

## 1. Introduction

This report briefly summarises how the Equality Impact Assessment on the Translation & Interpretation Policy was undertaken, its scope and the key findings.

## 2. Process

The assessment was undertaken by 3 officers from Housing, HR and Customer Services and facilitated by the council's Equality & Inclusion Consultant. The assessment required two meetings plus some time for members of the team to check or research some points that arose and time to complete the forms.

## 3. Findings

This policy sets out how we will meet the need to provide some customers with additional help and support in order that they can find out about, use and be consulted about our services. It covers the use of different **languages**, including British Sign Language, and also need for different **formats** to be readily available to disabled people. It is based on the requirements of the Disability Discrimination Acts of 1995 and 2005 and 'Guidance for Local Authorities on Translation of Publications' December 2007, issued by the Department for Communities and Local Government.

The policy sets out how WCC will provide an interpreting service and translation of documents in other languages or formats where customers are unable – or find it difficult – to communicate effectively in English and/or read documents needed to enable them to find out about, use or be consulted about services. Including:

- Providing a professional interpretation service to all customers requesting it.
- Translating documents into the main other languages used in the district on request and into other languages where this is necessary, practicable and affordable.
- Monitoring take up of interpretation and translation services so that we can identify the languages requested, demand for other formats and identify which services are affected.
- Working with other district councils, the county council and other partners to develop a co-ordinated approach to meeting customers' communications needs.

The primary aim of the policy is to provide appropriate, timely and effective assistance and support to customers whom our usual methods of communication may disadvantage. The policy is intended to avoid discrimination, reduce or eliminate disadvantage and promote equality. The assessment found positive impacts on all Customer Groups.

An overall accessibility issue was found which affects all council services, in that some customers are unable to access services using all of the "access channel" provided by the council. For example, written information may be difficult for a customer with a visual impairment.

This point was addressed by the Communications EIA (which also addressed the accessibility of the Website) and the principle agreed that it is not feasible to make all methods of communication accessible to everyone, but that **providing there are alternatives available**

**and that these and appropriate help and support are offered to customers** no discrimination or disadvantage will occur. For example, the other options available to a customer with a visual impairment would be to receive information in Braille, large print or audio or digital form, to discuss the service over the telephone or receive a home visit.

The **recognised local language** element of the policy – which says that key documents will only be automatically be translated into a limited number of languages - could possibly disadvantage people whose language is not included as part of this list. However, the policy provides for **interpretation** into all languages on request and for **translation** into other languages under certain circumstances. The list of recognised local languages will be regularly reviewed.

The policy sets out that **only key documents** will be translated automatically on request, but provision is made for summaries of documents to be provided and that interpreters will always be provided for any language.

**Charging** for translation for non key documents and for translation into non recognized local languages might disadvantage those on low incomes or benefits, but flexibility is built into the policy to enable officers to use their discretion to waive the charges in some circumstances.

The policy aims to take account of peoples needs as far as is practical and possible in line with government guidance that it is in the interests of all members of the community to be able to communicate in English and doing so will promote equality, social inclusion and social cohesion.

#### **4. Key Recommendations**

Customer-facing staff should receive appropriate training to enable them to communicate effectively with disabled customers and other customers with specific communication needs.

A central record of which documents have been translated into which languages should be maintained and the information made available to all officers.

Opportunities to share translated documents with other public bodies should be explored to reduce costs.

#### **5. Monitoring**

Use of the Big Word service should be monitored.

#### **6. Conclusions.**

The assessment found that the policy had no negative impacts on any group and many positive impacts.

##### **6.1 Detailed Assessment**

A detailed assessment is not required.

##### **6.2 Improvement Plan**

Proposals on training and monitoring are given in the attached action plan.

**Form 3. Improvement Plan**

Service or Policy to be improved	Responsibility	Priority	Performance Measure	Year	Min Std	Target
Translation & Interpretation Policy	Head of organisational development					
Actions Required to Achieve Improvement	Responsibility	Target Date	Resource Implications			
<p><b>Training</b></p> <p>A range of equality awareness training for all front line which provides skills based training on a customer care approach for different customer groups.</p>	Head of organisational development					
<p><b>Monitoring</b></p> <p>Quarterly monitoring by type of format of</p> <ul style="list-style-type: none"> <li>• Frequency of take up</li> <li>• Cost</li> </ul>	Head of organisational development	Quarterly	<p>Feedback to Resource Scrutiny Committee.</p> <p>Process to be designed, possibly through CSC, and linking into Powersolve to monitor council's usage of:</p> <ul style="list-style-type: none"> <li>• Large print – using in house Design &amp; Print</li> <li>• Interpreters – using Access to communication</li> <li>• Signers – using Team Communications</li> </ul> <p>Big Word will provide periodic reports on:</p> <ul style="list-style-type: none"> <li>• Translation by language</li> <li>• Audio</li> <li>• Braille</li> <li>• Easy read</li> </ul>			

Translation & Interpretation Policy Equality Impact Assessment

Regular review of recognised local languages.	Head of organisational development	Quarterly	Process to be determined possibly linked in with the outcome of the above action
<p><b>Prepared response</b></p> <p>Prepare response should negative comments be received about the time and money being spent on what is perceived as a minority of the district community.</p>	Communication Team		<p>Comms team to draft an appropriate response.</p> <p>Comms Team to circulate the response as appropriate to enable officers to defend the councils approach effectively to meeting the needs of all its customers.</p>
<p><b>Letterhead Icon or symbol</b></p> <p>Investigate the availability of an icon or symbol which quickly and easily identifies the council as being able to make provision for customers with additional needs.</p>	Communication Team		<p>May be difficult to identify one icon which symbolises the assistance offered to all the different customer groups by the Council.</p> <p>If successful the symbol should replace the paragraph currently featured on the reverse of the letterhead.</p>
<p><b>Intranet Guidance</b></p> <p>Improve access through the intranet to the equality policies and procedures, strategies and guidance.</p>	Communication Team	March 09	