

Translation and Interpretation (T and I) Policy

1. Introduction

- 1.1 The council has a responsibility and commitment to ensuring that residents and customers can access council services. For those residents and customers who have difficulty communicating in English, whether due to language barriers or disability, access is enabled through our translation and interpretation service.

2. Aim

- (i) The aim of the T and I policy is to detail a coordinated, considered and responsive strategic framework for the operational delivery of translation and interpretation services across the council.
- (ii) A [TIS user guide](#) has been developed to assist staff in making T and I related decisions and it also details how to operationally access the T and I service.

3. Legal and policy context for the provision of translation and interpretation

3.1 Translation and interpretation provision relating to disability

The number of Lambeth residents who are hearing impaired and require signers is unknown. According to Action on Hearing Loss (formerly the RNID) the number of deaf and hard of hearing adults in the UK is 8,945,000, of which 688,000 have severe to profound hearing loss. This equates to 1 per cent of the population, and on this basis we would expect 2,745 of Lambeth residents to have a severe or profound hearing impairment.

The number of residents who are registered as severely sight impaired is also unknown. Nationally, according to RNIB, there are 307,000 people in England registered as severely sight impaired (blind) or partially sighted. This equates to 1,225 per 200,000 people and on this basis we would expect 1,634 of Lambeth residents to be registered as such.

The Disability Discrimination Act 1995 and 2005, now harmonised within the Equality Act 2010, requires the council to ensure disabled people have access to goods, facilities and services. Reasonable adjustments to ensuring such access include: Braille translations, British Sign Language translators, hearing loops, tactile signs and visual and audio prompts.

3.2 Translation and interpretation provision relating to non-English speakers

Within Lambeth over 130 languages are spoken, with the predominant languages being Portuguese, Somali, Spanish, Polish and French. It is imperative that the council provides a translation and interpretation service which enables residents and customers who have difficulties communicating in English to access key council services.

The Equality Act 2010 requires the council to ensure that protected characteristics¹ have access to goods, facilities and services. The provision of translation and interpretation services ensures non-English speaking racial / ethnic groups do not face disadvantage in accessing our services.

Additionally, the public sector Equality Duty, contained within the Act, requires public authorities to:

- eliminate discrimination
- advance equality of opportunity
- foster good relations.

This policy contributes to the council meeting these requirements by enabling all residents / customers to access council services encouraging participation in public life. Failing to provide a translation and interpretation service in certain essential circumstances, such as someone presenting as homeless or applying for a benefit, would put us in breach of the legislation.

The Department of Communities and Local Government's report, [Guidance for Local Authorities on Translation of Publications 2007](#) provides guidance. The report supports the rejection of automatic translation in favour of a more selective approach, where translation is targeted to particular needs. This ensures that resources are targeted effectively; a necessity given the increasing pressures on local authorities to provide 'value for money' against a backdrop of enforced savings.

According to the Commission on Integration and Cohesion's report, [Our Shared Future 2007](#), good English skills are also vital to finding jobs and participating in society; it also encourages financial and social inclusion. Additional benefits include fostering citizenship, being able to highlight health concerns with medical staff and taking part in

¹ The protected characteristics include: age, race, disability, sexual orientation, sex, religion and belief, gender reassignment, marriage & civil partnership and pregnancy & maternity.

democratic processes. Consequently, our policy acknowledges the role of a local strategy to promote English language skills.

4. Objectives of the T and I policy

The objectives of Lambeth Council's T and I policy are to:

- a. Enable all residents / customers to be active citizens and have access to opportunities available within the borough.
- b. Ensure that residents / customers who have difficulty communicating in English are not disadvantaged in accessing key council services such as housing, benefits and adult services.
- b. Enable residents to take part in the democratic process, for example registering to vote or participating in decision-making processes such as consultation.
- c. Enable residents / customers to effectively participate in society by ensuring that they understand local rules e.g. rubbish disposal and parking restrictions.
- d. Support community cohesion and promote good relations between residents / customers; being unable to communicate in English is seen as a significant barrier to developing positive relationships amongst neighbourhoods².
- e. Enable council officers, councillors and any partners to communicate with residents / customers who have difficulties communicating.

