

WELSH GOVERNMENT INTEGRATED IMPACT ASSESSMENT

Title of proposal:	Accessible Communication and Information Standards
Official(s) completing the Integrated Impact Assessment (name(s) and name of team):	Lewis Owen Equality Team – Health, Social Care and Early Years Group
Department:	Health, Social Care and Early Years Group
Head of Division/SRO (name):	Emma Spear
Cabinet Secretary/Minister responsible:	Cabinet Secretary for Health and Social Care
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CONTENTS

Section 1. What action is the Welsh Government considering and why?	3
Section 8. Conclusion.....	7
Section 9. Declaration	11

SECTION 1. WHAT ACTION IS THE WELSH GOVERNMENT CONSIDERING AND WHY?

(Please note that this Section will be published)

In narrative form, please describe the issue and the action proposed by the Welsh Government. How have you applied / will you apply the five ways of working in the Well-being of Future Generations (Wales) Act 2015 to the proposed action, throughout the policy and delivery cycle?

Please keep within 1,000 words. The kind of questions you should be looking to answer will include, for example:

The Welsh Government are broadening and renewing the All-Wales Standards for Accessible Communication and Information for People with Sensory Loss. In 2023, the Welsh Government reviewed the effectiveness of the Standards, and explored the barriers faced by people when accessing healthcare. In collaboration with representatives from NHS Wales and external partners, the Welsh Government developed recommendations and actions aimed at removing barriers and ensuring the communication and information needs of patients, service users, parents and carers are consistently met.

The renewed Standards will now also include patients whose main language is not English or Welsh; patients who have language and communication barriers due to disability, dementia, mental health conditions or learning difficulties; patients who have language and communication barriers arising from neurodivergence; patients who have language and communication barriers arising from low literacy; and parents and carers (of patients) who have language or communication barriers.

The Standards are also accompanied by the *Standard Operating Procedure: commissioning interpretation and translation services in primary and emergency healthcare (SOP)* and the *Accessible Information Standard (AIS)*. The SOP is a comprehensive guidance document for NHS staff to ensure that consistent quality and standards are upheld when commissioning interpretation and/or translation services. The AIS directs and defines a specific and consistent approach to identifying, recording, flagging, sharing and meeting the information and communication needs of patients, service users, carers and parents for GP practices; it was issued via Welsh Health Circular in 2018 and has been integrated into these Standards for consistency. Together, these will help deliver consistent equitable services to support access and improve patient experiences and outcomes.

The Standards align with the principles of the Well-being of Future Generations (Wales) Act 2015, which emphasises long-term thinking and aims to improve the social, economic, environmental, and cultural well-being of Wales.

In the **long term**, there may be opportunities for the Standards to be facilitated more effectively with the procurement of NHS systems which would allow for easier transferal of information. Closer cooperative working between NHS bodies could also easily facilitate the effectiveness of the Standards.

There could also be challenges to the implementation of these Standards, such as increased pressures on NHS bodies, as well as insufficient IT systems within these bodies. Though, these are existing challenges that have been known for some time, and the Standards have been drafted cooperatively with stakeholders to allow for implementation despite this. This includes the measures and indicators, which we have tested with NHS bodies to ensure that they are achievable (although also recognising that further work is needed to support data collection) and will allow for progress to be measured effectively.

By ensuring that healthcare services are accessible to individuals with additional communication and information needs, the standards promote equitable access to healthcare. This helps to reduce health disparities and ensures that all individuals, regardless of their communication needs, can receive timely and appropriate medical care. The standards emphasise the importance of capturing, retaining, and sharing accurate patient information to ensure that healthcare providers can meet the communication needs of all patients. This leads to better health outcomes as patients are more likely to understand their health conditions, treatment options, and care plans – supporting a focus on **prevention**, as well as **integration** across services. In so doing, the Standards are also directly supporting the **Duty of Quality** – and its focus on providing safe, timely, effective, person-centred equitable and efficient care.

The document also highlights the legal duty under the Equality Act 2010 to make reasonable adjustments to deliver equality of access to healthcare services. This proactive approach ensures that public bodies anticipate and address the needs of individuals with additional communication needs, thereby promoting dignity and respect.

The Standards address the needs of under-served populations, such as those with sensory impairments, neurodivergent individuals, and those with limited proficiency in English or Welsh. By ensuring that no patient is left behind due to communication barriers, the Standards help to reduce health inequalities and promote social inclusion. This approach supports **sustainable development** by promoting equality and reducing socio-economic disparities, which are critical components of breaking the cycle of poverty and poor health.

The Standards include provisions for regular review and monitoring – with **involvement** from key partners – and with progress reported to the NHS body's Board and Executive Team. This ensures that the Standards are continuously improved and adapted to meet the evolving needs of patients as well as the services themselves.

By embedding equality and human rights in the healthcare system, the standards support the delivery of equitable services and contribute to the long-term sustainability of healthcare provision.

