



RCSLT Response to the Regional Equality Plan 2017

Do you broadly agree with the regional Equality Action Plan?	Yes
Which part of the plan do you agree with?	See below
Section 1. Simplifying our Section 75 processes	
<ol style="list-style-type: none"> 1. We will review our staff training to ensure best practice in screening and EQIAs. 2. We will develop good practice guidance on effective engagement, consultation, co-design and co-production to include best use of a range of methods including social media 	<ul style="list-style-type: none"> • Guidance on effective engagement in place for health and social care staff that links with Personal and Public Involvement (PPI) best practice. • Citizens/people closer to decision making and offering innovative ways of engagement and involvement • Consistent approach used across health and social care. • More effective and timely engagement with stakeholders and more involvement in addressing key inequalities.

<p>and Citizen's Space. Page 6</p>	
<p>RCSLT Response</p>	<p><i>The Royal College of Speech and Language Therapists (RCSLT) support these actions and ask that the bespoke needs of individuals with communication difficulties are also considered as this group are most likely to experience inequalities. Often people with very significant communication difficulties are left out of the engagement process as it is assumed that their communication support needs are met by providing easy read documents. Many people with communication support needs require a more tailored approach. The challenge of meeting the needs of people with communication difficulties is more complex than just providing accessible information. The RCSLT strongly supports an inclusive communication approach which includes adjustments to the physical communication environment as well as reducing barriers relating to information dissemination.</i></p>
<p>3. We will set up a Regional Consultative Forum to work in partnership with the Equality Commission, Northern Ireland Human Rights Commission and the Community Relations Commission</p> <p>Page 7</p>	<ul style="list-style-type: none"> • Two meetings annually between health and social care sector and the respective Commissions. • Better communication and collaboration between Equality Commission, Northern Ireland Human Rights Commission and the Community Relations Commission • Better partnership working to optimise outcomes for S75 groups.

RCSLT response	<i>The Royal College of Speech and Language Therapists (RCSLT) support these actions and request that the RCSLT is included to ensure that the needs of people with complex communication difficulties are represented. RCSLT would also welcome the inclusion of people with communication difficulties on this forum.</i>
Are there any gaps, or do you have any other ideas for inclusion?	
<p>4. We will develop and implement a communication strategy to ensure that stakeholders are aware of Trust Equality Units, their functions and how they can be engaged on equality and human rights issues.</p> <p>Page 7</p>	<ul style="list-style-type: none"> • Strategy in place to improve communication. • Raised awareness among Section 75 groups of Trust Equality Units and how they can be involved in and influence Trust equality agenda.
RCSLT response	<i>The RCSLT ask that any communication strategy includes a section on 'inclusive communication' to ensure that people with communication support needs are not marginalised by this policy</i>

Section 2 – Promoting equality in our services

<p>5. We will review our equality training programme in collaboration with service users, carers and their advocates.</p> <p>Page 9</p>	<ul style="list-style-type: none">• Consistent staff training and awareness raising, co-produced and delivered, where appropriate, across health and social care.• Raised awareness among staff of the best way to promote equality of opportunity for service users.
<p>RCSLT Response</p>	<p><i>The RCSLT is pleased to see that the equality training will be reviewed and we would ask that people with communication support needs are included. We would also like to promote the My Journey My Voice programme to be part of the training provided. My Journey My Voice is a powerful photographs and stories exhibition designed to raise awareness of communication disability. It has been financially supported by the Northern Ireland Health and Social Care Board and Disability Action. More information can be found at http://www.myjourneymyvoice.org/</i></p>
<p>6. We will work with staff and service users to review how information is produced in alternative formats.</p> <p>Page 9</p>	<ul style="list-style-type: none">• Library of information in alternative formats available for health and social care staff and available on websites for service users and carers.• Staff have better access to alternative format resources.• Service users and carers have better access to accessible information.

