

Report for: Cabinet – 17th October 2023

Title: London Borough of Haringey Translation and Interpretation Policy

Report authorised by : Jess Crowe, Director of Culture, Strategy and Engagement

Lead Officer: Elliot Sinnhuber, Policy and Equalities Officer

Ward(s) affected: All

**Report for Key/
Non Key Decision:** Key Decision

1. Describe the issue under consideration

1.1 As part of its wider commitment to tackle inequality, Haringey Council is working to improve equity of access and outcomes and to proactively removing the barriers residents may experience when interacting with the council. Language can act as a barrier, and high-quality translation and interpretation (T&I) is essential to removing it.

1.2 Haringey Council does not have a translation and interpretation (T&I) policy. As a result, there is no consistent set of standards to guide officer decision-making on its use and to ensure residents receive support that meets their needs.

1.3 This report seeks approval of the proposed Translation and Interpretation Policy attached in Appendix 1. It sets out the council's approach to communicating with residents who do not use spoken or written English as their main language and provides a framework for the use of translation and interpretation services across the council.

2. Cabinet Member Introduction – Leader of the Council

We want to change our relationship with local people. We want to have open, collaborative and inclusive conversations with our residents – breaking down the 'us and them' divide, improving the quality and accessibility of local services and allowing residents to shape change in their lives and their neighbourhoods. That's the commitment we've made in the Haringey Deal.

Too often language gets in the way. Too many residents in our borough struggle with everyday local services because they aren't yet confident with English. It's an all-too-familiar story that many residents rely on children or other family members to get by. We know families are supportive, but every resident should enjoy the same right to confidential and independent access to services.

There are already huge inequalities in life chances and outcomes in this borough and language barriers only make these worse. We are committed to getting the basics right in

Haringey – having local services that are quick and easy to access and use – and a big part of that is having a clear plan to overcome language barriers.

We know there are thousands of residents who want to learn or improve their English. Many across London are sitting on waiting lists for language classes and can't afford to pay for private tuition. No one should be punished for that – they should be supported.

We've committed to expand ESOL (English for Speakers of Other Languages) classes in Haringey – and we can do a lot by referring residents to local community classes. That will make a real contribution, but we can't rely on ESOL alone. We have to recognise that there are plenty of times when translation is needed.

That's why we've created this policy and guidance. It sets out where digital translation can be used and where it's more appropriate to use a professional – for example where high-risk and complex issues are being talked about.

A commitment to collaboration and coproduction doesn't mean much without a clear plan for translation and interpretation. For too long many residents haven't really been part of decisions because we haven't engaged in a way that works. That is unjust – and it makes decisions weaker. We need deep engagement with communities that we can learn and build from.

We want to be a fairer and genuinely collaborative borough. That starts with common understanding.

3. Recommendations

3.1 It is recommended that Cabinet note and approve the Translation and Interpretation Policy attached in Appendix 1 which will come into effect from the 25/10/2023.

4. Reasons for decision

4.1 Haringey Council is committed to providing a high-quality public service, improving equity of access and outcomes, and proactively removing the barriers residents may experience when interacting with the council. High-quality translation and interpretation are critical to meeting these commitments to residents who are not confident English speakers.

4.2 The council does not currently have a translation and interpretation policy, and the lack of one may cause inconsistent decision-making around the use of translation and interpretation. This may negatively impact the access, experience and outcomes of residents using our services who are not confident English speakers who make up 7% of Haringey's population (19,000 residents). Additionally, the lack of a policy may result in missed opportunities for officers to effectively address resident concerns on the first interaction.

4.3 The policy will improve the quality and consistency of translation and interpretation across the council and support officers to proactively remove the language barriers that residents encounter. The aspiration is that this will improve resident experience and outcomes of our services.

4.4 This policy will also play a critical role in advancing the Haringey Deal particularly the commitments of:

- Knowing our communities - developing a better understanding of who our residents are, their strengths and needs, and how we can best work with them.
- Getting the basics right – ensuring residents' everyday interactions with the council are easy, effective and supportive.
- Working harder to hear the voices that are too often overlooked.

