

## The Accessible Information Standard: Update on implementation in community pharmacy

### Issue

Last summer, pharmacy bodies informed contractors that NHS England were introducing a new Accessible Information Standard (the Standard), which would be a legal requirement for all providers of NHS and adult social care services in England, including community pharmacies.

The purpose of the Standard is to ensure that people who have accessible information and / or communication support needs because of a disability, impairment or sensory loss receive information in a suitable format, ideally of their choice.

Pharmacy contractors have an important role to play in ensuring NHS funded services are accessible to all, and pharmacy teams already make efforts to provide information to people in formats that they can understand and appropriate support to help them to communicate. While Pharmacy Voice and PSNC support the principles of the Standard, we had a number of concerns about the proportionality and feasibility of implementing it in primary care and called on NHS England to consider how its principles could be met in a flexible and pragmatic way that minimises undue costs to businesses and maximises the likelihood that people will receive the standards of support they should expect.

In February 2016, Pharmacy Voice, along with colleagues representing the other primary care professions, met with NHS England to discuss these concerns. We were reassured to hear that the Standard was not intended to create additional bureaucracy and should be implemented flexibly rather than as a tick-box exercise. NHS England responded to all of the concerns we raised and agreed to work with us to produce specific guidance for providers working in primary care settings.

The purpose of this briefing is to update community pharmacy contractors on the requirements of this Standard, to explain what steps you need to take next, what we are doing and to let you know what support we aim to provide you with.

### Immediate action

As the [PSNC Briefing 039/15](#) outlined, contractors should by now have started preparing for implementation of the Standard. Reading our briefing and considering how you will implement it in your community pharmacy meets that initial requirement.

From 1 April 2016, pharmacy teams should, as a matter of normal routine practice, ask patients about any accessible information and / or communication needs they may have and ensure that information is recorded on their notes. Where you can act on this information right away by making simple adjustments you should do so, but you are not legally required to take any action under the Standard until 31 July 2016. However, you must continue to meet the existing requirements of the Equality Act 2010 – a separate legal obligation - by making reasonable adjustments to support persons with a disability to access your services.

### Clarification on the Requirements of the Standard

Over the next few months we, alongside the other primary care professions, will be working with NHS England to produce more detailed guidance to help you meet your responsibilities to patients with accessible information and / or communication needs. In the meantime, you may find the following points of clarification from NHS England helpful:

1. **Ask:** as a matter of routine you must find out if a new or returning patient has any information or communication support needs *relating to a disability, sensory loss or other impairment (e.g. stroke)*.

For example, ask patients if they require any reasonable adjustments to be made when conducting a New Medicine Service. You may also wish to update your consultation room information signs and patient information forms. See Appendix 1 for example forms of words to use in your pharmacy and on your website.

- 2. Record:** clearly and consistently record those needs in the patient's records (paper or electronic).

You can record these needs in any way that is clear, consistent and practical, for example, on your PMR system. The key point is that the information is meaningful and can be acted on. You are not required to use any specific language or terminology, but you must ensure that you record the person's actual accessible information and / or communication needs and not simply their diagnosis (e.g. "deaf - can lip read", not just that the person is deaf; or "severely sight impaired - send information by email", not just that they are blind).

- 3. Alert/Flag:** the recorded needs must be 'highly visible' - so that it can be seen and acted upon whenever the individual patient's record is accessed.

This should be done in the same way as for any other risk information (e.g. known allergies). NHS England has confirmed that it is sufficient to highlight this information on the notes field of electronic records or front sheet of paper records in key information. It is NOT necessary to display this information as a flag/banner on each page of an electronic record if your patient record system does not have this functionality.

- 4. Share:** you should include information about a patient's accessible information and / or communication needs at referral and handover, following your existing data sharing processes.

NHS England has clarified that the Standard should not create additional layers of bureaucracy. You should follow your existing procedures for gaining the consent of a patient to treatment and to sharing information about them with other professionals, which may normally be implicit, for example in making a referral to a GP. This means that you will not need to obtain consent specifically for sharing people's information and communication needs or renew consent at each stage unless this is your normal practice.

- 5. Act:** make reasonable adjustments to ensure that people receive information in a format they can understand.