<p>RCSLT Response</p>	<p><i>The RCSLT is concerned that Northern Ireland is falling behind the rest of the UK in disability legislation because unlike England we do not yet have an accessible communication standard. The aim of the accessible information standard is to make sure that people who have a disability, impairment or sensory loss get information that they can access and understand, and any communication support that they need.</i></p> <p><i>The RCSLT believe that this is an important step in ensuring that HSC information is standardised and that a legal obligation is placed upon statutory services to provide information in a manner which is accessible to people with communication difficulties.</i></p> <p><i>What does the accessible information standard tell organisations to do?</i></p> <p><i>As part of the accessible information standard, organisations that provide NHS or adult social care must do five things. They must:</i></p> <ol style="list-style-type: none"> <i>1. Ask people if they have any information or communication needs, and find out how to meet their needs.</i> <i>2. Record those needs clearly and in a set way.</i> <i>3. Highlight or flag the person’s file or notes so it is clear that they have information or communication needs and how to meet those needs.</i> <i>4. Share information about people’s information and communication needs with other providers of NHS and adult social care, when they have consent or permission to do so.</i> <i>5. Take steps to ensure that people receive information which they can access and understand, and receive communication support if they need it.</i>
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	<p><i>In England 'All organisations that provide NHS or adult social care must follow the accessible information standard by law.</i></p> <p>See https://www.gov.uk/government/publications/inclusive-communication/accessible-communication-formats</p>
<p>7. We will engage with the Regional HSC Interpreting Service to establish a process that ensures access to interpreting support when HSC practitioners refer into the voluntary sector for services.</p> <p>Page 10</p>	<ul style="list-style-type: none"> • Clear, consistent process established. • Improved access to interpreting support when referred to voluntary or community sector service.
<p>RCSLT Response</p>	<p><i>The RCSLT supports this action but feels that is not broad enough in scope. To encompass the ethos of the accessible communication standard referenced above this should be reworded as follows...</i></p> <p><i>To establish a process that ensures access to all forms of communication support for any person with communication support needs. This includes offering support for BSL users, Makaton users (see https://www.makaton.org/) and or visual strategies such as those used with people who have Autism Spectrum Disorder.</i></p>

<p>8. We will work in partnership with LGBT representative organisations to develop guidance for health and social care staff to ensure LGBT service users have access to services.</p> <p>Page 10</p>	<ul style="list-style-type: none"> • Consistent up to date staff guidance developed in partnership with LGBT organisations. • Enhanced awareness of access barriers for LGBT service users and carers. • Improved satisfaction with health and social care services for LGBT service users and carers.
<p>RCSLT Response</p>	<p><i>The RCSLT fully supports this action and supports greater awareness of the communication barriers facing trans individuals. Currently speech and language therapists provide voice and communication therapy to this population and as a profession we are acutely aware of the stigma and bias that many trans individuals face in society as a whole.</i></p>
<p>Section 3 –Supporting our staff</p>	
<p>9. We will simplify our Recruitment and Selection Process through development of an easy-to-follow information leaflet.</p> <p>Page 13</p>	<ul style="list-style-type: none"> • Easy to follow information leaflet available for people applying to work in health and social care to include overview of process, tips for successful application form, interview preparation and a section on frequently asked questions. • Raised awareness of process among applicants. • Improved access for hard to reach groups and those unfamiliar with the health and social care recruitment and selection process.

RCSLT response	<p><i>The RCSLT suggests that the recruitment and selection process itself is reviewed to ensure that people with communication support needs are not disadvantaged by the interview process.</i></p> <p><i>We have heard of many examples where people with stammers have been impacted negatively by the interview process and others have not been shortlisted when they have disclosed that they have a stammer on the application form.</i></p> <p><i>The RCSLT consider that shortlisting criteria such as 'good oral communication skills' may be discriminatory against people with communication disability.</i></p> <p><i>There needs to be a greater tolerance of the diversity in speaking voices in the same way as we now accept diversity in physical abilities.</i></p>
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RCSLT Response to the Disability Action Plan 2017

General Comments

People with communication support needs can face widespread exclusion and discrimination. In the Northern Ireland 2011 census 29,871 people identified communication difficulty as their main long term condition.

