

Equality Impact Assessment (EQIA)

The Equality Impact Assessment (EQIA) form is a template for analysing a policy or proposed decision for its potential effects on individuals with protected characteristics covered by the Equality Act 2010.

The council has a Public Sector Equality Duty 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

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.

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

1. Responsibility for the Equality Impact Assessment

Name of proposal: LBH Translation and Interretation

Policy

Service Area: Policy and Equalities

Officer Completing Assessment: Elliot Sinnhuber

Equalities Advisor: Elliot Sinnhuber

Cabinet meeting date (if applicable): 17th October 2023

Director/Assistant Director Jess Crowe - Director of Culture,

Strategy & Engagement/Claire McCarthy - AD Strategy, Comms &

Collaboration

2. Executive summary

This EQIA is for the Haringey Council Translation and Interpretation Policy, which aims to proactively remove barriers and support all residents who do not use English as their main language, particularly those who are not confident English speakers, including those with a sensory impairment who use sign or braille languages.



The aims of the policy are:

- To remove barriers and ensure equitable access to all council services and information.
- To guide council officers and promote consistent decision-making, ensuring a quality service is provided across the council.
- To highlight good practise and set minimum expectations when communicating with residents who are not confident at communicating in English.
- To emphasise the importance of ethical, wellbeing and confidentiality considerations when using informal interpreters and only using them where appropriate.

The changes we expect to see from the policy include:

- Make it clear that all officers have responsibility for considering residents' language needs and the using translation and interpretation.
- Support better decision-making around interpretation, ensuring residents get the service they need, balanced against the most effective use of resources.
- Offer confidence in the increased use of technology for translation and interpretation, allowing us to do more with less and more quickly
- Encourage more proactive removal of language barriers, including better use of language lines, summarised documents and bringing interpreters to engagement sessions.
- Clarity on our position on the use of informal interpreters (children, relatives, and multilingual council officers).

The EQIA has identified that the policy will positively impact those who share the protected characteristics. It will notably support older people, younger people, disabled people, females, people from smaller ethnic minority groups and people from a lower socioeconomic background.

This EQIA has identified no significant adverse impacts, and the policy considers and mitigates any minor adverse effects identified.

3. Consultation and engagement

3a. How will consultation and/or engagement inform your assessment of the impact of the proposal on protected groups of residents, service users and/or staff? Detail how your approach will facilitate the inclusion of protected groups likely to be impacted by the decision.

The policy has been developed in conversation with over 30 staff members from various directorates.

Representatives from the Turkish-Kurdish, Somali and Latin American language networks were consulted on the final policy and their feedback and insights are



reflected in the final draft. Conversations will seek to understand the policy's impact on resident experience and equalities.

3b. Outline the key findings of your consultation / engagement activities once completed, particularly in terms of how this relates to groups that share the protected characteristics.

The consultation provided beneficial insight into the policy. Those consulted approved of the policy and felt it would positively impact those who share the protected characteristics. No adverse impacts were highlighted.

This learning from residents' engagement has been reflected in the final policy. 4.

Data and Impact Analysis

Note: officers may want to complement their analysis with data from the State of the Borough and ward profiles, found here: https://www.haringey.gov.uk/local-democracy/about-council/state-of-the-borough.

Please consider how the proposed change will affect people with protected characteristics.

4a. Age

Data

Borough Profile¹

54,422: 0-17 (21%) 71,660: 18-34 (27%) 63,930: 35-49 (24%) 46,516: 50-64 (18%) 27,706: 65+ (10%)

Target Population Profile

Residents whose main language is not English and who cannot speak English confidently (Cannot speak it well or at all):

3-15: 1083 (5.8%) 16-24: 763 (4.1%) 25-34: 2390 (12.8%) 35-49: 5757 (30.7%) 50-64: 5770 (30.8%) 65+: 2926 (15.8%)

What data sources will you use to inform your assessment of the impact of the proposal on people under this protected characteristic?

¹ Census 2021 - <u>Population and household estimates, England and Wales - Office for National Statistics</u> (ons.gov.uk)



The data of the target population above is from the 2021 census and shows the total number of Haringey residents whose main language is not English and cannot speak English confidently (well or at all) by age band.