The adjustments you make should be reasonable – but this does not mean that the patient must always receive information in their preferred format. What is important is that they can access and understand the information. The Standard is intended to promote flexible and practical adjustments that enable people with information and communication support needs to participate fully in their care, not to impose undue burdens on community pharmacy that do little to benefit patients. For example, you are not expected to hold stocks of patient materials available in alternative formats or to invest in adaptive technologies or brailers. Instead, be prepared to find an alternative solution, such as voice recording a patient's medication instructions into their phone or emailing them a copy of their referral letter or Patient Information Leaflet (PILs).

You will, however, be expected to provide materials in alternative formats upon reasonable request. NHS England has advised:

- An up to date database of PILs, viewable in different formats, is available on the website X-PIL online (<http://xpil.medicines.org.uk/WhatsNew.aspx>).
- Patients can also listen to or request PILs in different formats such as large/clear print, braille or audio CD by contacting the Royal National Institute for the Blind (RNIB). You can refer your patients to the RNIB Medicine Leaflet line or request PILs in different formats on your patient's behalf, free of charge by phoning **0800 198 5000** 24 hours a day, 7 days a week. Further details can be found at <http://xpil.medicines.org.uk/RNIBInfo.aspx>

**It has not yet been clarified how more costly adjustments (e.g. BSL interpreters) are to be funded. Pharmacy Voice, PSNC and our primary and community care partners will continue discussions on this point with NHS England. Until then there is no change to the status quo.**

## Further Information

Information on the Accessible Information Standard is available on the NHS England website. Go to <https://www.england.nhs.uk/ourwork/patients/accessibleinfo-2/>

We are now working with NHS England to produce material to support contractors in comply fully with the requirements of the Standard according to the timescales set out by NHS England.

In the meantime for further information, please consider the following:

- The PSNC website <http://psnc.org.uk/contract-it/pharmacy-regulation/dda/information-standard/>;
- Your company head office;
- Your Local Pharmaceutical Committee (for details go to <http://www.lpc-online.org.uk/>); or
- For National Pharmacy Association (NPA) members, the NPA Pharmacy Services team has produced a [brief guide](#), a [template standard operating procedure \(SOP\)](#) and a [Frequently Asked Questions resource](#) to assist members in implementing the Accessible Information Standard. For more information, please contact the Pharmacy Services team on 01727 891 800 / 0330 123 1035 or email [pharmacyservices@npa.co.uk](mailto:pharmacyservices@npa.co.uk)

## About Us

### Pharmacy Voice

Pharmacy Voice is an association of trade bodies bringing together and speaking on behalf of community pharmacy in England. Formed by Association of Independent Multiple pharmacies, the Company Chemists' Association and the National Pharmacy Association, together we are a stronger, unified voice for community pharmacy, speaking for the contractors of some 11,000 pharmacies that together employ around 80,000 people.

### Pharmaceutical Services Negotiating Committee

PSNC promotes and supports the interests of all NHS community pharmacies in England. We are recognised by the Secretary of State for Health as the body that represents NHS pharmacy contractors. We work closely with Local Pharmaceutical Committees (LPCs) to support their role as the local NHS representative organisations.

Our goal is to develop the NHS community pharmacy service, to enable community pharmacies to offer an increased range of high quality and fully funded services that meet the needs of their local communities and provide value and good health outcomes for the NHS and the public. We work with NHS England and other NHS bodies, and with the Department of Health, to promote opportunities for the development of community pharmacy services, and negotiate the contractual terms for the provision of NHS community pharmacy services.

## **Appendix 1 – Example wording for updating materials to ask whether a patient has information or communication support needs**

In addition to asking patients if they require any reasonable adjustments to be made when before providing a clinical service such as a Medicines Use Review, we recommend that you update your website, consultation room information signs and patient information forms in due course. This will help patients to be proactive about asking for the support and adjustments they need ahead of their appointments.

You can change the example text to suit your practice's needs, and do not hesitate to contact your organisations listed under **Further Information** on page 3 if you have any queries.

### **Website:**

If you have specific information or communication support needs, please let us know in advance.

*You may also wish to say that you will do your best to meet these needs and/or what reasonable adjustments you can offer.*

### **Wall sign:**

If you have a specific information or communication support needs, please let us know.

*You may also wish to say that you will do your best to meet these needs.*

### **Patient information forms:**

Do you have any specific information or communication support needs?

Yes/No

If yes, please specify (e.g. I need to lip read; I need to receive written information by email; I need BSL interpretation.)