The RCSLT is concerned that despite the high numbers of residents in Northern Ireland who identify themselves as having a primary long term condition of communication difficulty there is no specific mention of communication disability in this plan. This is often a hidden disability. It would be useful to use this plan to highlight it. It may be useful to give a definition of disability at the outset so that people reading the plan see disability in a broad context which includes communication disability.

It is important to ensure that people with communication disability are represented on all groups and that they are appropriately supported to ensure their participation. Communication difficulties arise in many clinical conditions including motor neurone disease, multiple sclerosis, stroke and cancers of the head and neck. Sometimes they occur in isolation as in developmental language disorder or as in stammering.

	<p><i>We recognise that every community or group may include people with communication support needs but it would be useful to know if people contributing to this plan considered themselves as having a communication disability.</i></p> <p><i>Perhaps future events and consultations could ensure that people with a wide spectrum of communication support needs are included. People with communication difficulties often need extra support to join and contribute to events. It is often good practice to involve their carers also because they can understand the communication needs of the person they look after and can help.</i></p>
<p>Do you broadly agree with the regional Disability Action Plan?</p>	<p>yes</p>
<p>Which parts of the plan do you agree with?</p>	<p>See below</p>
<p>Section 1 – Promoting positive actions and increased participation through training, awareness and resources</p>	
<p>1. We will develop for staff a welcome pack with information about accessibility such as:</p> <ul style="list-style-type: none"> • arrangements for sign language interpreting • provision of auxiliary aids 	<ul style="list-style-type: none"> • Accessible welcome pack available for disabled service users to improve access to services • Improved service user and carer experience • Resource available for staff to support them to meet the needs of disabled service users and carers

<ul style="list-style-type: none"> • disability etiquette • alternative formats <p>Page 8</p>	
<p>RCSLT response</p>	<p><i>The RCSLT is encouraged by this objective and hopes that it will include training on communication disability and how to promote an inclusive communication environment.</i></p> <p><i>We recommend that our ‘five good communication standards’ are included in the welcome pack as they clearly set out the standards that should be applied in relation to an inclusive communication environment.</i></p> <p><i>They can be found here; https://www.rcslt.org/news/docs/good_comm_standards</i></p> <p><i>They are;</i></p> <p><i>Standard 1:</i> <i>There is a detailed description of how best to communicate with individuals</i></p> <p><i>Standard 2:</i> <i>Services demonstrate how they support individuals with communication needs to be involved with decisions about their care and their services</i></p> <p><i>Standard 3:</i> <i>Staff value and competently use the best approaches to communication with each individual they support</i></p> <p><i>Standard 4:</i> <i>Services create opportunities, relationships and environments that make individuals want to communicate</i></p> <p><i>Standard 5:</i> <i>Individuals are supported to understand and express their needs in relation to their health and wellbeing</i></p>

Difficulties with speech, language and communication can imprison the individual and severely limit their participation in family life, the community, education and the world of work. Everyone needs to understand information to access services effectively. Inclusive communication will enable people with communication support needs.

When talking about disability access and disability friendly it would be useful to broaden the context so people don't read it as purely physical access but consider communication access also. It is also important to ensure that a breadth of disability is understood as communication disability is not only concomitant with learning and sensory disability but is also as a stand alone disability.

Are there any gaps or do you have any other ideas for inclusion?

Section 1 – Promoting positive actions and increased participation through training, awareness and resources

The RCSLT suggests that one action that is missing in this section is a proactive action which supports developing positive attitudes to communication disability at a young age to promote inclusion, good mental health and reduce bullying.

The RCSLT is delighted to have received financial support to develop a communication disability project for school aged children which will address issues facing children with speech language and communication difficulties in a school context.

Working in partnership with education, Disability Action and speech and language therapists working in school settings, we are developing a classroom based resource to educate children about the diversity of communication styles. This will provide them with simple strategies to help them communicate with their peers who have communication support needs.