The Standards have an overarching objective of ensuring that patients and/or their parents or carers who have additional communication and information needs can access health services without barriers or increased difficulty. This fosters a sense of trust and safety within the healthcare system, encouraging patients to seek care when needed and participate actively in their healthcare decisions, and ensures that patient safety is put first. This can lead to a decrease in health inequalities for certain groups as they will be able to easier access services to address their healthcare needs.

Throughout the process of renewing and broadening the Standards, **collaboration** has been key with various stakeholders, including:

Welsh Government Policy Teams

NHS Wales Executive (now NHS Wales Performance and Improvement)

Aneurin Bevan University Health Board

Betsi Cadwaladr University Health Board

Cardiff and Vale University Health Board

Cwm Taf Morgannwg University Health Board

Hywel Dda University Health Board

Powys Teaching Health Board

Swansea Bay University Health Board

Velindre University NHS Trust

Welsh Ambulance Services University NHS Trust

Public Health Wales

British Deaf Association

Learning Disability Wales

Lleisiau Dementia

Royal National Institute of Blind People

Royal National Institute for Deaf People

Swansea University

Wales Interpretation and Translation Service

Regular stakeholder sessions have been held since 2023 to progress this work and ensure that a range of voices and perspectives are taken into account. Collaboration has also been undertaken with those with lived experience to ensure that the Standards are fit for purpose in serving those with additional communication and information needs.

In terms of impact, these Standards are already in place as the All-Wales Standards for Accessible Communication and Information for People with Sensory Loss since 2023, as well as the Accessible Information Standard since 2018. NHS bodies in Wales should already have been implementing these, with the broadening of these Standards building on this existing work. The broadening of the Standards will mean that more people who experience barriers to healthcare relating to communication will be able to better access services, leading to a reduction in health inequity for these groups.

The Standards will be issued via Welsh Health Circular to all NHS bodies in Wales upon their publication.

SECTION 8. CONCLUSION

(Please note that this section will be published)

8.1 How have people most likely to be affected by the proposal been involved in developing it?

In-keeping with the Well-being of Future Generations (Wales) Act 2015, the Welsh Government is committed to involving people. Following ministerial approval to broaden and renew the Standards, the Welsh Government worked collaboratively with these stakeholders to develop the recommendations and actions aimed at removing barriers and ensuring the communication and information needs of patients, service users, parents and carers.

The stakeholder group encompassed a broad range of individuals, including those with protected characteristics and those possessing lived experiences. The inclusion of these diverse perspectives was paramount to the development of renewed standards that genuinely addressed the needs of the affected populace. Our stakeholders represent all service users from various population groups, and these will include children and young people. When we have received feedback and input from stakeholders, they have been responsible for providing insight and consideration for their service users who are children and young people, and considering how best the renewed Standards can improve outcomes for them in accessing healthcare services.

The integration of recommendations from the Hear 2 report was particularly important, ensuring that the lived experiences of people seeking sanctuary and refugees accessing health services were considered. Language barriers were consistently cited as one of the greatest challenges facing people seeking sanctuary, particularly difficulties with interpreting and translation¹ - an issue that was also raised when the Welsh Government consulted on the draft Race Equality Action Plan in 2021. This holistic approach aimed at not only identifying but also addressing the unique challenges faced by these individuals.

Moreover, Welsh speakers were also included in the working group. Welsh language policy officials were consistently informed and involved in the process to ensure that all decisions made were in alignment with the ambitions of the '[Mwy Na Geiriau](#)'. This policy aims to promote the use of the Welsh language in public services and ensure that Welsh speakers can access services in their preferred language. By involving Welsh language policy officials, the working group ensured that the renewed standards would support and

¹ [PHW-Swansea-HEAR-technical-report-FINAL.pdf](#)

enhance these linguistic goals, providing a more inclusive and culturally respectful framework for communication within healthcare services.

8.2 What are the most significant impacts, positive and negative?

The Standards highlight several positive impacts that will have long-term effects on service users. The Standards will ensure that healthcare services are accessible to all users, including those with additional communication and information needs. Equity of access is essential in ensuring that health inequalities are reduced, and evidence gathered demonstrates that the Standards can have this impact on services across Wales if implemented effectively. When service users can understand the communication between them and their healthcare provider, they are less likely to miss appointments, and can better understand any treatment information, thus deepening a sense of trust in services, which in turn could lead to a greater uptake in services in future.

The impact on children and young people is also very positive, with the requirement on many of them having to interpret for family members being removed, taking away this pressure from them.

The overarching ambition of the Standards and their implementation will encourage respectful and considered communication with all service users, fostering a positive and trusting environment for both service providers and users. Under the Duty of Quality all NHS bodies in Wales should ensure the decisions they make deliver care that is safe, timely, effective, efficient, equitable and person-centred.

The definition of 'Equitable' in the [Welsh Government's statutory guidance](#) is as follows:

Our health care system provides everyone with an equal opportunity to attain their full potential for a healthy life which does not vary in quality by organisation providing care, location where care is delivered or personal characteristics (such as age, gender, sexual orientation, race, language preference, disability, religion or beliefs, socio-economic status or political affiliation). We embed equality and human rights in our health care system.

