



sustainable thriving achieving

**East Dunbartonshire Council**

[www.eastdunbarton.gov.uk](http://www.eastdunbarton.gov.uk)

# **Accessible Information Policy**

## **2016-19**

**Customer Services and Transformation Directorate**

# 1. Introduction

## 1.1 Policy Statement

This Policy provides details on the range of accessible information methods and formats that you can expect to receive from East Dunbartonshire Council (the Council). The Policy includes information that is provided by the Council to:

- The public
- Employees
- Elected Members
- Partner organisations

The policy has been written for use by members of the public and Council employees, but will also be of use to partner organisations.

The purpose of the Policy is to set out what members of the public, employees, elected members and partner organisations can expect from information being provided. In addition, the Policy provides an overall framework for anyone accessing information from the Council, whether that is through:

- Printed information
- Electronic information
- Face to face contact
- Telephone

The aims of this Policy are to reaffirm the commitment of the Council to provide information in an accessible manner, to set out the range of information provision methods and format that anyone can expect to receive from the Council and to provide clear information for anyone seeking to access information from the Council.

The intended outcome of this Policy is that all members of the public, Council employees, Elected Members and colleagues in partner organisations have more equality of opportunity when communicating with or being in receipt of communication from East Dunbartonshire Council.

It is also intended that this Policy makes the process of creating accessible services and information straightforward, and embedded further in Council business.

This policy provides an overall framework for accessible information however it also recognises that some Council Services will require a more robust approach. Where this is the case, the Service should contact the Communications Team.

## **1.2 Information is a Right**

The Council is obliged to make information accessible to everyone; not only to comply with legal duties but because it is essential to its vision to achieve the best with the people of East Dunbartonshire.

The Equality Act (2010) consolidates all previous forms of equality legislation and strengthens the requirement to eliminate direct and indirect discrimination, advance equality of opportunity and foster good relations. It replaces previous provisions in the Race Relations Act (2000) and the Disability Discriminations Act (2005). The Equality Act (2010) shifts the focus for listed public bodies from responding reactively to responding proactively to unequal experiences of public service. This includes accessing information in any form. Failure to provide to provide this in an appropriate format for an individual or a group of people is likely to lead to discrimination and would be unlawful under equality legislation.

The Human Rights Act (1998) brings most of the fundamental rights and freedoms contained in the European Convention on Human Rights directly into UK law. This includes, but is not exclusive to, the right to respect for private and family life, for home and correspondence and the right to education. Article 14 of the Human Rights Act (1998) prohibits discrimination in the enjoyment of all rights and freedoms set out in the Convention on any ground, such as language, disability or age.

## **1.3 How this Policy will make a difference to you**

The purpose of the Policy is to set out what all customers, including members of the public, employees, elected members and partner organisations, can expect from information provided by the Council and likewise what is expected of Council officers in their provision of information. This Policy provides an overall framework for recipients and providers of information. It ensures that printed, electronic, face-to-face and telephone information is available:

- To all customers in a manner that meets their needs
- On request
- Without delay
- Via translator or interpreter if required and
- In an alternative format if required

## 1.4 What this Policy links to

This Policy links to the suite of Communications and Customer Service strategies in the organisation including the Internal Communications Strategy, Social Media Strategy, Website Strategy and the organisation's range of communication plans.

It should also be considered alongside the Business Plans of all Service Areas especially those elements that involve communication and engagement with our employees and our customers.

## 1.5 Commitment Statement

Council publications which are available to the public must include the following statement:

This document can be provided in large print, Braille or on CD and can be translated into other community languages. Please contact the Council's Communications Team at:

East Dunbartonshire  
Council

12 Strathkelvin Place

Kirkintilloch

corpcommunicatons@eastdunbarton.gov.uk

G66 1TJ

0300 123 4510

本文件可按要求翻譯成中文，如有此需要，請電 **0300 123 4510**。

اس دستاویز کا درخواست کرنے پر (اردو) زبان میں ترجمہ کیا جاسکتا ہے۔ براہ مہربانی فون نمبر **0300 123 4510** پر رابطہ کریں۔

