



**Scottish Accessible
Information Forum**

Public Service Providers and Accessible Information

**An investigation into the challenges and needs of public
service providers by the Scottish Accessible Information
Forum, (SAiF), August 2009**

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Introduction

The Scottish Accessible Information Forum, (SAIF), aims to improve the standards and accessibility of information and advice services for disabled people and their carers so that disabled people can make informed choices and live independent lives as equal members of society.

Funded by the Scottish Government, the project employs two job-share project workers, (one full-time equivalent), and is managed by Consumer Focus Scotland, (formerly the Scottish Consumer Council). The SAIF advisory body, which acts as a steering group for the project, consists of 21 people representing providers of information and advice, as well as organisations of and for disabled people and their carers.

The aim of the research was to investigate the views of public service providers about the issues they face in relation to the provision of accessible information. This report summarises key findings.

Background

In 2004, the Disability Rights Commission estimated that there were around one million disabled adults in Scotland. This includes people with epilepsy, cancer, schizophrenia, Down's syndrome and many other types of impairment¹. Current Scottish Government figures state that one in five adults (19%) in Scotland are disabled². It is likely that the number of disabled people in Scotland will continue to rise due to the increasing ageing population and their likelihood to experience impairment.

The Disability Discrimination Act 1995 was introduced to end the discrimination that many disabled people face in their everyday lives. Part Three of this Act requires providers of goods, facilities and services to avoid less favourable treatment of disabled people and to make reasonable adjustments to any practices, policies or procedures which make it unreasonably difficult for disabled people to make use of their services. The 1995 Act was significantly extended by the Disability Discrimination Act 2005 which gives disabled people rights and access to all areas of life and

¹ Disability in Scotland 2004 (Disability Rights Commission)

² <http://www.scotland.gov.uk/topics/people/equality/disability>

places greater responsibilities on public bodies in respect of their policies towards disabled people. The inclusion of the Disability Equality Duty, (DED), which came into force in December 2006, signalled a more proactive approach requiring public bodies to look actively at ways of ensuring disabled people are treated equally. This means that they tackle disability discrimination in a practical way by introducing policies that actively promote opportunities and so prevent discrimination from taking place³.

As well as a legal responsibility, public bodies have a social responsibility to include disabled people and must ensure that the information and services they provide are accessible to all. Within this context providing accessible information has an important role to play, since information about goods and services which do not consider the impact on disabled people may result in them being excluded from those services.

SAIF was established in 1996 as a recommendation of the 1995 Scottish Office report 'Enabling Information'. This report highlighted the importance of accessible information to enable disabled people to participate in the democratic process, to claim their rights and entitlements as citizens and as consumers and to take responsibility for the quality of their lives⁴.

The report investigated improving access and raising standards in information services for disabled people and their carers and identified weaknesses in the existing pattern of information provision. An independent body, led by disabled people and information providers, SAIF was tasked with taking forward the report recommendations on behalf of government.

Working locally and nationally on a range of initiatives to promote accessible information, the project provides a wide variety of organisations with information, advice and training and has published a number of good practice guides and a set of standards.

SAIF aims to play a key national role encouraging organisations to recognise the importance of accessible information so that their services promote equality and eliminate discrimination.

³ <http://www.dotheduty.org/>

⁴ Enabling Information, Scottish Office, 1995

SAIF's overall remit is⁵:

- to develop and promote quality standards in information provision to disabled people and carers,
- to represent and promote the interests of disabled people in having access to accurate, relevant and timely information and advice about all goods and services,
- to promote communication between national and local information providers,
- to advise the Scottish Government on policy relating to accessible information,
- to improve disabled people's access to information.

⁵ <http://www.saifscotland.org.uk/aboutSF/backgr.htm>

Method and Sample

The aim of the research is to investigate the views of public service providers about the issues they face in relation to the provision of accessible information; to also obtain information about their awareness of SAIF and its services and the resources they use.

A sample of 24 public service providers, (10 local authorities, 8 health boards including special health boards and 6 other public sector organisations), was selected. From a time and resources perspective, it made sense to restrict interviews with organisations to the central belt, the Lothians and the Scottish Borders. However, since SAIF is a national organisation, public sector organisations in the north of Scotland were also contacted. A balance between those organisations which had previous contact with SAIF and those it had no record of was also aimed for.

Face-to-face interviews using a questionnaire facilitated answers to specific questions and allowed for further probing where necessary. In total, 19 interviews, (7 local authorities, 7 health boards and 5 other public sector organisations), were completed during February and March 2009.

