headway Shropshire.

1.2

Key Question

Quality Statements

CARING	QSC2: Treating people as individuals
EFFECTIVE	QSE3: How staff, teams & services work together
RESPONSIVE	QSR1: Person-centred care
SAFE	QSS3: Safeguarding
WELL-LED	QSW7: Learning, improvement and innovation

1.3 Relevant Legislation

- The Care Act 2014
- Equality Act 2010
- The Health and Social Care Act 2008 (Regulated Activities) Regulations 2014
- Mental Capacity Act 2005
- Access to Health Records Act 1990
- Data Protection Act 2018
- UK GDPR
- Public Sector Bodies (Websites and Mobile Applications) (No. 2) Accessibility Regulations 2018



2. Scope

2.1 Roles Affected:

- All Staff

2.2 People Affected:

- Clients
- Family
- Visitors

2.3 Stakeholders Affected:

- Family
- Advocates
- Representatives



Headway Shropshire

Holsworth Park, Oxon Business Park Shrewsbury Shropshire SY3 5HJ

- Commissioners
- External health professionals
- Local Authority
- NHS



3. Objectives

3.1

To ensure that Headway Shropshire complies with the NHS Accessible Information Standard, and that staff at Headway Shropshire consider how they will apply the standard in a clear, consistent, transparent and fair way.

3.2

For Headway Shropshire to have a clear, consistent, transparent and fair approach to the provision of accessible, inclusive information and communication support to all.



4. Policy

4.1

All staff at Headway Shropshire have a responsibility to make information accessible and inclusive.

4.2

Headway Shropshire will comply fully with the NHS England Accessible Information Standard and will perform the following six implementation steps:

- **Ask:** Find out if people have communication and information needs
- **Record:** Record those needs in a clear and standardised way in electronic or paper based systems
- **Flag:** Use alert systems to generate specific formats or to clearly indicate needs to others
- **Share:** Include records as part of data sharing and treatment and referral processes
- **Act:** Take steps to ensure people's information and communications needs are met
- **Review:** Regularly review needs and ensure records are up to date

4.3

Staff will have a working knowledge of the NHS England Accessible Information Standard, and Headway Shropshire will be able to demonstrate compliance through audit and quality assurance processes.

4.4

In line with UK GDPR, data protection legislation, Headway Shropshire will enable Clients to access their records when requested, and this includes the right to review and amend their documented communication preferences.

4.5

Where Clients are unable to provide consent in relation to their wishes with sharing of information, all decisions regarding this area will be made in line with the Mental Capacity Act 2005 and best interests requirements.

**Headway Shropshire**

Holsworth Park, Oxon Business Park Shrewsbury Shropshire SY3 5HJ

4.6

Headway Shropshire will also comply with the Accessibility Regulations that came into force for public sector bodies in 2018 and require reasonable adjustments to be made to websites and mobile apps for those with disabilities to ensure that they remain accessible.

The regulations require a service's website to comply with [WCAG2.1 AA](#) by:

- Ensuring that the website is 'perceivable, operable, understandable and robust'
- Having an accessibility statement available on the website

Although some services may be exempt from the regulations (full government guidance can be referred to [here](#)), Headway Shropshire recognises it has an obligation to ensure that reasonable adjustments are in place for disabled people.

**5. Procedure****5.1****Steps to the Accessible Standard**

There are six basic steps which make up the Accessible Information Standard:

- **Ask:** Find out if people have communication and information needs
- **Record:** Record those needs in a clear and standardised way in electronic or paper based systems
- **Flag:** Use alert systems to generate specific formats or to clearly indicate needs to others
- **Share:** Include records as part of data sharing and treatment and referral processes
- **Act:** Take steps to ensure people's information and communications needs are met
- **Review:** Regularly review needs and ensure records are up to date

5.2**Step 1 - Ask**

At the earliest opportunity, e.g. when an enquiry for a Care service is raised, receiving staff must establish any communication needs or wishes in a timely manner.

Pre-assessment

Before commencing any Care, an assessment will be completed that identifies the communication needs and wishes of the Client. This information gathering will include identifying how the Client manages this and what support they will need from staff in order to enable effective communication.

Before commencing Care, Amanda Vincent must determine that Headway Shropshire can meet the communication needs of the Client. Staff must avoid making any assumptions about Clients' communication needs, and must take care to record people's communication needs specifically and separately from any recording of disability or other protected characteristic status.

