Accessibility Policy

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Contents

This policy can be made available in appropriate languages on request and in different formats such as in large print, audio-format such as compact disc and Braille.

Section 1: Introduction

Orkney Islands Council has developed this accessibility policy for several reasons. The Council is referred to generally as "we" throughout this document.

Firstly, this policy is important to meet legal and good practice standards. Details of these legal and good practice standards are explained in Section 3.

Secondly, this policy describes how we ensure that housing services are accessible to service users. The word "service user" refers to tenants and other people who use our service, for example, applicants for housing. And making services accessible simply means ensuring that housing services are tailored to the specific needs of individual people.

This commitment, it is emphasised, is an important part of our equality strategy; indeed, providing accessible services is needed to fulfil equality objectives. For example, in our equality policy, we are committed to ensuring that public documentation is produced in a range of formats that are accessible to the needs of individual service users.

This document has been produced by Housing Services and is intended to ensure that we:

"Act in a manner which encourages equal opportunities and in particular the observance of the requirements of the law for the time being related to equal opportunities" (Housing (Scotland) Act 2010, Section 39).

In addition we aim to ensure that we meet the Scottish Social Housing Charter's Equalities outcome and standard in respect of equalities:

Social landlords perform all aspects of their housing services so that:

- Every tenant and other customer has their individual needs recognised, is treated fairly and with respect, and receives fair access to housing and housing services.

This outcome describes what social landlords, by complying with equalities legislation, should achieve for all tenants and other customers regardless of age, disability, gender, reassignment, marriage and civil partnership, race, religion or belief, sex, or sexual orientation. It includes landlords finding ways of understanding the needs of different customers and delivering services that recognise and meet these needs.

Thirdly, this policy is important to meet the Care Inspectorate's National Care Standards in respect of equality and diversity which ensures that our service users can:

- Live an independent life, rich in purpose, meaning and personal fulfilment.
- Be valued for your ethnic background, language, culture and faith.
- Be treated equally and be cared for in an environment which is free from bullying, harassment and discrimination.

- Be able to complain effectively without fear of victimisation.

Information for service users about this policy is contained in a separate leaflet.

Finally, we have developed this policy in sectional format to enable easy updating.

Note

This policy is concerned primarily with service matters, not employment services. Employment matters are dealt with by Human Resources and Performance.

This document does not deal with web accessibility which is a corporate matter for Orkney Islands Council.

This policy can be made available in appropriate languages on request and in different formats such as in large print, audio-format such as compact disc and Braille.

Section 2: Our "Accessibility Charter"

This "Accessibility Charter" outlines our commitments regarding service delivery. Information on legal and good practice standards is detailed in section 3 and Appendix 1.

2.1. We meet legal and good practice standards concerning the accessibility of our services. For example, we meet the requirements of the Equality Act 2010.

2.2. We monitor our services continuously to enable us to make reasonable adjustments to existing services, if required. This could include physical adaptations, as well as other methods of providing services, for example, carrying out home visits.

2.3. We publish information in plain language; if we need to use legal or technical terms, these are clearly explained.

2.4. We produce information in a range of formats, as needed by individual service users. This may include formats such as large print, audio format and Braille. This also complies with the legal duty to make reasonable adjustments to service provision to avoid unlawful discrimination.

2.5. We can provide information in different languages, as required. We do this through our approved list of interpreting and translation services. Service users receive these services free of charge.

2.6. We use qualified interpreters to provide signing services to hearing impaired people.

2.7. We use language that is appropriate and inoffensive to service users; this includes using imagery that encourages a positive view of other people.

2.8. We publicise information about our services widely, for example, we have developed a wide range of leaflets concerning housing services.

2.9. We provide staff training on our equality policy; this includes raising awareness of the nature of discrimination and its many forms.

2.10. We have established a performance management system to monitor if policy objectives are being met in practice.

2.11. We respond quickly to any complaints concerning the accessibility of service provision; we also publish information on complaints received and outcomes of complaints.

2.12. We review this policy formally on a regular basis. Amendments are made, as required, in consultation with service users.

Section 3: Law and Good Practice

This policy meets law and good practice requirements (see Appendix 1). This section of the policy outlines key principles that we meet to ensure that policy objectives are met in practice.

This section provides for a plain language summary of important law; it is not a precise statement of the law.

3.1. Legislation

The Equality Act 2010 defines disability. In line with the legislation, we must take steps to make services accessible to disabled people. If services are not accessible, we must make reasonable adjustments.