2. We will co-design and deliver bespoke disability equality training for frontline staff in partnership with disabled people.

- Disability equality training

- Consistent staff training and awareness raising, co-designed and delivered, where appropriate, across health and social care.
- Increased staff awareness on disability equality and how to promote positive attitudes and participation in public life.
- Disability equality training that will reflect all disabilities (including hidden,

<p>that will reflect all disabilities (including hidden, autism, sensory).</p> <p>Page 9</p>	<p>autism, sensory).</p> <p>Disability equality training that will challenge negative stereotypes / attitudes about disabled people</p>
<p>RCSLT response</p>	<p><i>The RCSLT would comment that communication disability could be highlighted here along with autism as a hidden disability. It may be useful to give a definition of disability so that people reading the plan see disability in a broad context which includes communication disability.</i></p> <p><i>Regarding empowering staff/training it would be important to ensure that disability awareness training includes communication disability awareness slides. In the spirit of co-production it would also be important to have someone with a communication disability to co-deliver this training.</i></p> <p><i>We believe that the plan could be further strengthened by developing core communication disability awareness training to promote more widespread understanding; this could be eLearning.</i></p> <p><i>In BHSCT an inclusive communication SLT working group are hoping to develop communication awareness induction training for all new staff working with children with disabilities and survey existing staff to identify their training needs.</i></p> <p><i>This work could be expanded across the region to ensure that all staff have access to communication awareness training. The RCSLT would also like to see the My</i></p>

	<p><i>Journey My Voice project used as a core element in any disability equality training. My Journey My Voice is a powerful photographs and stories exhibition designed to raise awareness about communication disability. It has been financially supported by the Northern Ireland Health and Social Care Board and also supported in its development by Disability Action. It can be found here; http://www.myjourneymyvoice.org/</i></p>
<p>3. We will support the regional initiative to promote awareness of Hospital Passports and undertake actions accordingly.</p> <p>Page 9</p>	<ul style="list-style-type: none"> • Promotion of initiative across all the health and social care organisations • Improved communication between staff and service users with a learning disability • Improved experience for people with a learning disability across health and social care when accessing hospital services • Enhanced support for staff to meet the needs of service users with a learning disability.
<p>RCSLT response</p>	<p><i>The RCSLT is encouraged by this objective, however we are concerned that no mention is made that this resource should be used to benefit all people with communication disability not just those with a learning disability.</i></p> <p><i>The RCSLT is concerned that Northern Ireland is falling behind the rest of the UK in disability legislation because unlike England we do not yet have an accessible communication standard. The aim of the accessible information standard is to make sure that people who have a disability, impairment or sensory loss get information that they can access and understand, and any communication support</i></p>

that they need.

The RCSLT believe that this is an important step in ensuring that HSC information is standardised and that a legal obligation is placed upon statutory services to provide information in a manner which is accessible to people with communication difficulties.

What does the accessible information standard tell organisations to do?

As part of the accessible information standard, organisations that provide NHS or adult social care must do five things. They must:

- 1. Ask people if they have any information or communication needs, and find out how to meet their needs.*
- 2. Record those needs clearly and in a set way.*
- 3. Highlight or flag the person's file or notes so it is clear that they have information or communication needs and how to meet those needs.*
- 4. Share information about people's information and communication needs with other providers of NHS and adult social care, when they have consent or permission to do so.*
- 5. Take steps to ensure that people receive information which they can access and understand, and receive communication support if they need it.*

In England 'All organisations that provide NHS or adult social care must follow the accessible information standard by law.