The responsibility for ensuring accessible information within large public sector organisations rarely sits with one individual or department. Around a third of the interviews involved more than one member of staff from across different departments. These included public relations, corporate services, IT, communications, equality and diversity, marketing or design teams.

It is accepted by the interviewer that those participating in the interviews were not wholly representative of their organisation.

Interviews with five organisations were not possible either because no contact could be made with the correct person or although the correct person was identified, no contact was possible during the time when the research was carried out.

Main Findings

1. Awareness, policy and practice

Public service providers advised that awareness of the need to provide accessible information about services is higher at a corporate level or within specific departments such as social work, communications or equality and diversity teams. Recent changes in disability legislation such as the requirement to produce a Disability Equality Strategy (and impact assessment) and designated resources for equality and diversity have helped to increase awareness.

“In the centre it is higher; but at the coal face it will be low, there is less awareness of what the standard should be and what we should be doing. There is more awareness at the centre that we need to take account of people’s needs but whether or not that is being done is another issue.”

Awareness was felt to be lower at a service or operational level because of the size of the organisation and its wide-ranging functions and responsibilities. Some added that staff at this level do not have an understanding about what ‘accessible information’ actually means.

“If you press the button ‘accessible communication’ [staff] will think about alternative formats but they do not automatically think about accessibility. I think we have quite a way to go.”

A wide range of policy and practice examples were provided. Some good practice examples include:

“Although we are still in the early stages we are trying to build up a profile of those service-users who we know will want information in an alternative format, so that we can be more proactive about meeting their needs in relation to information about our services.”

“The Disability Action Group and the Partnership developed tip cards about information and communication support for our front line staff. Staff were able to add local information, for example signposting for braille transcripts or audio tapes on the back of the tip cards. It is more than just communication it is about good customer care.”

However, mentioned less were mechanisms to monitor and evaluate policy and practice effectiveness. The opportunity to build accessible information requirements into procurement and quality assurance processes was mentioned once.

2. Main challenges

When asked about the main challenges to producing information, those interviewed reiterated that the organisation's size and range of functions made it difficult to ensure a consistent approach to providing accessible information and quality control. In addition, collation and use of local needs information which would assist them to be more proactive in providing accessible information was said to be difficult to co-ordinate, (two organisations automatically provide council tax information in alternative formats).

A lack of confidence to turn around requests in some alternative formats quickly was expressed. This was due to a lack of knowledge and availability of alternative format and interpreting services. This also led to concerns about being able to demonstrate choice and value for money in the procurement of services. A lack of resources was mentioned by most organisations. Funding for interpreting services, some alternative formats (e.g. those which meet individual need) and plain language checking was identified as the most costly.

Evaluation and monitoring accessible information practice was also recognised as a challenge. A few organisations referred to the impact assessment process which would assist with this but were unable to provide examples, (other than existing complaints mechanisms), of how they monitor meeting accessible information needs.

3. Particular disability groups

A large majority of public sector organisations interviewed find providing information for people who have learning disabilities most challenging. As a result those with learning disabilities are most likely to be disadvantaged in accessing information about services.

There is confusion about whether a systematic approach to producing information is possible and about appropriate communication systems which should be used.

Consequently, although information has been produced in various easy-read formats most organisations are not confident that it meets need.

“The more it becomes an individualised need the harder it is for us. Someone who has a learning disability may have a lot of cognition and may be able to use easy-read with pictures to help them understand, whilst others might be able to use some symbols but not others – that’s difficult for us.”

There is a severe lack of British Sign Language, (BSL), interpreters across Scotland. Added financial pressure is experienced by public sector organisations responsible for large rural areas or out with the central belt.

4. Need to ensure accessible information

Since many organisations already stated they found it challenging to provide accessible information for people with learning disabilities, it is not surprising that this too was identified as a need. Definitions for plain language, plain English and easy-read were suggested and nationally agreed guidance about how to plan and deliver easy-read information was highlighted often.

Current easy-read guidance and information about the use and types of symbol systems was felt to be confusing. As a result, some organisations stated that they are doing the bare minimum. Agreed definitions and guidelines would clear up disagreement and confusion about what is an acceptable standard and provide organisations with a baseline so that they can go on to localise their own standards and meet individual need.

“There is a genuine need for some common language symbols for the more mainstream easy-read, (we know we need to take account of local or individual need at some point). An agreed Scotland-wide, free, widely publicised, definition and guidelines for plain language and symbols would go a long way to showing people the relevance of doing things.”