5.3**Ongoing Assessment**

As part of the Care Plan cycle, assessments will be reviewed in accordance with locally agreed timescales or as a Client's condition changes. As part of this, staff will revisit and



Headway Shropshire

Holsworth Park, Oxon Business Park Shrewsbury Shropshire SY3 5HJ

identify any new communication needs and support accordingly.

Amanda Vincent will consider how to promote enabling all individuals accessing Headway Shropshire to express their communication needs and wishes.

There are a range of resources (e.g. posters and leaflets) that can be accessed via NHS England that can help to raise awareness that Headway Shropshire will accommodate different communication preferences (refer to the Further Reading section of this policy).

5.4

Step 2 - Record

Recording of communication needs and preferences will be highly visible and clear on paper formats (i.e. jargon free, in a simple language). Where electronic systems are used, coding must be in accordance with the defined terminology and assurance will be gained that persons receiving this shared information understand it.

5.5

Step 3 - Alert/ Flag/ Highlight

Staff at Headway Shropshire must have systems in place to ensure that records (electronic or paper-based) clearly flag that the Client has a recorded communication need - they will be highly visible and prompt staff to take action.

Where facilities are in place for automatically generated correspondence, alerts will pick up the requirement for alternative formats. Staff responsible for overseeing standard print letter releases to Clients must have systems in place to not send these where it would be inappropriate or inaccessible for that person. Headway Shropshire will investigate and learn from any incidents of this nature.

5.6

Step 4 - Share

Consent will be gained from the Client who has identified specific communication preferences and needs in relation to sharing this information. Any limitations to this must also be documented and clarity provided as to what information can be shared, with whom, in what circumstances, and for what purposes.

Where consent cannot be obtained due to reduced capacity, staff should refer to the Mental Capacity Act (MCA) 2005 Policy and Procedure of Headway Shropshire and best interest decisions made in line with the code of practice.

Existing internal and external communication systems such as the referral, transfer of Care and handover processes will include reference to communication support required for Clients.

5.7

Step 5 - Act

Staff must be aware of how to adapt their own communication styles to meet the needs of a Client, and they must also be competent with the use of any techniques or aids used by Clients.

It is acknowledged that it may take time to establish communication needs from Clients that choose to not disclose this information, and they must be encouraged to discuss their needs with staff.

Clients who use limited or no English, and those who use British Sign Language (BSL) or the deaf-blind manual alphabet, will have access to a professional interpreter. Staff will



Headway Shropshire

Holsworth Park, Oxon Business Park Shrewsbury Shropshire SY3 5HJ

support the Client to access this and will work with any advice and support offered by the interpreter.

Where staff are required to support Clients to source an interpreter or communication professional, this must be based on the following considerations:

- Qualifications
- DBS clearance
- Professional code of conduct
- Experience
- Preference of the Client (e.g. in relation to gender)
- Specialist skills needed

Any concerns in relation to the suitability or practice of the interpreter will be discussed with Amanda Vincent.

5.8

Step 6 - Review

Headway Shropshire will regularly review Clients' accessible information and communication needs to ensure they remain accurate and appropriate.

This review will occur in line with the Care Plan review cycle at Headway Shropshire, or sooner if there is a significant change in the Client's health, communication ability, or care and support setting.

Any updates must be clearly documented in the Client's Care Plan and promptly acted upon to maintain effective and equitable communication.

5.9

Environment

Although the Accessible Information Standard does not include environmental or facilities matters, some aspects apply to Clients with a disability, impairment or sensory loss, in order to facilitate communication.

Staff must always consider whether some rooms are 'better' than others for people with communication needs, e.g. less clutter, improved lighting, soundproof. As part of the Care Plan process, the environment must be considered and appropriate locations detailed in the Care Plan where specific rooms might provide better support to facilitate communication.

Staff will consider lighting, in particular where lip reading is vital for the Client.

Amanda Vincent will accommodate communication aids that support individuals with communication, such as loop systems, in agreement and review with Headway Shropshire.

5.10

Conversion of Format

Amanda Vincent must consider in advance how to facilitate the conversion of key documents, policies and procedures in a timely manner. Amanda Vincent will identify which communication formats can be used or produced within Headway Shropshire, for example, email and text message (for people who are deaf as an alternative to telephone, and for people who are blind as an alternative to printed information), and large print.

Staff should also refer to the Recite Me tool within QCS Compliance Centre, which will support with the conversion of policies and resources into different languages, large print

**Headway Shropshire**

Holsworth Park, Oxon Business Park Shrewsbury Shropshire SY3 5HJ

and audio amongst other available functions.