5. Policy commitments

To ensure that the delivery of T and I services across the council is coordinated, considered and responsive, we will:

- i. Reject automatic proactive translation of documents in favour of a more selective approach, where translation is targeted to particular needs, ensuring that resources are used effectively.
- ii. Ensure individual service EIAs consider the role of T and I in relation to the specific nature of the service. This will enable the delivery of T and I in manner which is most appropriate to the needs of customers accessing a particular service.
- iii. Sign-post residents who access T and I services to ESOL courses available within the borough to support and encourage residents to improve their English skills.
- iv. Continue with the provision of ESOL to residents, as resources allow. Given that Lambeth is the welcoming borough to a high percentage

² [Our Shared Future 2007](#)

of immigrants, it is anticipated that demand for ESOL will remain constant. Further information can be found from:

www.lambeth.gov.uk/Services/EducationLearning/AdultLearning/LambethAdultLearningService.htm

- v. Promote our T and I service to residents / customers through the use of translation panels on key council publications.
- vi. Ensure the council's frontline staff are aware of the T and I policy, guidance and procedure through a combination of communication channels (including team inductions, team meetings, and the council's intranet).
- vii. Harness the opportunities technology presents for translation and interpretation to improve the customer experience and potentially reduce the number of translation requests. For example, payment kiosks in the cashiers' office will include translated scripts and the web team are exploring integrating the Google translate tool into the council's website.
- viii. Ensure that the translation and interpretation service contract is sufficiently flexible to enable partners and organisations involved in Co-operative Council initiatives to access the service.
- ix. Make provision for front line staff to provide interpretation where appropriate.
- x. Make every effort to provide customers with information in their preferred language through the most appropriate means, including translations, interpreters (including British Sign Language interpreters and sign supported English) or in their preferred format (i.e. Braille, large print).
- xi. Display Language Identification Cards and hearing loop induction availability at customer service reception desks to make it easier for customers to identify their communication needs.
- xii. Use plain English³. This means clearly explaining technical terms and avoiding jargon at all times, to ensure our communications are accessible and reduce the need for translations.
- xiii. Consider using picture campaigns to communicate with customers where feasible. By using visual imagery, materials can communicate key information to people with limited English skills.
- xiv. Staff organising events will establish a need for BSL interpreters to attend events rather than assuming they will be required.

³ www.plainenglish.co.uk, email: info@plainenglish.co.uk or call 01663 744409.

6. Managing the translation and interpretation service

6.1 Scope of the service

thebigword has been awarded a three-year contract⁴ to provide translation and interpretation services across the council, including the council's arms length housing management organisation, Lambeth Living.

Lambeth schools have the option to access the council's contract with thebigword, through the CYPS's traded service offer, or they can make their own translation and interpretation arrangements.

6.2 Responsibilities

- (i) **Employees** are responsible for providing customers with access to the T and I service when required. As well as promoting ESOL classes or equivalent services that could assist residents / customers to learn English.
- (ii) **Line managers** are responsible for ensuring employees are aware of the procedure and guidance available to support staff accessing the council's T and I service. Managers are also responsible for making decisions on individual cases as to whether to provide translation or interpretation. Frontline service managers are also responsible for identifying any employees who can speak other languages proficiently and are willing to assist with basic interpreting.
- (iii) **Corporate Procurement** are responsible for managing the T and I service contract, including, value for money implications, quality assurance, satisfaction and monitoring of take up of the service. This team are also responsible for coordinating T and I service contract management meetings with key officers from across the council. Additionally, the team are responsible for ensuring that organisations / companies delivering services on behalf of the council adhere to this policy.
- (iv) **F&R equalities team** are responsible for producing a six-monthly briefing which analyses key performance and monitoring information. This will look to include data from multiple sources, such as management information from thebigword, the payment kiosks in the cashiers' office and metrics from Google translate⁵.

⁴ 2011-2014

⁵ If it's decided to proceed with integrating Google translate into the website.

- (v) **Policy, Equalities and Performance (PEP)** are responsible for ensuring that key T and I performance information, such as emerging communities or changing use of the service, informs key OCE functions such as communications, consultation, policy and equalities.
- (vi) **Campaigns and Communications** are responsible for:
 - Updating the translation panels when required to ensure panels accurately reflect the top five spoken languages in the borough.
 - Providing advice and guidance to officers/managers on when and how to translate documents.
 - Key council communication campaigns use plain English and are accessible.
 - Ensuring that the website is accessible and utilises accessibility enhancing technology.
- (vii) **Corporate Equalities Board** are responsible for reviewing the T&I service performance management reports on a six-monthly basis and providing strategic direction as required.

7. T and I service performance and contract management

- 8.1 The Corporate Procurement contract manager is responsible for convening contract meetings as and when required.
- 8.2 The F&R equalities and partnerships team is responsible for producing six-monthly policy briefings. The briefings will incorporate key performance and monitoring data such as a top ten languages requests and emerging trends.
- 8.3 The briefings will support contract management meetings and also be distributed to key teams across the council, including corporate communications and corporate equalities.