“There are lots of different organisations doing slightly different things which are confusing for someone who is trying to pick the one thing that they need in a timescale and within budget.”

“We would really appreciate a national steer on this, changing our templates and signage requires a big investment of money.”

A small amount of others did have positive experiences of producing easy-read documents and found that when produced correctly, these documents were in higher demand than their fuller versions.

A need for accessible information checklists for specific disability groups and for community engagement/consultation and plain language explanations for web accessibility standards was also expressed.

“Plain language descriptions of website accessibility guidelines would be helpful, you feel really disconnected and IT can over-rule you with the technical speak. So some plain language advice about what is needed would be really great.”

Targeted training to ensure that accessible information is provided more competently and comprehensively was seen as particularly important by five organisations. Training needs to go beyond raising awareness and should demonstrate to staff what it means for them and how it changes the job that they do.

A similar number of organisations stated that they would find a one-stop-shop which would keep them up-to-date with legislative requirements and provide solid information about good working practice very useful. Three of these organisations suggested that sharing of knowledge should be proactive and should be actively passed to them so that they knew what was expected of them.

“We need a forum to exchange information and good practice; this may also provide us with the potential to share costs and jointly provide information. There is a need for an on-line forum too, where we can discuss web accessibility guidelines.”

5. Sources of information, support and advice

In addition to SAIF, a wide range of national and local disability organisations that provide guidance, information and training which is impairment specific was highlighted as sources of information, support and advice. Internal sources such as patient information officers, dedicated speech or language therapists and social services departments and external partnerships, networks and multi-agency groups were also mentioned.

Almost all of the organisations interviewed advised that they worked with (and in some cases funded) local access panels and user groups.

6. Knowledge of SAIF and use of its services

Fourteen organisations had heard of SAIF and used one or more of its services. Five organisations had not heard of SAIF before or had heard the name but were not sure what the project did.

“[SAIF] was not the first organisation that came to mind. It’s important that you raise your profile a bit. It would give us the opportunity to get you involved in different projects, but if we don’t know about you...”

SAIF’s publications were mentioned most frequently. They have been used to develop policy or guidelines for staff and have been incorporated into some training programmes. Specific questions about SAIF’s publications were not asked, however the general feeling was that the publications provided a good starting point and were easy to use. Two organisations commented that the SAIF publication ‘Standards for Disability Information and Advice in Scotland’ were unwieldy.

Three of those interviewed had experience of SAIF training and commented positively. Around a third of the organisations had used the SAIF website or contacted SAIF as part of a consultation programme or to obtain information and advice. One organisation had benefited from a member of their staff on the SAIF Advisory Board.

7. Services providers would like to see

Organisations were asked if there were any services they would like to see SAIF provide which are currently not on offer.

1. The need to provide nationally agreed guidance for the production of easy-read formats was reiterated. The development of a standardised approach to symbols for signage in public buildings. Investigation into a national common symbol dictionary.
2. Production of a guide to producing accessible information policies which match up with their requirement to carry out impact assessments.
3. Provision of good practice examples.
4. A forum for exchange of information between organisations. A common point between organisations locally and nationally to exchange information.
5. Consultation on accessible information policies.
6. Consumer testing documents (e.g. Council Tax and Register to Vote).
7. Guidance about the process for continuing to make sure that your website is accessible.
8. National standards which mesh with legal responsibilities.
9. Raise issues about accessible information on our behalf at Scottish Government level.

8. Paying for training

SAIF's current charging policy ensures that the costs of training delivery are recovered and that no profit is made. The project wished to investigate how its costs for training were viewed and whether it is seen to be of less value than similar training which is charged at a higher rate.

Comments included:

- SAIF training costs are in-line with training provided by the voluntary sector.
- Best value, particularly in the current financial climate, and the credibility of an organisation comes before cost considerations.
- A preference for in-house training which would be cheaper and more accessible for organisations out with the central belt and could be procured by partnership organisations was expressed.

9. Providing staff with accessible information training

Three organisations stated that they do not provide training for staff in accessible information. Five said that it might be covered within equality and diversity training but that it was nothing specific.

Ten organisations indicated that training for staff in accessible information is included in disability awareness, equality and diversity training, induction or customer care training all of which is provided in-house. However most were unable to determine the extent to which accessible information was covered.

Training which has been delivered by other organisations included plain English, sensory disability awareness raising, producing easy-read information or accessible website training.

