

HFI Policy

Interpreting and translation policy

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Introduction

1.1 Homes for Islington aims to provide excellent services to all of our residents, including those whose first language is not English, who have a visual or a hearing impairment. The overall aim of this policy is to provide better access to services for our residents and will be communicated widely to our residents and staff.

2.0 Scope and definitions

2.1 The policy is aimed at all residents who need to access Homes for Islington services and who identify a need for assistance in a language other than English. Languages include sign language for Deaf and hard of hearing residents, spoken and written non-English languages as well as audio/ written information, which is adapted for residents who are visually impaired.

2.2 The term 'main community languages' is used in the policy and procedure to mean those languages identified by Homes for Islington as the ones most frequently used or requested amongst residents.

2.3 'Interpreting' and 'translating' refer to changing from one language into another and the terms are sometimes used interchangeably. However 'interpreting' is usually about the spoken word, and 'translation' is usually about a written change of language.

3.0 Legal and regulatory framework

3.1 The Tenancy Services Authority is the regulatory framework for social housing from April 2010 introduced a common set of standards that applies to all social housing providers.

3.2 The Tenancy Empowerment and Involvement standard describes the outcomes landlords should deliver and demonstrate how they respond to tenants' needs in the way they provide services and communicate with tenants

- 3.3 This standard has a required outcome in respect of understanding and responding to the diverse needs of tenants.
- 3.4 It states that providers will treat all tenants with fairness and respect and demonstrate that they understand the different needs of tenants, including in relation to the seven equality strands and tenants with additional support needs.
- 3.5 It specifies that providers may need to adjust services for tenants who need extra help due to their age, disability, race, ethnicity, religion, gender, sexual orientation or care and support needs.
- 3.6 Key legislation relevant to this policy includes the Equalities Act 2010 introduced on 8 April 2010 which introduces 2 new duties for public bodies:
- to stop people doing less well than other people because of their family background or where they were born.
 - to treat people from different groups fairly and equally including women and men, people of different races, disabled people, people with different religions or beliefs or with no religion or belief, people of different ages, lesbian, gay and bisexual and straight people and people who have changed their sex or in the process of doing so.
- 3.7 the Equality act will harmonise previous discrimination law: The prohibition in directly or indirectly discriminating "because of a protected characteristic" will cover age, disability, sex, gender reassignment, sexual orientation, race, religion or belief and, in many but not all instances, marriage and civil partnerships. Disability-related discrimination will be replaced with a prohibition on discriminating against a disabled person by treating them unfavourably where that treatment is not a proportionate means of achieving a legitimate aim.

4 Equality and Diversity

- 4.1 This Interpreting and Translation Policy and related procedures are one part of Homes for Islington's overall equality and diversity strategy. Based on an equality impact assessment, they are seen to have an overall positive effect on addressing inequalities in the following groups:
- Deaf / hearing impaired users of BSL (British Sign Language)
 - Non-English speakers (usually from minority ethnic groups)
 - Customers who are visually impaired

- 4.2 Officers will have due regard for the [Diversity and IT codes procedure](#) when dealing with any HFI residents. Officers shall ensure that any access needs are taken into account when dealing with residents, checking iWorld for any translation or vulnerability codes and other relevant information. If diversity information is missing from iWorld or if the information has not been updated within the last two years officers should take an appropriate opportunity e.g. when interviewing the resident to complete the [valuing diversity customer information collection form](#).

5.0 Health and Safety

- 5.1 When arranging face-to-face interpreters (eg. for home appointments) the same [personal safety](#) considerations as used by HFI staff should be applied.

6.0 Responsibilities

- 6.1 All staff are responsible for responding to the non-English language needs identified by residents and for the implementation of this policy and related procedures.
- 6.2 Managers are responsible for monitoring the pro-active implementation of this policy and procedure at the point of contact with residents. Managers are also responsible for monitoring the budget related to interpreting, monitoring the service standards of suppliers and reporting these quarterly to the Service Development Team.
- 6.3 The Service Development Team is responsible for arranging the translation of corporate information and monitoring the associated budget.
- 6.4 The Service Development Team is responsible for arranging for translated information to be placed on the intranet.
- 6.5 The Communications Team are responsible for the language accessibility of the HFI website.

7.0 Identifying individual needs

- 7.1 We will identify where a new tenant has a non-English language need or is visually impaired and provide an interpreter / audio tape at tenancy sign-up. We will keep information on language and disability needs and on resident's individual records to help us provide materials in the most appropriate language and format.
- 7.2 We will make every effort to provide all customers with information in their first language when requested, usually through an interpreter or by providing a written translation (eg. of an individual letter or document). In most cases, even if the customer is requesting a written

translation, the starting point should be a conversation in their first language to establish needs and whether a translation is appropriate or necessary.