ਇਸ ਦਸਤਾਵੇਜ਼ ਦਾ ਮੰਗ ਕਰਨ ਤੇ ਪੰਜਾਬੀ ਵਿੱਚ ਮਨੁਵਾਦ ਕੀਤਾ ਜਾ ਸਕਦਾ ਹੈ। ਕਿਰਪਾ ਕਰਕੇ **0300 123 4510** ਫੋਨ ਕਰੋ।

Gabhaidh an sgrìobhainn seo cur gu Gàidhlig ma tha sin a dhìth oirbh. Cuiribh fòn gu **0300 123 4510**

अनुरोध करने पर यह दस्तावेज़ हिन्दी में भाषांतरित किया जा सकता है। कृपया **0300 123 4510** पर फ़ोन कीजिए।

The above statement is available as a PDF for Council Officers and Elected Members on the Hub or can be sourced by contacting the Communications Team.

Any printed publications should be produced through the Council's Communications Team, who will ensure that the appropriate wording is included.

## **2. Accessing interpreters, translators and alternative formats**

### **2.1 Interpreters**

This part of the policy focuses on making a meeting, an appointment or any other interpersonal aspect of a public service accessible to people who are limited in their communication. This may be due to a sensory impairment, a communication, cognitive or learning disability or no/limited proficiency in English.

#### **For Members of the Public:**

You can request an interpreter in a Council Office or Community Hub by pointing to the relevant language on the Language Line posters, which are displayed in reception areas. A telephone interpreter can be provided immediately via this service (see section 2.2).

For scheduled meetings or appointments an interpreter may be arranged by the Council. This will be arranged for a date that suits you and that an interpreter is available. British Sign Language (BSL) is recognised as a language and BSL interpreters amongst other methods of Deafblind interpretation can also be arranged for scheduled meetings or appointments.

If an interpreter is unavailable, the Language Line service may be used (see section 2.2) however all decisions to use this service will be sensitive to the needs of the service user and purpose of the meeting or appointment or other.

The Council will never ask for any costs associated with procuring an interpreter to be met by the service user.

#### **For Council Officers and Elected Members:**

You can request an interpreter by contacting the Communications Team. A Communications Advisor will work with you to source the most appropriate interpreter for yours and the service user's needs.

Where an interpreter is found, it is up to you to contact them and for your Service to pay any associated costs. Where you have a contract with an interpreter, there is no need to route every request through Communications. However all requests must be copied to the Communications Team for monitoring purposes.

Relatives and carers may wish to act as interpreters however extreme caution needs to be exercised and it is advisable not to use informal interpretation methods like this. There are risks of information being filtered or misinterpreted both unintentionally and intentionally. Officers should be aware that there are some situations, such as domestic abuse and child abuse, where informal methods of interpretation could present an increased risk.

**Using Approved Interpreters:** It is essential that interpreters are qualified, independent and live a reasonable distance away from the service user in order to minimise any conflict of interest. Interpreters should be the same gender as the service user where possible, unless otherwise requested by the service user.

**Confidentiality:** Council Officers and Elected Members should ensure that interpreters sign a written undertaking that they will keep all information being interpreted strictly confidential.

**In the Meeting or Appointment:** At the beginning, all parties must be clear about:

- The identity of the people involved
- The purpose of the meeting
- How long the meeting is likely to last
- Any difficult language or concepts
- How the initial introductions will be carried out

## **2.2 Language Line**

The Council subscribes to Language Line which is a service that provides immediate telephone based interpretation where a conversation is relayed by an interpreter through the telephone. This service has been made available in all Council Office reception areas and Community Hubs where members of the public will interact face-to-face with the Council. It can also be used by the Customer Contact Centre and relevant Council Officers who need to phone a service user whose first language is not English, as long as the required language is known.

### **For Members of the Public:**

On entering a Council Office or Community Hub you can request interpretation by pointing to the relevant language on the Language Line posters, which are displayed in reception areas. Council officers will be able to telephone Language Line and hold a conversation relayed through the interpreter immediately.

### **For Council Officers and Elected Members:**

A poster with a telephone number next to each of the most requested community languages is displayed in all Council Office and Community Hub reception areas. Officers should ensure they are familiar with this.