The available data shows that residents between the ages of 35-64 have significantly lower levels of English proficiency and are overrepresented in the target population, making up 60% of all Haringey residents whose main language isn't English and who can't speak it well or at all.

Potential Impacts

 Consider whether the proposed policy/decision will have positive, neutral, or negative impacts (including but not limited to health impacts).

The policy should positively impact those who share this protected characteristic. By taking an equitable approach to the provision of T&I, the policy should ensure the removal of barriers and better access to services and council comms for the target group, particularly older people.

Older people may be more likely to experience digital exclusion, and the policy strongly advocates using technology to improve our capacity for translation and interpretation. But the use of technology is on the officer not the resident, and every T&I service that has a digital solution also has a non-digital one preventing anyone from being excluded digitally from T&I provision.

From conversations with officers, it is also known that young children are sometimes being used as interpreters in inappropriate situations that may have a negative impact on their wellbeing. The policy ensures that children are only used as interpreters in emergencies and should positively impact the well-being of some young people.

4b. Disability

Data

Borough Profile

- Disabled under Equality Act 13.7%²
 - Day to day activities limited a lot 6.1%
 - Day to day activities limited a little 7.5%
- 7.5% of residents people diagnosed with depression³
- 1.7% of residents diagnosed with a severe mental illness⁴
- 0.4% of people in Haringey have a learning disability⁵

² Census 2021 - Disability, England and Wales - Office for National Statistics (ons.gov.uk)

³ NHS Quality Outcomes Framework - <u>Prevalence of diagnosed depression among GP registered populatoin</u> age 18+

⁴ NHS Quality Outcomes Framework - <u>Prevalence of diagnosed mental health diagnosis among GP registered</u> population age 18+

⁵ PHE Learning disability profiles - https://fingertips.phe.org.uk/learning-disabilities#page/0/gid/1938132702/pat/6/par/E12000007/ati/102/are/E09000014



Target Population Profile

Residents whose main language is not English and who cannot speak English confidently (Cannot speak it well or at all):

- Not disabled under the Equality Act: No long-term physical or mental health conditions 14,180 (75.7%)
- Not disabled under the Equality Act: Has long-term physical or mental health condition but day-to-day activities are not limited 419 (2.24%)
- Disabled under the Equality Act: Day-to-day activities limited a little 1454 (7.76%)
- Disabled under the Equality Act: Day-to-day activities limited a lot 2678 (14.0%)

What data sources will you use to inform your assessment of the impact of the proposal on people under this protected characteristic?

The data of the target population above is from the 2021 census and shows the total number of Haringey residents whose main language is not English and cannot speak English confidently (well or at all) by disability.

Available data shows that residents who do not use English as their main language and who are not confident speakers of English are significantly more likely to be disabled under the Equality Act than the population of Haringey as a whole (21.76% vs. 13.7%). This is particularly noticeable with the most severely disabled, whose day-to-day activity is limited a lot, where 14% of residents with low English proficiency fall into this category compared to 6.1% in the general population.

Potential Impacts

• Consider whether the proposed policy/decision will have positive, neutral, or negative impacts (including but not limited to health impacts).

The policy is likely to have a positive impact on those who share this protected characteristic. It will ensure that those who are not confident English speakers, who are overrepresented among disabled people, can access services, support and comms effectively by receiving the appropriate level of T&I support.

Disabled people may experience a range of barriers to accessing services and support, of which language is one. Other than spoken language, the policy also accounts for a range of communication needs that may be required by a disabled person, including braille, sign language, large format and audio translations.

Disabled people are known to be more at risk of a range of things for which they might require support from the council, such as food poverty or financial hardship. Yet, those who do not speak English may find it harder to access these services.



The policy seeks to proactively address these barriers experienced by residents who do not use English as their main language, so we hope to see an improvement in levels of prevention and better long-term outcomes in a wide range of areas.

4c. Gender Reassignment

Data

Borough Profile⁶

- Gender Identity different from sex registered at birth but no specific identity given – 0.5%
- Trans woman 0.1%
- Trans man 0.1%

There is no available data on gender reassignment and English proficiency from the 2021 census or any other source. This is due to data protection, where the population group would be small enough to make it possible to identify individual people.