And the definition of 'Person-centred' in the Welsh Government's guidance is as follows:

Our health care system meets people's needs and ensures that their preferences, needs and values guide decision-making that is made in partnership between individuals and the workforce. We care about the well-being of individuals, their families, carers and our staff. We ensure that everyone is always treated with kindness, empathy and compassion and we respect their privacy, dignity and human rights. We are committed to working better together to put people and their families at the centre of decisions, seeing them as experts working alongside professionals to get the best outcome and experience.

By promoting communication based on respect and collaboration, the Standards create an atmosphere conducive to effective and empathetic healthcare delivery that is, at its core, equitable and person-centred.

The Standards will have a significant positive impact on social, cultural, and linguistic well-being, ensuring that all users can access healthcare services easily and effectively, without additional barriers. This inclusive approach is key to the success and effectiveness of the Standards, making healthcare services more accessible and equitable for everyone.

The development of the Standards involved a comprehensive and inclusive approach to ensure that the needs of all users were considered. Several key aspects were highlighted during this process. Firstly, extensive consultations were held with various stakeholders, including individuals with sensory impairments, learning disabilities, and those experiencing communication barriers due to language differences. This ensured that the Standards were tailored to address the specific needs and challenges faced by these groups. Additionally, there has been significant collaboration with NHS bodies and third sector groups representing those with lived experience to identify and dismantle barriers that prevent people from accessing health services. This collaborative effort contributed to the creation of a more inclusive and accessible communication and information framework that has led to the coproduction of the Standards themselves. Feedback and input from users, healthcare providers, and advocacy groups were also integral to shaping the Standards. This allowed for the Standards to be practical, effective, and responsive to the needs of all users.

The Standards underwent pilot testing in various settings to assess their effectiveness and identify areas for improvement. The feedback obtained during this phase enabled adjustments to be made before the final implementation of the Standards.

Ongoing engagement with users and stakeholders has been maintained to ensure the continued relevance and effectiveness of the Standards. This continuous feedback loop facilitated necessary updates and improvements over time. By involving people throughout the development process, the Standards are able to comprehensively address the diverse needs of users and ensure that healthcare services are accessible to everyone.

8.3 In light of the impacts identified, how will the proposal:

- **maximise contribution to our well-being objectives and the seven well-being goals; and/or,**
- **avoid, reduce or mitigate any negative impacts?**

Creating accessible communication opportunities for patients in the NHS directly supports and aligns with the principles of the Well-being of Future Generations (Wales) Act 2015 (The Act). The Act emphasises the importance of long-term thinking and aims to improve the social, economic, environmental, and cultural well-being of Wales. By ensuring communication within the NHS is accessible to all patients, including those with learning disabilities or language barriers, NHS Wales will be able to deliver a more inclusive and equitable healthcare system.

A key goal of The Act is to create “A Healthier Wales”. Accessible communication ensures all patients, regardless of their communication needs, can fully understand their health conditions, treatment options, and care plans. This empowerment, through understanding leads to better health outcomes, as patients are more likely to follow medical advice, adhere to medication regimens, and engage in preventative health measures when they understand fully the information provided to them. Additionally, accessible communication fosters a sense of trust and safety within the healthcare system, encouraging patients to seek care when needed and participate actively in their healthcare decisions.

Furthermore, the Act promotes equality and reduces socio-economic disparities, which are critical components of sustainable development. By providing accessible communication, NHS Wales addresses the needs of under-served populations, such as those with sensory impairments, neurodivergent people, those with learning disabilities, or limited proficiency in English or Welsh. This approach ensures that no patient is left behind due to communication barriers, thereby reducing health inequalities. It also supports the cultural well-being of Wales by respecting and accommodating the linguistic diversity of its population, including the use of Welsh, as well as BSL and community languages.

There are no identified negative impacts to be mitigated as a result of these renewed Standards being published and implemented.

8.4 How will the impact of the proposal be monitored and evaluated as it progresses and when it concludes?

The governance and monitoring of the renewed Standards have been significantly updated and developed to ensure greater robustness and effectiveness. Each NHS body is now mandated to appoint a responsible officer tasked with overseeing the implementation and monitoring of the Standards within their respective institutions. This governance structure necessitates a thorough review of the Standards every two years, providing an opportunity for relevant stakeholders and responsible officers to make any necessary revisions.

Furthermore, the renewed Standards incorporate comprehensive measures and indicators (as detailed in annex B). All NHS bodies are required to report their progress against these measures and indicators to the Welsh Government as part of their strategic equality plan policy assurance reports. These measures and indicators are aligned with the Patient Experience Framework, ensuring that the impact and progress are closely monitored. This

approach allows for timely amendments during the review periods, thereby ensuring continuous improvement in the standards of care and communication within NHS Wales.

SECTION 9. DECLARATION

Declaration

I am satisfied that the impact of the proposed action has been adequately assessed and recorded.

Name of Senior Responsible Officer / Deputy Director: Emma Spear

Department: Health, Social Care and Early Years Group

Date: 08/08/2025