

Response to recommendations of the Healthwatch Hampshire ‘Our Hands Tied’ Report

NHS West Hampshire Clinical Commissioning Group (CCG) recognises the ‘Our hands tied’ report as an important piece of work, and the principles are those which the CCG would expect all providers to aspire to as a core requirement of new specifications. The questions and assurance for the CCG can only be answered by providers. Although we already monitor how well providers meet the needs of patients and carers with accessible information and communication support needs, it would help us if Healthwatch Hampshire could share with the CCG any benchmark information gathered as part of the responses to the report from NHS Trusts. This will strengthen our ability to work with providers on delivering the recommendations going forward.

Recommendation	West Hampshire CCG response
Complaints	<p>Given the recommendations set out in the ‘Our hands tied’ report, as our relevant policies come up for review, we will ensure that the requirements of patients with accessible information and communication support needs are considered. Where necessary, we will amend policies so that these needs can be met and the AIS complied with.</p>
<ol style="list-style-type: none"> 1. Health and care settings should review all internal policies to ensure the Accessible Information Standard (AIS) is complied with. <ol style="list-style-type: none"> 2. Hospitals should review their PALS complaints procedures: <ul style="list-style-type: none"> • Information and process must be available in a format that is accessible to all • Complaints procedures must be carried out with appropriate provision to meet patient’s accessibility requests in a timely manner • Responses to complaints must be in the format requested by patients • Allow complaints to be given in formats 	<p>The CCG has a Complaints Policy which has been adjusted to better meet the needs of complainants with communication support or accessible information needs. During 2018 the CCG Complaints Team has developed an easy read complaints leaflet. We also seek feedback (including on the accessibility of the complaints process) from everyone that has used the service.</p> <p>When the Complaints Policy is next reviewed, we will take the recommendations in the ‘Our hands tied’ report into</p>

	other than written (e.g. BSL).	account and adjust the policy further.
Choice	3. Allow patients and carers flexibility when selecting registered interpreters to meet the patient's needs. This may include preference over female/male interpreters or switching interpreters due to conflict of interest.	The CCG will monitor whether commissioned providers are offering choice of interpreter via the Quality Schedule (see also response to recommendation 5 below)
Training and accountability	4. Ensure all frontline staff have access to training on the following: <ul style="list-style-type: none"> • Deaf awareness • The use of text relay systems and how to use them • Safeguarding and understanding accountability (Duty of care) • Understanding the use of interpreters • Signposting to accessible formats to meet the needs of the patient. 	During 2017 the CCG worked in partnership with Healthwatch Hampshire to devise and deliver deaf awareness training to GP practice staff in our area. The package includes impact of deafness when using health services, how to book a BSL interpreter, reasonable adjustments and the Equality Act 2010, and the accessible Information Standard. This training will continue to be available to practices.
Access and information	5. Provide NHS frontline staff with information and access to the appropriate resources to comply with the AIS.	In 2016 the CCG worked in partnership with the Wessex Local Medical Committees (LMC) to develop a 'Lunch and Learn' training package on how to prepare for the Accessible Information Standard. This is accessible via the LMC website to GP practices that are members. The CCG also created a page on our website dedicated to the Accessible Information Standard. This explains the purpose of the AIS and provides links to useful resources. We promoted this page to GP practices across West Hampshire using our dedicated newsletter.

		<p>https://www.england.nhs.uk/nhs-standard-contract/2017-19-update-may/</p> <p>To comply with Service Condition 13.2 in the standard NHS contract, providers must give appropriate assistance and make reasonable adjustments for service users and carers who do not speak, read or write English or who have communication difficulties (including hearing, oral or learning impairments). The CCG has been monitoring how well the services we commission achieve this for the last few years. This includes requesting an audit report from providers each year</p>
	<p>6. Signpost appropriately to other sources of information in appropriate formats (if services cannot provide this directly) such as Macmillan's BSL information about cancer or Diabetes UK BSL information.</p>	<p>The CCG will promote sources of information in appropriate formats to GP practices across West Hampshire. We will also encourage commissioned providers to make staff aware of this information.</p>

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