To use Language Line ring 0845 310 9900, then quote the Council's ID code (if you do not know please contact the Communications Team). You will be put through to a telephone interpreter. Users can select the 'loud speaker' function of their telephone if available.

Language Line (0800 169 2879) produce training CD's and will provide face to face training for groups on request. Any training request should go through the People Development Team for monitoring purposes. Language Line can also provide dual handset telephones, which allow two people to speak to a third person over the phone without going onto loud speaker.

In choosing to use Language Line for scheduled meetings or appointments a number of factors must be considered:

- Length of time interpretation is required. It is advised that telephone interpretation through Language Line is not used for longer than 30 minutes.
- Whether a service user requires non-verbal communication such as British Sign Language or Deafblind Manual.
- Whether a service user has a disability which would make telephone interpreting difficult
- Whether conversation needs to be recorded for legal reasons
- Child or Adult Protection infringements

Directorates pay for use of the service through charges for the telephone calls. Language Line produces statistical information on service use that can be broken down to Directorates.

### **2.3 Next Generation Text (replaced TypeTalk)**

The Next Generation Text (NGT) service replaces the previous TypeTalk system the Council used and works in a similar way. You can make calls in the same way as before using the same textphone or telephone.

The service enables people with hearing and speech difficulties to communicate with hearing people anywhere in the world using a text phone. Users with a textphone dial direct, prefixing any telephone number with a 5 digit code '18001'. A text relay assistant then links the telephone user and the hearing person and relays the conversation. The service can also be used in reverse thereby allowing a hearing person to return the call.

The NGT service is available on home, office, and mobile phone lines from BT and other UK fixed and mobile phone service providers.

There is also a free **NGT Lite app** for computers, smartphones, and tablets which can replace txt phones. Details on the service can be found on the NGT website [ngts.org.uk](http://ngts.org.uk)

## 2.4 Hearing Loops

There are Hearing Loops installed (or planned to be installed) in the following Council buildings:

- Bishopbriggs War Memorial Hall (installed in 2012)
- Craighead Community Education Centre
- Auchinairn Community Education Centre (installed in 2012)
- Kilmardinny House (installed in 2012 - new extension will also include loop when build in 2016)
- Westerton Hall (installed in 2012)
- Bearsden Burgh Hall (to be installed 2016)

Hillhead Community Centre (installed in the main hall in new build completed 2014). There are also Hearing Loops in the three leisure centres operated by EDLC Trust.

If any member of the public is planning to attend a public meeting organised by the Council and has hearing difficulties, they should contact the Council's Customer Services and we will investigate if it is possible to provide a portable hearing loop to the venue of the meeting.

## 2.6 Translations

### **For Members of the Public:**

At any point in time someone can request that a document is translated into a language other than English or transcribed to another format. The Council will then review the request, confirm if it believes that the translation is a requirement and if so progress the request. The information on how to request this is included in section 1.5 of this Policy document and should be printed on the back of all published documents for the public. The information can be provided in a fact sheet to support all other communications such as letters.

### **For Council Officers and Elected Members:**

Council publications that are available to the public must include the statement included in section 1.5 of this Policy document. Any printed publications should be produced through the Communications Team, who will ensure that the appropriate statement is included.

Translations are currently coordinated through the Communications Team. Costs for the Customer Services & Transformation Directorate are met by Communications, however costs for providing translations from other service areas should be met by the Service that produced the document being translated. Services that receive a request for a document to be translated



should contact the Communications Team with the request and the following information:

- What language (or format) is required
- What the timescale is
- An electronic copy of the document
- A cost code for the work

Our policy for arranging translations is to get three quotes for each job. The quote must include a cost for the job and a timescale the company can complete the work in.

It is important that we know how often we get requests for translations and we keep a record of all the requests that are made. This way we can:

- Check for key languages, issues, localities and services
- Use data to inform policy and partnership working
- Keep track of the changing patterns of languages spoken in East Dunbartonshire
- Report on the levels of requests in our area

## **2.5 Braille & Audio**

At any point in time someone can request that a document is provided in Braille or in audio format. As with all translations, requests should be made by contacting Customer Services on 0300 123 4510 and asking for the Communications Team who will co-ordinate the translation or transcription with an approved provider.