10. Ecommunication and use of the internet

Organisations that offer goods and services on the web have a legal duty to make their websites accessible to disabled people. In light of the massive contribution the web and other ecommunication methods can have in the participation of disabled people and delivery of an inclusive society, organisations were asked how they ensure that electronic formats are accessible and about plans for the increased use of the internet.

Not all of those interviewed felt confident in being able to answer this question as it was felt to be out with their remit. However most were able to provide some information.

For example:

- A small number view the internet as the main way of delivering accessible information.
- Most have been slow to act on accessibility.
- A need for clear information about organisations' responsibilities was expressed.
- Keeping information current and accessible is challenging; carrying out accessibility checks was felt to be particularly labour intensive and difficult to manage where resources are small.
- Information available in British Sign Language on the web is less likely because of the high costs associated with it.
- Nine organisations mentioned that they had achieved or were working towards the World Wide Consortium (W3C) Web Accessibility Initiative (WAI) web content accessibility guidelines. There was confusion about what this standard means and some felt that its use was arbitrary.
- Four organisations had carried out or plan to carry out user-testing; however two later advised that user-testing had not included accessibility. One other organisation stated that user-testing for accessibility had been built into procurement procedures for a new website.
- Five organisations have policy and or staff guidance which addresses accessible information on the web and/or accessible emails and documents.
- A small number of initiatives which were mentioned include screenreader software which provides assistance to sight impaired users, text-to-audio software which is used in recruitment website pages and website pages or micro sites specifically set up with accessibility in mind.

11. Embedding accessible information practice

Although organisations stated that corporate or senior management 'buy-in' and policy was important, it was felt that this in itself would not foster change in the way that staff produce information. Caution that staff did not view this as yet another initiative or 'add-on' to their work was expressed.

Most organisations recognised that embedding accessible information practice should be viewed as an on-going process where a range of mechanisms are used to ensure that they are successful.

Around half of those interviewed suggested that the impact assessment process could play a key role in embedding accessible information. The purpose of the impact assessment process is to ensure that organisations' activities do not disadvantage disabled people and identify where they can best promote equality of opportunity.

Should the assessment of activity or policy reveal an adverse impact or missed opportunity to achieve a more positive impact the organisation is required to look at how they can remedy this⁶.

Induction, customer care or targeted training which raised awareness and demonstrated the effect for disabled people and which also provided staff with the tools to provide accessible information was also recognised as key.

Two public sector organisations stated that they had a responsibility to raise awareness amongst service users that they had a right to ask for and receive information about services in a format which was accessible to them.

⁶ <http://www.dotheduty.org/>

Next Steps for SAIF

Thanks to everyone who contributed their considerable experience, thoughts and time to the research, ensuring that the results are of significant value to us.

This report will be sent to all those people who participated in the research and to other interested parties, including our funders at the Scottish Government. SAIF reports regularly to the Scottish Government and this report will be part of that process.

In relation to the key issues raised in this report:

- SAIF is already working towards good practice guidelines for producing easy-to-understand documents. We are looking at existing guidance and liaising with other organisations considering the same issues.
- Considerable progress has been made in recent years in raising the profile of SAIF. Since 2006, over 500 people from 135 different public and voluntary sector organisations have attended SAIF training. During the same period, SAIF has been involved in consultation work with over 50 key public sector bodies. Over the last 10 years, approximately 57,000 SAIF guidance publications have been distributed throughout Scotland. However, the issue of raising the SAIF profile remains an on-going objective and new initiatives are planned, including our new-look website.
- The next rewrite of the SAIF Standards for Disability Information and Advice Provision in Scotland will take on board all the feedback received since the last new edition in 2007, including feedback from this report. In particular, we will consider the relevance of impact assessments and disability equality schemes on SAIF Standards, other SAIF guidelines, advice and training.
- The Standards and other SAIF guidelines will also reinforce the importance of embedding accessible information issues throughout organisations, not just at policy level or within specialist services.
- SAIF has always been aware of the need for consumer testing, but has not been able to undertake this in any large scale way, due to resources. It is an issue which SAIF will continue to consider, in

terms of what we can do within existing resources, in partnership with others, or where additional resources can be accessed.

- A separate accreditation process for the SAIF Standards has not been pursued, as we believe the Standards should be incorporated into existing mainstream quality assurance systems, just as accessible information should be embedded throughout organisational policy. Recent, positive developments in this area have included discussions with the British Standards Institute.

We will continue to keep people up-to-date with our progress on these and other objectives through our website and our newsletters. If you would like to subscribe to our newsletter please email your contact details to sburn@saifscotland.org.uk

For further information on this report or the work of SAIF, please contact:

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