	<p>See https://www.gov.uk/government/publications/inclusive-communication/accessible-communication-formats</p> <p><i>The accessible communication standard in England is clearly inclusive of any group with communication support needs, not just those with learning disability and we strongly feel that any disability strategy should likewise be inclusive of all conditions that may result in a communication difficulty.</i></p>
<p>4. We will continue to support the implementation of the Regional Physical and Sensory Disability Strategy</p> <p>Page 10</p>	<ul style="list-style-type: none"> • Promotion of regional sensory awareness e-learning programme • Improve awareness among staff on how to ensure people with sensory impairment have access to information, services and supports.
<p>RCSLT response</p>	<p><i>The RCSLT suggests that the disability plan could be further enhanced by ensuring that there is a balance of actions for all groups of people with disabilities. As it stands the RCSLT is concerned that the strategy does not reflect sufficient actions relating specifically to addressing communication disability.</i></p> <p><i>We feel that the plan could be strengthened by inclusion of the following actions;</i></p> <ul style="list-style-type: none"> -Support for legislation for an accessible communication standard -The implementation of the review of the Alternative and Augmentative communication (AAC) care pathway and subsequent strategic redesign. -National statistics on AAC to be gathered by relevant

	<p><i>agencies to support future gathering of cost effectiveness data</i></p> <ul style="list-style-type: none"> <i>-The inclusion of communication disability training in core/mandatory disability training</i> <i>-The adoption of five good communication standards</i> <i>-The promotion and adoption of communication passports for all environments; (not just hospital passports) to mitigate against the vulnerability of people with communication difficulties</i> <i>-Specific questions included in the electronic care record to flag up communication support needs and to give individuals a choice in their preferred form of contact medium.</i>
<p>Section 2 – Supporting full participation of disabled people by improving accessibility</p>	
<p>5. We will join the Equality Commission ‘Every Customer Counts’ initiative to try and ensure that services and the physical environment is accessible.</p> <p>Page 11</p>	<ul style="list-style-type: none"> • Public commitment to ‘Every Customer Counts’ and formal sign up by being a campaign signatory. • Health and social care services accessible and open to all potential service users and carers. • Raised awareness of three good practice guides to illustrate reasonable adjustments which have been made by various service providers in a range of sectors. • Share practical examples of how to improve services for disabled service users and carers

<p>RCSLT response</p>	<p><i>The RCSLT is encouraged by the determination to ‘ensure that services and the physical environment is accessible’</i></p> <p><i>However we feel that this action needs to be strengthened by including communication in the statement so that it reads ‘ensure that services and the physical and communication environment is accessible’</i></p> <p><i>The RCSLT suggest that the current electronic care records could be reviewed to include a section/statement that describes whether an individual has a communication difficulty. This section should also include a record of a ‘preferred contact style’ so that individuals can express whether they would like to receive communications via texts or phone or through the written medium.</i></p> <p><i>Everyone needs to understand information to access services effectively. Inclusive communication will enable people with communication support needs;</i></p> <ul style="list-style-type: none"> <i>☒ to gain full access to services.</i> <i>☒ Understand what service providers are telling them.</i> <i>☒ Be understood.</i> <i>☒ Have a more positive experience of services.</i> <i>☒ Maintain the motivation to take up and stick to services that make positive change to their lives.</i>
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<p>6. We will work with representative groups to develop an accessibility checklist to ensure that health and social care facilities are considered accessible spaces for all.</p> <p>Page 11</p>	<ul style="list-style-type: none"> • Accessibility checklist for health and social care facilities developed in partnership with ECNI and voluntary and community sector. • Health and social care facilities accessible for service users and carers. • Information from checklist to support prioritisation of programme of accessibility works. • Resource developed to promote best practice in the built environment including autism friendly spaces. • Promotion of best practice when working with colleagues on modernisation projects or new builds • Guidance available on autism friendly spaces and Promote principles of autism friendly spaces and services
<p>RCSLT Response</p>	<p><i>Whilst much progress has been made towards inclusion and access for people with physical and sensory disabilities, and whilst we are encouraged to see mention of autism friendly spaces mentioned specifically here, there has been little focus upon improving the lives and participation in society for people with communication support needs.</i></p> <p><i>Unless communication disability is addressed as a discrete issue, the most vulnerable people in our society will continue to be excluded because they do not have a voice.</i></p> <p><i>We hope that the accessibility checklist will include statements which demonstrate an inclusive communication approach. For example ;</i></p>