## **3. Language and Presentation**

### **3.1 Plain Language**

Plain language is about making sure that everything we write is clear to read. In order to make our documents clear we apply the principles of the Plain English Campaign. The Communications Team can advise all Council Services on the use of Plain English in their documents and written communications. The Plain English Campaign define Plain English as: 'something that the intended audience can read, understand and act upon the first time they read it'. The Plain English Campaign list what they consider plain language to be, including:

- Using short words that are commonly used
- Using 'you' and 'we'

- Not being afraid to give instructions
- Using positive language
- Avoiding jargon
- Explaining what acronyms stand for, such as Citizen's Advice Bureau instead of CAB
- Using words rather than abbreviations or symbols, for example care of, not c/o
- Keeping sentences and paragraphs short (a maximum of 15-20 word sentences)
- Using headings to break up writing
- Explaining any technical terms you have to use
- Avoiding long-winded sentences
- Using the active voice, 'I will eat cakes', rather than the passive voice, 'cakes will be eaten by me'
- Choosing a photograph, diagram or illustration to replace long written descriptions
- Only using basic punctuation. , ; : / ( )
- Avoiding phrases such as inter alia and raison d'être, where an English equivalent can be used.

You can find all this at: <http://www.plainenglish.co.uk/free-guides.html>

### 3.2 Type Size, Weight, Face and Style

The Scottish Accessible Information Forum advises that information should be provided in a minimum type size of point 12. The Council's standard is to use 12 point text in letters and word documents. Our designers ensure that our printed publications are accessible and include information on how they can be requested in alternative formats.

Large text versions of all our documents can be made available on request. The RNIB recommends that large text is 16 to 22 point font size and the Council typically uses 20 point if no size is specified by the customer. Medium or **bold weight fonts** are more accessible than light ones.

Our Corporate Identity guidance states that we should use the following typefaces:

- Times New Roman for day to day use.
- Arial or Gill Sans for printed publications
- Verdana on web pages.

Simulated handwriting and elaborate typefaces are difficult to read and should not be used. Aim for a clear colour contrast. Black text on a white background and **strong blue text on a yellow background** provides the best contrast. Avoid using ink which is a darker tone of the same colour as the paper. People with colour blindness may have problems distinguishing **reds** or **greens**.

Avoid using glossy paper because the glare makes it difficult to read. Choose uncoated paper or matt. Thin paper should not be used when printing your document on both sides. If the text is showing through from the reverse side, then the paper is too thin.

Remember that bold and large text is more like to show through. Choose paper with a minimum density of 90 GSM.

### **3.3 Page Layout and Navigational Aids**

To make a document accessible:

- Keep the same space between each word.
- Do not condense or s t r e t c h words
- Try not to write more than 60-70 letters per line
- Do not split words at the end of lines
- Align text to the left margin so it is easy to find the start and finish of each line
- Avoid justified text as it creates uneven spacing between words
- Break information down into sections with titles and sub titles

It is good practice to use number headings and paragraphs in long documents and use a contents list to guide readers to sections and pages. It is also helpful to place clear page numbers in the same position on each page. Leaving a space between paragraphs makes reading easier.

Do not write letters over pictures.

## **4. The Council Website**

The Council is committed to making its website accessible to everybody. A new design of website was launched in October 2015, designed to ensure that the website displays and operates effectively on mobile devices (such as tablets and smart phones) as over 50% of visitors to the site use these.

A large clear font and text size were key elements of the new design and as the site is mobile-device compatible, users can increase the content size through their mobile screen. Feedback and current practice indicates that visitors use the software

that comes with their devices to read the content, rather than providing software from within the website.

We aim to continue to improve the level of accessibility by following WCAG 2.0 guidelines and continue to review the site to ensure we are achieving Accessibility standards (A, AA, AAA).

# Appendix 1 Communication Support Principles

In order to engage effectively with people who have communication support needs, Communication Forum Scotland has identified 6 Communication Support Principles.

The principles have been developed through consultation with:

- Individuals with a range of communication support needs
- The Inclusive Communication Network (a group of speech and language therapists in Scotland)
- Other specialists in communication access.