A local suite of support services and points of contact will be made available in readiness for accessing specific communication requirements that cannot be met within Headway Shropshire. Amanda Vincent will consider how needs can be met by the use of remote, virtual, digital and telecommunications solutions, as well as paper format.

5.11**Reasonable Adjustment Flag (NCRS)**

Where Headway Shropshire has access to the National Care Records Service (NCRS), reasonable adjustments must be recorded using the NHS Reasonable Adjustment Flag in addition to the Client's Care Plan.

This Reasonable Adjustment Flag enables health and social care professionals involved in the Client's direct care and support to view key information about required adjustments, reducing the need for Clients to repeat their needs and supporting compliance with the Equality Act 2010 and the NHS England Accessible Information Standard (DAPB1605).

When to Record a Reasonable Adjustment Flag

Staff must consider completion of the flag when:

- The Client has a disability as defined under the Equality Act 2010
- The Client has a communication need identified under the Accessible Information Standard
- The Client requests an adjustment
- An assessment identifies a barrier to accessing care, support or health and social care services

Create/Update the NCRS Reasonable Adjustment Flag

Where Headway Shropshire has authorised access to NCRS:

- Log into the National Care Records Service
- Search for the Client using NHS number and demographic details.
- Select "Reasonable Adjustment Flag".
- Record:
 - Type of impairment or need (using nationally defined categories)
 - Specific reasonable adjustments required
 - Review date (if applicable)
- Save and confirm submission

Review

Adjustments must be reviewed:

- At formal Client care and support reviews
- If Clients' needs change
- At least annually

Guide to Using the Reasonable Adjustment Flag in NCRS

<https://digital.nhs.uk/services/reasonable-adjustment-flag/guide-to-using-the-reasonable-adjustment-flag-in-ncrs>

5.12

Staff can refer to the Supporting Communication and Sensory Needs Policy and Procedure of Headway Shropshire for practical support and procedures that can extend to any person

**Headway Shropshire**

Holsworth Park, Oxon Business Park Shrewsbury Shropshire SY3 5HJ

accessing Headway Shropshire.

Time should be factored into accommodating communication needs, as some Clients may need longer periods of time to process information than others.

5.13**Training and Education**

New staff joining Headway Shropshire will receive an induction that includes communication. For new Care Workers, they will also be required to complete the Care Certificate which includes standards around communication.

Ongoing, staff will be encouraged to develop their learning further. This will be identified through supervisions and appraisals, and by training needs analysis.

5.14**The self-assessment framework**

Headway Shropshire will measure its compliance against the set of performance measures by using the [self-assessment framework](#).

There are 8 steps to completing the framework

- **Step 1:** Understand the Accessible Information Standard
- **Step 2:** Assemble a self-assessment team
- **Step 3:** Review current practices
- **Step 4:** Conduct staff and user surveys
- **Step 5:** Undertake gap analysis
- **Step 6:** Develop an action plan
- **Step 7:** Implement the plan and monitor
- **Step 8:** Deliver continuous improvement

NHS England states that organisations should be in a position to annually publish their compliance with the 2025 version by March 2027.

5.15**Audit and Review**

Amanda Vincent will ensure that processes are in place to make sure that information recorded is current and accurate.

Record keeping audit processes will include a review of the communication preferences of Clients. Overarching quality assurance checks of Headway Shropshire will identify meeting the needs of any Client accessing Headway Shropshire. Any findings of discrepancy will be immediately acted upon and reflected upon to ensure the risk of reoccurrence is reduced.

Clients will be supported to provide feedback about their experiences, with information received by Headway Shropshire in the most appropriate forum. Information received will be acted upon as part of the continuous improvement cycle.



6. Definitions

6.1 Accessible Information

- Information which is able to be read or received and understood by the individual or group for which it is intended

6.2 Alternative Format

- Information provided in an alternative to standard printed or handwritten English, e.g. audio, braille or large print

6.3 Deafblind

- Deafblindness is a combined hearing and sight loss that causes problems with mobility, communication and access to information



7. Key Facts - Professionals

Professionals providing this service should be aware of the following:

- Effective information and communication are vital components of a person-centred approach to care and support
- The Accessible Information Standard was introduced to standardise how organisations consistently meet communication needs of individuals
- There are 6 steps to the Accessible Information Standard; these are Ask, Record, Flag, Share, Act and Review
- The standard dovetails alongside equality and diversity and data protection legislation
- The standard is mandatory for NHS and social care providers