The duty to make reasonable adjustments covers issues such as:

- Changing policies and procedures.
- Providing auxiliary aids and services to make it easier for disabled people to access services.
- Addressing physical barriers to accessing services.

3.2. Reasonable Adjustments

3.2.1. Policies and Procedures

Policies may not be accessible to service users because of technical expressions or jargon. We assess our documentation, therefore, before it is published to ensure that it meets plain language standards. We use a standard checklist to evaluate documentation (Appendix 3: checklist of assessment).

3.2.2. Auxiliary Aids and Services

We can produce documents in a range of formats including in large print, Moon or Braille for visually impaired people. We also provide induction loop systems at the One Stop Shop.

Our website ensures that service users can access our information through Browse Aloud and facilitates oral translations of information published on the site.

3.2.3. Addressing Physical Barriers to Accessing Services

Physical barriers to accessing services take many forms such as inadequate lighting, office layout including its furniture and design of stairways.

We have carried out an access audit of our main housing office so that it is accessible to service users.

3.3. Good Practice

We have regard to good practice guidance when developing our services. For example, we consider the guidance contained in the disability rights Codes of Practice. And we take account of other guidance issued by agencies such as the Plain English Campaign and the Royal National Institute for the Blind. (See Appendix 5 for a list of contacts). We also ensure our housing services are closely linked to the Council's statement on disability equality.

Section 4: Service Standards

We have set standards to ensure that housing services are accessible to service users. These cover two main issues as follows:

- Information.
- Design.

The actual checklist that we use to meet the key standards outlined in this section is contained in Appendix 3.

4.1. Information

We apply the following standards when providing information to the public. Information covers written information and information provided in other formats, for example, audio-format such as compact disc.

4.1.1. Written Information

The key principles that we apply when producing written documentation are as follows:

- We use an appropriate type face (or font) in our written publications; this is Arial.
- We use a minimum type size of 12 point, although we provide information in larger print, as required.
- We keep sentences relatively short, between 15 to 20 words on average.
- We avoid jargon and use plain language; this principle applies also to documentation that is translated into other languages.
- We use stylistic techniques to produce more accessible text, for instance, we use bullet points to clarify key issues.

4.1.2. Information in Other Formats

When producing information in other formats or languages, we apply the following principles to ensure quality services:

- We produce audio-format that meet quality standards in terms of clarity of enunciation and pace of delivery.
- We use a recognised organisation when producing information in MOON or Braille to ensure that the format accurately reflects the text.
- We use a recognised organisation when translating documentation into written or audio-formats to ensure that the text is reproduced accurately, as well as in plain language.

4.2. Design

We apply the following principles when designing text:

- We do not split words between lines.
- We do not use words that contain all capitals; this is not accessible for visually impaired people.
- We avoid the use of italics; this is not accessible for visually impaired people.
- We avoid underlining of text that may hinder the recognition of individual letters.
- We align text to the left-hand margin as this enables the reader to identify the start and finish of each line more readily.
- We ensure our documents meet accessibility requirements to enable them to be read by Recite Me and similar programs.

When designing handbooks and the regular newsletter, we take account of the following matters:

- We ensure sufficient contrast between the text and the background; colour perception can be less accessible for visually impaired people. The key issue is that dark should be contrasted with light.
- We avoid using different colours, fonts and type size in the text.
- We use a contents page and sections to enhance the clarity of information.
- We include spacing between paragraphs to separate the text and aid clarity.
- We set text horizontally; vertical text is not accessible for visually impaired people.
- We do not use images, pictures and illustrations in the middle of text.
- We use graphs that are easy to follow and explain them also in plain language.
- We present illustrations, if used, in line drawing format with thick dark strokes or outlines.
- We use matt paper as glossy paper reflects light and thus causes glare; this should be uncoated and weighing over 90 grams.

Section 5: Training and Development

We evaluate the training needs of housing staff as part of our staff development and training policy.

We recognise that individual staff have different training needs that relate to:

- The duties of each job.
- The development needs of individual staff members.

As noted in section 1, this policy is part of our broader equality policy and its commitment to develop services that are accessible to the needs of individual service users.

Training issues that we promote in connection with this policy include:

- Legal training, for example, the requirements of the Equality Act 2010 to provide accessible services, including making reasonable adjustments.
- Policy training and training on good practice standards, for instance, the standards recommended by agencies such as the RNIB and the Plain English Campaign. The rationale for these recommendations is also an important part of such training.
- Practical training, for example, applying standards to producing documentation in plain language and the requirements of the Council's Equality Scheme.
- Awareness raising training to focus on views held consciously or sub-consciously such as Diversity Awareness Training and appropriate language use.