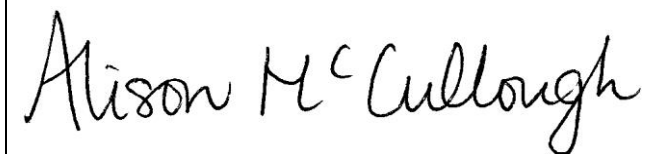
	<p>Environment.</p> <ul style="list-style-type: none"> • <i>People may require a specific contact method, a specific information format, a communication professional or communication support.</i> • <i>Adjust your communication style .It is easier for you to change your communication to make sure the person really understands. This might mean using easier words and shorter sentences.</i> • <i>reduce noise and improve lighting, use accessible signage,</i> • <i>remove physical barriers to communication,</i> • <i>Make it clear where people can go to get help and advice.</i> • <i>Use communication tools</i> <p><i>Be aware of the many communication tools that are available, e.g. Talking Mats, Hospital Passports, www.easyhealth.org.uk .</i></p>
<p>Section 3 – Supporting full participation of and positive attitudes towards disabled people in our workforce</p>	
<p>7. We will work in partnership with Recruitment Shared Services to promote a review of recruitment and selection processes to promote equality and ensure any barriers that may discourage a disabled person from applying</p>	<ul style="list-style-type: none"> • Barriers to recruitment and selection process removed/reduced • Best practice model developed in relation to online recruitment • Increased applications from people with a disability

<p>are identified and mitigated action as appropriate</p> <p>Page 13</p>	
<p>RCSLT response</p>	<p><i>The RCSLT is pleased to note that the recruitment and selection process itself is reviewed to ensure that there are reduced barriers for people with communication support needs and that they are not disadvantaged by the interview process.</i></p> <p><i>We have heard of many examples where people with stammers have been impacted negatively by the interview process and others have not been shortlisted when they have disclosed that they have a stammer on the application form.</i></p> <p><i>'In many workplaces there is little understanding or awareness of the issues that affect the 500,000 adults in the UK who stammer. People may not even realise that a colleague stammers, as s/he may go to great lengths to hide it.</i></p> <p><i>People who stammer often have qualities that employers rate highly, such as resilience, empathy, listening skills and creativity. Yet research says a huge stigma surrounds stammering and discrimination is commonplace.'</i></p> <p><i>See https://www.stammering.org/help-information/professionals-and-business/businesses/unlocking-talent-employers-stammering-network</i></p> <p><i>The RCSLT consider that shortlisting criteria such as 'good oral communication skills' may be discriminatory against people with communication disability.</i></p>

	<i>There needs to be a greater tolerance of the diversity in speaking voices in the same way as we now accept diversity in physical abilities.</i>
<p>8. We will review the Employment of Persons with a Disability Policy in partnership with disabled people and trade union representatives and extend the associated guidance.</p> <p>Page 15</p>	<ul style="list-style-type: none"> • Guidance updated to take account of any new research and to ensure issues relating to hidden disabilities / autism / mental health / negative attitudes and stereotypes is included. • Promotion of guidance across health and social care
<p>RSCLT response</p>	<p><i>The RCSLT consider that communication disability should be mentioned as an example of a hidden disability alongside Autism.</i></p> <p><i>The RCSLT would be happy to provide evidence for this review.</i></p> <p><i>In particular we have access to research which demonstrates the link between safeguarding and communication difficulties.</i></p>
<p>9. We will develop guidance on supporting people with autism in employment in partnership with representative organisations.</p> <p>Page 15</p>	<ul style="list-style-type: none"> • Co designed guidance produced which will raise awareness among staff of reasonable adjustments for people with autism • Promotion of guidance across health and social care

RSCLT response

The RCLT would also like to see this guidance broadened by also supporting people with communication difficulties into employment and we believe that this could be incorporated into such a document.

A handwritten signature in black ink that reads "Alison McCullough". The signature is written in a cursive style with a large initial 'A'.

Alison McCullough MBE

6 November 2017