5. Alternative options considered

5.1 Not to develop a new translation and interpretation policy. This was rejected because while it is not a statutory document, effective translation and interpretation are critical to removing barriers, improving equity and meeting the following commitments in the Haringey Deal: getting the basics right and working harder to hear voices that are too often overlooked.

6. Background information

6.1 The development of this policy is driven by a range of existing and emerging bodies of work in the council that have a shared emphasis on equity and the elimination of barriers to service access.

- Prevention and community access – an emerging priority to setting principles and guidance about our approach to early intervention, prevention with an emphasis on equity.
- Resident experience - aims to improve and enhance the Customer Service Journeys for residents.
- Welcome strategy - includes an objective to develop and deliver welcoming services that treat everyone with dignity and respect.

The policy also seeks to advance the Haringey Deal particularly.

- Knowing our communities - developing a better understanding of who our residents are, their strengths and needs, and how we can best work with them.
- Getting the basics right – ensuring residents' everyday interactions with the council are easy, effective and supportive.
- Working harder to hear the voices that are too often overlooked.

Critical issues with our current translation and interpretation offer.

6.2 The policy aims to address five critical issues with Haringey's current translation and interpretation offer that were highlighted during early engagement on the policy.

- Without high-quality translation interpretation, language barriers can negatively impact the access, experience and outcomes of residents using our services who are not confident English speakers.
- Without effective translation, language barriers limit the ability of our communications to reach the broadest range of communities.
- The council does not have a T&I policy and so decisions about use of translation and interpretation may not be as consistent as they should be.
- These factors result in missed opportunities to meet needs and prevent escalation.
- Informal interpretation (using children, relatives and multilingual staff) is often used when inappropriate, presenting ethical, confidentiality and well-being issues.

Resident Engagement

8.1.1 To ensure the policy meets the needs of resident's, representatives from Latin America, Turkish Kurdish, and Somali communities were invited to a conversation

about the policy and to discuss their experiences of translation and interpretation in more generally.

8.1.2 The conversation focused on how members of these communities like to access and receive information and how they self-serve their translation and interpretation needs.

8.1.3 These conversations provided valuable insight into how to best reach communities with translated material to reduce language barriers proactively. Additionally, they emphasised what we already know that our language communities are not helpless and, for the most part, have strategies for accessing translation and interpretation. This learning ensures that we do not provide unnecessary or patronising support to communities and instead use the policy to help residents when self-service is not possible or inappropriate.

8.1.4 This learning from residents' engagement has been reflected in the final policy.

The change the policy will drive.

6.3 The policy will essentially codify existing practices in the council and, by doing so, will ensure that residents receive the same high-quality translation and interpretation support no matter where or how they interact with council services.

6.4 There are, however, some fundamental changes that the policy will drive:

- Make it clear that all officers have shared responsibility for considering residents' language needs, using translation and interpretation and linking residents to ESOL classes where appropriate.
- Support better decision-making around interpretation, ensuring residents get the service they need, balanced against the most effective use of resources.
- Increased officer confidence in using technology for translation and interpretation, allowing us to do more with less and more quickly.
- Increased use of data to support proactive use of translation and interpretation.
- Encourage more proactive removal of language barriers, including better use of language lines (e.g. inserts in letters that explain the letter in multiple languages), summarised documents and bringing interpreters to engagement sessions.
- Clarity on our position on where it is appropriate to use informal interpreters (children, relatives, and multilingual council officers).

6.5 While the policy may increase demand for translation and interpretation in the council, it should also help mitigate the impact this has on cost by ensuring the correct balance between service quality and effective use of resources.

6.6 We also expect that improving resident access to and experience of council services, support, and advice will enhance prevention and improve long-term outcomes. This will result in long-term savings due to better prevention leading to less escalation and a reduction in more costly interventions.

7. Contribution to the Corporate Delivery Plan 2022-2024 High level Strategic outcomes'?

7.1 The translation and interpretation links to High-level outcome 1 of the resident experience, participation and collaboration theme,

Positive resident experience - All residents, businesses and other stakeholders can easily access services designed and operated in a resident-centric way.