8. Key Facts - People Affected by The Service

People affected by this service should be aware of the following:

- Headway Shropshire recognises that you may have specific communication requirements and will ensure this is accommodated
- Headway Shropshire will ensure information is presented in an accessible way and, where appropriate, in a range of languages and formats that are easily used and understood
- Headway Shropshire will seek your feedback on information sharing as a means of improving its service



Further Reading

NHS England - Guide to Using the Reasonable Adjustment Flag in NCRS:

<https://digital.nhs.uk/services/reasonable-adjustment-flag/guide-to-using-the-reasonable-adjustment-flag-in-ncrs>

Skills for Care - Care Certificate - Communication:

<https://www.skillsforcare.org.uk/Developing-your-workforce/Care-Certificate/Care-Certificate.aspx>

National Register of Communication Professionals Working with Deaf and Deafblind People:

<https://www.nrcpd.org.uk>

National Register of Public Service Interpreters:

<https://www.nrpsi.org.uk/>

The Royal National Institute of Blind people and Sense can offer further information about braille and communication formats:

RNIB - Braille: Tactile Codes:

<https://www.rnib.org.uk/practical-help/reading/braille-and-moon-tactile-codes>

Sense - Total Communication:

<https://www.sense.org.uk/get-support/information-and-advice/communication/total-communication/>

Action on hearing loss and SignHealth can provide resources for hearing loss:

RNID - Hearing Loss:

<https://rnid.org.uk/information-and-support/hearing-loss/>

SignHealth - Who uses British Sign Language (BSL)?

<https://www.signhealth.org.uk/about-deafness/sign-language/>

GOV.UK - Guidance - Accessible Communication Formats:

<https://www.gov.uk/government/publications/inclusive-communication/accessible-communication-formats>

The Stroke Association has produced an animated guide to communicating with people with aphasia, as well as a guidance sheet:

The Stroke Association - Aphasia Etiquette:

<https://www.youtube.com/watch?v=hTh86NoQh7Q>

**The Stroke Association - Communication Problems After a Stroke:**

<https://www.stroke.org.uk/resources/communication-problems-after-stroke>

Please refer to the QCS Resource Centre for useful Easy Read support, which includes:

- How to Create Easy Read Documents
- QCS Easy Read Template
- Accessible Information Flag

Please refer to the 'Recite Me' function within QCS Compliance Centre which can be accessed by clicking on the person icon.

**Outstanding Practice**

To be "outstanding" in this policy area you could provide evidence that:

- Different formats of key policies such as the Complaints, Suggestions and Compliments Policy and Procedure are readily available for access
- Headway Shropshire actively advertises to any visitors that it can accommodate different communication needs and actively supports a culture that encourages people to disclose their needs
- Staff receive additional training in relation to communication skills, such as lipreading, sign language, use of electronic communication aids.
- Records clearly state communication needs and audits demonstrate adherence to the standard
- Any feedback and suggestions received in relation to communication within Headway Shropshire is acted on in a timely manner as part of quality assurance processes
- The wide understanding of the policy is enabled by proactive use of the QCS App

**Forms**

The following forms are included as part of this policy:

Title of form	When would the form be used?	Created by
My Accessible Information Flag	To support the requirements of the Accessible Information Standard	QCS



Accessible Information Standard

NAME

Communicating Effectively

Explain here how I communicate; My First Language, Verbally, Signs, Symbols and Pictures etc.



Communication Aids

Such as Pics of PECS, Widgets, Signs and Symbols

These are located here:



Support to Communicate Effectively

Advocate, Interpreter, Makaton, BSL, My Communication Passport

You will find these here:



Giving Information

Signs and Symbols, Audio Versions, Easy Read, Large Print, Braille etc.



Communication Support Plan

Give a brief outline here of what is stated in the plan

You can locate this here:



Access and Sharing Information

List here who can share and access information about me. Where to find my consent to share information forms.

You can locate my consent here:

Completed By

Date

This Flag supports compliance with the Accessible Information Standards Six Steps.

Ask: find out if people have communication and information needs.

Record: record those needs in a clear and standardised way in electronic or paper based systems.

Flag: use alert systems to generate specific formats or to clearly indicate needs to others.

Share: include records as part of data sharing and treatment and referral processes.

Act: take steps to ensure people's information and communications needs are met.

Review: regularly review needs and ensure records are up to date.