7.3 We will make every effort to provide all customers with information in a form that is accessible and this can be in to them for written information to be made available in large print, Braille, tape or CD for our blind or visually impaired customers.

7.4 We will support consultation and resident involvement with all residents, by interpreters as required.

8.0 English language courses

8.1 Homes for Islington will support and encourage residents whose first language is not English and who wish to improve their English language skills to do so. This will include:

- Publicising local opportunities to learn/improve English
- Publicising the London Borough of Islington's website details relating to free courses across the borough. and whose site can be accessed by clicking on acl@islington.gov.uk or phoning 020 7527 5782

9.0 Interpreting services

9.1 We will aim to provide telephone interpreters within 10 minutes and face-to-face interpreters within 7 working days.

9.2 HFI staff members may be used as interpreters for ease and speed of communication, by agreement with the resident, but we will always arrange a professional interpreter for longer or more complex interviews.

9.3 We will not use children under the age of 16 as interpreters when dealing with sensitive and confidential issues such as rent arrears, eviction, domestic violence, anti-social behaviour or harassment.

9.4 We will provide an interpreter, when requested, for Deaf / hard of hearing customers who use British Sign Language (BSL). We will aim to provide an interpreter within 7 working days (though note that this period may need to be extended due to demand and shortage of BSL interpreters).

10.0 Staff as interpreters

10.1 Staff with non-English language skills will be encouraged to use them to provide a responsive service to residents. Training in the basic skills and good practice of interpreting will be made available to those staff.

10.2 A database of staff language spoken and written skills will be held centrally by the service Development Team and made available to all staff.

11.0 Translation Services

11.1 Where customer requests written information translated into a non-English language HFI will initially look to see if it may be more appropriate to have a conversation with the customer about their requirements; for example, a verbal explanation of the contents of a leaflet may be more appropriate and useful than a written translation. Often, a customer's request may be linked to a specific question or service request that they have.

11.2 If the customer's preference is written information HFI's aims will be to provide this but will be subject to assessment of the cost of translating written material, and services may be declined if the cost is excessive.

11.3 Local requests for short written translations (eg. letters) will be provided within 5 working days, with longer HFI documents (leaflets etc) within 10 working days. A faster service can be provided if appropriate, but immediate needs for information will usually be provided through (spoken) interpreting services. The conversation will also be used to identify in more detail any written translation requests.

11.4 HFI recognises that Deaf / hard of hearing customers who use sign language may prefer or need to have written information provided in simplified grammar or via a sign interpreter. HFI will aim to provide such services, subject to cost assessment.

11.5 When requested we will arrange for written information to be made available in large print, Braille, tape or CD for our blind or visually impaired customers. Again, requests are subject to a cost assessment.

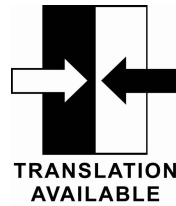
12.0 Publicity

12.1 We will publicise the services in the external publications e.g. newsletters and fact sheets and on the HFI web-site. Corporate leaflets will contain a simple sentence in the main community languages indicating whom to contact with the sentence:

- "If you have any questions/comments or would like this document in large print or Braille, audiotape or in another language, please contact your area housing office."

12.2 HFI will use an HFI 'translation symbol' alongside such publicity to remind residents of the interpreting and translation services.

- 12.3 The HFI website will allow residents to click on a link to translated pages that explain the interpreting and translating service, and show the translated leaflets and documents already available.



13.0 Languages

- 13.1 Homes for Islington analysed the main non-English languages identified by residents as their preferred languages and the records of interpreting and translation records and have decided to continue to use the existing community languages as set out below.

- Bengali
- Greek
- Portuguese
- Somali
- Spanish
- Turkish

- 13.2 The list of 'community languages' will be reviewed after the publication of the 2011 census survey results by the Service Development Team and the Equality and Diversity Forum will be asked to approve any changes.

14.0 Interpreting budgets

- 14.1 Each area office, reception centres, property services and other customer facing departments have an interpreting budget for providing localised services to individuals, including telephone interpreting, face-to-face interpreting and individual translations (of letters etc).

- 14.2 In line with partnership working, HFI will also support and finance telephone interpreting services for the following:

- Our main repairs contractors
- Tenant Management Organisations

15.0 Central translation budget

- 15.1 A centralised translation budget is held by the Service Development Team for translating documents for general distribution such as the most popular leaflets, articles for newsletters, annual reports etc. Such 'pro-active' translations will be selective and mindful of costs.

- 15.2 Translated general documents will be made available on the internet and will build up over time.