Section 6: Performance Management

We have established a number of methods for evaluating whether policy objectives are met in practice. These methods include:

- Accessibility surveys.
- Monitoring of complaints.
- Documentation checks.

In addition, we keep a log of translations etc carried out. This includes:

- Type of translation e.g., verbal or written.
- Relevant language.
- Document translated (if relevant).
- Type of other format used (document translated as above).
- Time taken.
- Cost.

6.1. Accessibility Surveys

We seek feedback from service users on a regular basis on the quality of our services concerning their accessibility. Methods that we use are:

- Tenant satisfaction surveys.
- Newsletters.
- Individual tenant satisfaction survey reports.

For instance, a newsletter article may ask reader views of how accessible it is; while a tenant satisfaction survey may be commissioned to identify the accessibility needs of individual service users. Information obtained from such exercises can then be used to populate our data base of accessibility requirements and then we could tailor our services accordingly.

6.2. Monitoring of Complaints

We monitor all complaints received; this includes complaints concerning the accessibility of services.

6.3. Documentation Checks

We assess all housing service publications using our standard checklist before their publication (Appendix 3).

This applies to all documentation that service users may access including:

- Housing plans and policies.
- Leaflets and booklets.
- Tenants' handbook.
- Newsletters.

In addition, we assess public documents that we hand out for other organisations, against our accessibility requirements.

These checks also apply when publications are updated in response to our monitoring procedures or legislative change etc.

Section 7: Consultation

We will review this policy regularly as part of our policy review procedure agreed through the Tenant Participation strategy.

Amendments will be made, as required, after full consultation with tenants, other service users and appropriate agencies.

An important part of this consultation in respect of this policy is to assess the views of tenants and service users of:

- Accessibility of information that we provide.
- Ways of improving this information, in particular how it is presented.

- Preferred methods of presentation, for example, textual as opposed to graphics, or whether a blend of information methods is preferred.

The process of consultation has involved:

- A small working group of officers and representatives from Orkney Islands Council have met to discuss equality and accessibility issues in relation to the delivery of housing services.
- Focus groups discussed accessibility issues and the involvement of tenants and other service users in service delivery.
- A review of best practice and accessibility of written information.
- Consultation with Staff.
- Consultation with relevant partner agencies including the RNIB.
- An article in the Housing News.

Appendix 1: Law and Good Practice Framework

This section provides a summary of key law and good practice guidance relevant to accessibility matters; it is updated as law and guidance evolves.

Law

The Equality Act 2010.

Housing (Scotland) Act 2010.

Good Practice

Code of Practice by the Disability Rights Commission: Rights of Access: Goods, Facilities, Services and Premises.

Other Standards

Royal National Institute for the Blind (2002): See it Right.

Scottish Accessible Information Forum (1999): Standards for Disability Information and Advice Provision in Scotland.

Appendix 2: Barriers to Quality Service Provision

Examples of barriers that can prevent people from gaining access to housing services are numerous.

Documentation may be inaccessible if it:

- Contains jargon or complex technical words.
- Omits important information, for instance, information about legal and other remedies.
- Is not available in other formats or different languages.
- Is not publicised sufficiently, for example, it is publicised in documents that people do not consult.
- Language is perceived as being negative, offensive or uninteresting by service users.
- Is presented through a website that does not accord with the principles contained in this policy (font, type size).

Other barriers derive from inadequate organisational practices such as inadequate monitoring and lack of training. These issues are addressed clearly in this policy.

Appendix 3: Documentation (checklist of assessment)

We implement the following procedures to meet our "Accessibility Charter" standards.

Each housing services document that is available to the public must be assessed before publication. This will be carried out by: Head of Community Learning, Leisure and Housing. The standard checklist overleaf should be used for this purpose.

Checklist

1. Does the document state that it can be made available, as required, in other formats and languages?

Yes.	
No.	

If no, insert the standard Housing Services statement to this effect.

This statement is: "This document can be produced in other languages and formats as required including large print, audio format and Braille."

2. Does the document state, in a prominent place, council commitments to promoting equal opportunities?

Yes.	
No.	

If no, list textual amendments required and where to be inserted.