8. Carbon and Climate Change

8.1 This decision will have no impact on carbon usage, climate change or net zero.

9. Statutory Officers comments (Director of Finance (procurement), Head of Legal and Governance, Equalities)

9.1 Finance

9.1.1 The proposed translation and interpretation policy essentially codifies existing practice that is already going on in the council and therefore the cost of the service is expected to remain broadly in line with current levels of spend and be managed within the existing budget envelope.

9.1.2 It is possible that the introduction of a formal policy may lead to some increased demand for T&I, however aspects of the policy should help mitigate cost increases, notably that more expensive in-person interpretation should only be used when critical for service delivery, and focusing on finding and using new tech solutions for T&I.

9.2 Head of Legal & Governance

9.2.1 The Head of Legal and Governance has been consulted in the preparation of this report and comments as follows.

9.2.2 The Policy sets out the council's approach to communicating with residents who do not use spoken or written English as their main language or who have a sensory impairment such as deafness or blindness and use sign language or braille to communicate. It provides a framework for the use of translation and interpretation services across the council with a view to improving equity of access to services and documentation and proactively removing the language and communication barriers residents may experience when interacting with the council.

9.2.3 In doing so, it promotes the Council's Public Sector Equality Duty (PSED) under section 149 Equality Act 2010 as set out more fully in the Equalities section of this report below (paragraph 9.3). It assists the Council in advancing equality of opportunity between people who share protected characteristics and people who do not. Accordingly, there are no legal reasons as to why Cabinet should not approve the Recommendation in this report.

9.3 Equality

9.3.1 The council has a Public Sector Equality Duty (PSED) under the Equality Act (2010) to have due regard to the need to:

- Eliminate discrimination, harassment and victimisation and any other conduct prohibited under the Act.

- Advance equality of opportunity between people who share protected characteristics and people who do not.
- Foster good relations between people who share those characteristics and people who do not.

9.3.2 The three parts of the duty apply to the following protected characteristics: age, disability, gender reassignment, pregnancy/maternity, race, religion/faith, sex and sexual orientation. Marriage and civil partnership status applies to the first part of the duty.

9.3.3 Although it is not enforced in legislation as a protected characteristic, Haringey Council treats socioeconomic status as a local protected characteristic.

9.3.4 The decision in question is regarding the approval of the London Borough of Haringey Translation and Interpretation Policy, which provides a framework for working with residents whose main language is not English.

9.3.5 Improving equity of access and outcomes and proactively removing the barriers residents may experience when interacting with the council. High-quality translation and interpretation are critical to meeting these commitments and advancing equality of opportunity for residents who are not confident English speakers.

9.3.6 Data held by the council suggest that residents who are not confident English speakers are more likely to be vulnerable in ways that mean they will be in contact or would benefit from contacting the council, e.g. in food poverty, receiving benefits or being unable to pay a sudden bill. However, language barriers may block access to or negatively impact residents' experience of council services, leading to missed opportunities to provide support and adverse outcomes.

9.3.7 The policy aims to ensure that all residents can access council services and communications regardless of their levels of English proficiency. Data from the 2021 Census suggests that women, people over 35, disabled people, people from minority ethnic backgrounds, and those from a low socioeconomic background are overrepresented among residents who are not confident English speakers. Therefore, this policy should positively impact all those who share these protected characteristics. It will also positively advance the public sector equality duty, especially the need to advance equality of opportunity between people who share protected characteristics and people who do not.

9.3.8 For the full equalities analysis, an EqIA is attached in Appendix 2. The EqIA identified no significant negative impact, and the policy mitigates any minor negative implications that could emerge. Therefore, we do not expect any negative equality impacts from adopting this policy.

10. Use of Appendices

Appendix 1 – London Borough of Haringey Translation and Interpretation Policy

Appendix 2 – Translation and Interpretation Policy EQIA (Equality Impact Assessment)

11. **Background papers**

The following sources have been used to compile this cabinet report.

1. Census 2021 language data -

<https://www.ons.gov.uk/peoplepopulationandcommunity/culturalidentity/language/bulletins/languageenglandandwales/census2021>

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