You can access more detailed practical advice in relation to each principle by visiting [http://www.communicationforumscotland.org.uk/2010/TK\\_Principles\\_Home.php](http://www.communicationforumscotland.org.uk/2010/TK_Principles_Home.php)

**Principle 1: Recognise that every community or group may include people with communication support needs.**

**Principle 2: Find out what support is required.**

**Principle 3: Match the way you communicate to the ways people understand.**

**Principle 4: Respond sensitively to all the ways an individual uses to express themselves.**

**Principle 5: Give people the opportunity to communicate to the best of their abilities.**

**Principle 6: Keep trying.**

## Appendix 2 Current Providers

### Translation and Interpretation Services

Company	Address	Tel/Fax	Email/Website
<b>Global Connections (Scotland) Ltd</b>	2 <sup>nd</sup> Floor 180 Hope Street Glasgow G2 2UE	T: 0141 332 8889 F: 0141 332 8881	info@globalconnects.com www.globalconnects.com
<b>Language Line</b>	25 <sup>th</sup> Floor 40 Bank Street Canary Wharf London E14 5NR	Enquiries T: 0800 169 2879 Interpreters T: 0845 310 9900	sales@languageline.co.uk www.languageline.co.uk
<b>Global Voices</b>	Global Voices Scion House Innovation Park Stirling FK9 4NF	T: 0845 130 1170 F: 0845 130 1171	project@globalvoices.co.uk sales@globalvoices.co.uk www.globalvoices.co.uk
<b>Capita</b>	Riverside Court Huddersfield Road Delph Oldham OL3 5FZ	T: 0845 367 7000 F: 0845 367 7007	www.capitatranslationinterpreting.com

### British Sign Language Interpreters

Company	Address	Tel/Fax	Email/Website
Deaf Connections	100 Norfolk Street Glasgow G5 9EJ	T: 0141 420 2820 F: 0141 429 6860	enquiries@deafconnections.co.uk.
Bslis	Abercromby Street Glasgow Lanarkshire G40 2DD	T: 0141 554 6644	
Scottish Association of Sign Language Interpreters	50 Wellington Street Glasgow G2 6HJ	T: 0141 202 0791 F: 0141 2020792	mail@sasli.org.uk

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### Audio Transcription

<b>Company</b>	<b>Address</b>	<b>Tel/Fax</b>	<b>Email/Website</b>
<b>RNIB</b> Royal National Institute of the Blind	105 Judd Street London WC1H 9NE	T: 020 7391 2341 or T: 020 7391 2030. F: 020 7388 2034	tcjuddst@rnib.org.uk www.rnib.org.uk
<b>Cue and Review</b>	18 Crowhill Road Bishopbriggs Glasgow G64 1QY	T: 0141 772 3976	www.cueandreview.co.uk

## Appendix 3 Accessibility Organisations

Communication support: Communication Forum Scotland

<http://www.communicationforumscotland.org.uk>

Learning disabilities: Mencap

<http://www.mencap.org.uk/node/5905>

Visual impairments: RNIB

<http://www.rnib.org.uk/>

Hearing impairments: Action on Hearing Loss

<http://www.actiononhearingloss.org.uk/>

Plain English Campaign

<http://www.plainenglish.co.uk/>

### Local Sensory Impairment Organisations

DeafBlind Scotland  
21 Alexandra Avenue  
Lenzie  
Glasgow  
G66 5BG  
[info@deafblindscotland.org.uk](mailto:info@deafblindscotland.org.uk)  
Tel: 0141 777 6111  
Fax: 0141 775 3311

Visibility  
2 Queens Crescent  
St. George's Cross  
Glasgow  
G4 9BW  
[info@visibility.org.uk](mailto:info@visibility.org.uk)  
Tel: 0141 332 4632

### Local Accessibility Organisations

East Dunbartonshire Access Panel  
c/o East Dunbartonshire Voluntary Action  
Unit 4 & 5, 18 Townhead  
Kirkintilloch  
Glasgow



G66 1NL  
[info@edva.org](mailto:info@edva.org)  
Tel: 0141 578 6680