3. Does the document promote negative images? (For example, does imagery indicate negative or discriminatory views on grounds of age, disability, race and sex or sexual orientation?).

Yes.	
No.	

If yes, list changes needed (That is, replace negative images with positive ones):

4. Is the language appropriate throughout the document? (For example, ensure that words do not conflict (a) with legal requirements and (b) with appropriate terminology).

Yes.	
No.	

If no, list words that need to be changed and insert amendments:

5. Is the text legally and factually accurate?

Yes.	
No.	

If no, list words that need to be changed and insert amendments:

6. Does the document meet plain English standards?

Yes.	
No.	

If no, list words/sentences/paragraphs that need to be changed and insert amendments (for example, sentences to be between 15 and 20 words in length).

7. Does the document comply with the accessibility standards agreed in the policy? (Font, type size).

Yes.	
No.	

If no, list amendments required and alter the text to the appropriate font and type size.

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8. Does the document provide information for service users how to seek advice? (Appeals and complaints).

Yes.	
No.	

If no, insert information on appeal rights and complaints.

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9. Does the document require to be translated into black and minority ethnic languages and/or other formats?

Yes.	
No.	

If yes, specify which languages and formats:

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10. General comments on the document concerning issues? (Overall standard;
possible training needs).

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Appendix 4: Census Categories

We use the census categories as follows:

Cultural Background

A: White.

Scottish.	
Other British.	
Irish.	
Any other White background.	

Please write in:

B: Mixed

Any mixed background.	

Please write in:

C: Asian, Asian Scottish or Asian British

Indian.	
Pakistani.	
Bangladeshi.	
Chinese.	
Any other Asian background.	

Please write in:

D: Black, Black Scottish or Black British

Caribbean.	
African.	
Any other Black background.	

Please write in:

E: Other Ethnic Background

Other ethnic background.	

Please write in:

Appendix 5: Useful Contacts

We offer a range of interpreting and translation services to promote our provision of accessible services. This section first explains these services and then provides a list of the agencies that we use.

These services include:

- Interpreting using the phone.
- Interpreting using interpreters.
- Translation of documentation.

Interpreting by Phone

We have a corporate contract with Language Line.

Their contact details are:

- Floor 25, 40 Bank Street, Canary Warf, London, E14 5NR.
- Telephone: 08001692879.
- Email: enquiries@languageline.co.uk.

Housing Services holds its own Customer Account Number and ID Code. These details are held by each Senior Housing Officer to ensure each section within Housing Services can readily access the service.

Interpreting using Interpreters

We provide personal interpreting services in respect of other language requirements and also signing services.

We use a small number of local linguistic interpreters and have local joint working arrangements with other organisations.

Interpreters who provide signing standards must satisfy strict standards, namely the British Sign Language Levels. Level 4 is the required level for fully qualified interpreters. A local interpreter can be arranged through Orkney College on 01856569000.

The Scottish Association of Sign Language Interpreters (SASLI) manages the list of registered sign language interpreters in Scotland.

They can be contacted at:

- Suite 196, Central Chambers, 93 Hope Street, Glasgow, G2 6LD.
- Telephone: 01412488159.
- Email: mail@sasli.org.uk.

Translation of Documentation

We translate written documentation, on request, into other formats such as Braille, MOON and audio tape.

We use a number of agencies to provide these services; details are given below on the contact list.

Large print can be provided in-house.

Braille, Moon and Dotted Moon are provided by Pia. Their contact details are:

- Gwasg Pia Cyf, Unit 42, John Baker Close, Llantarnam Industrial Estate, Cwmbran, NP44 3AW.
- Telephone: 01633488000
- Email: post@pia.co.uk.

Audio format is provided by:

- The Talking Newspaper, Orkney Library and Archive, 44 Junction Road, Kirkwall, KW15 1AG.
- Telephone: 01856873166.
- Email: orkneytalkingnewspaper@googlemail.com

Pia can also provide audio tape but The Talking Newspaper should be tried first.

Telephone contact with hearing impaired people

There is a service called Type-talk available. It is free of charge and involves dialling 18002 and then the client's number, when the call is answered by the hearing impaired person an operator will join the call. The office can then start the conversation the operator types what is said and then the deaf/hard of hearing client can either type a reply or speak a reply directly to the Officer. The only cost for the call is the usual cost for a BT call.

The induction loop system held by the One Stop Shop assists those with hearing aids. The loop systems are portable, easy to use and can be set up in any of the interview rooms. They are not used very often so don't need to be booked in advance.