There is no known reason why people with this protected characteristic would be overrepresented in the target population or that this protected characteristic would make them more likely to have lower levels of English proficiency.

Potential Impacts

 Consider whether the proposed policy/decision will have positive, neutral, or negative impacts (including but not limited to health impacts).

The policy will likely have a neutral impact on residents who share this protected characteristic.

4d. Marriage and Civil Partnership

Data

Borough Profile 7

Divorced or formerly in a same-sex civil partnership which is now legally dissolved: (9.9%)

Married or registered civil partnership: (35.8%)

Separated (but still legally married or still legally in a same-sex civil partnership): (2.9%%)

Single (never married or never registered a same-sex civil partnership): (45.3%) Widowed or surviving partner from a same-sex civil partnership: (6.1%)

⁶ Census 2021 - Gender identity, England and Wales - Office for National Statistics (ons.gov.uk)

⁷ Census 2021 - <u>Marriage and civil partnership status in England and Wales - Office for National Statistics</u> (ons.gov.uk)



This protected characteristic only applies to certain specific circumstances (such as employment) it is therefore not relevant to this policy change.

There is no avaliable data relating to marriage and English proficiency.

There is no known reason why people with this protected characteristic would be overrepresented in the target population or that this protected characteristic would make them more likely to have lower levels of English proficiency.

Potential Impacts

 Consider whether the proposed policy/decision will have positive, neutral, or negative impacts (including but not limited to health impacts).

The policy will likely have a neutral impact on residents who share this protected characteristic.

4e. Pregnancy and Maternity

Data

Borough Profile 8

Live Births in Haringey 2021: 3,376

There is no avaliable data relating to pregnancy/maternity and English proficiency. There is no known reason why people with this protected characteristic would be overrepresented in the target population or that this protected characteristic would make them more likely to have lower levels of English proficiency.

Potential Impacts

• Consider whether the proposed policy/decision will have positive, neutral, or negative impacts (including but not limited to health impacts).

The policy will likely have a neutral impact on residents who share this protected characteristic.

4f. Race

In the Equality Act 2010, race can mean ethnic or national origins, which may or may not be the same as a person's current nationality.⁹

Data

Borough Profile 10

Arab: 1.0%

⁸ Births by Borough (ONS)

⁹ Race discrimination | Equality and Human Rights Commission (equalityhumanrights.com)

¹⁰ Census 2021 - Ethnic group, England and Wales - Office for National Statistics (ons.gov.uk)



Any other ethnic group: 8.7%

Asian: **8.7%**

Bangladeshi: 1.8% Chinese: 1.5% Indian: 2.2% Pakistani: 0.8% Other Asian: 2.4%

Black: 17.6%
African: 9.4%
Caribbean: 6.2%
Other Black: 2.0%

Mixed: **7.0%**

White and Asian: 1.5%

White and Black African: 1.0% White and Black Caribbean: 2.0%

Other Mixed: 2.5%

White: 57.0% in total

English/Welsh/Scottish/Norther Irish/British: 31.9%

Irish: 2.2%

Gypsy or Irish Traveller: 0.1%

Roma: 0.8%

Other White: 22.1%

Target Population Profile

Residents whose main language is not English and who cannot speak English confidently (Cannot speak it well or at all):

Arab: 197 (1.1%)

Any other ethnic group: 4,978 (26.6%)

Asian: 2,261 (12.1%)
Bangladeshi: 549 (2.9%)
Chinese: 793 (4.2%)
Indian: 187 (1.0%)
Pakistani: 99 (0.5%)

Other Asian: 633 (3.4%)

Black: 1,612 (8.6%) African: 1,111 (5.9%) Caribbean: 443 (2.4%)

Other Black: 58 (0.3%)



Mixed: 1,075 (5.7%)

White and Asian: 81 (0.4%)

White and Black African: 136 (0.7%) White and Black Caribbean: 466 (2.5%)

Other Mixed: 392 (2.1%)

White: 8,602 45.9

English/Welsh/Scottish/Norther Irish/British: 1,079 (5.8%)

Irish: 13 (0.1%)

Gypsy or Irish Traveller: 39 (0.2%)

Roma: 319 (1.7%)

Other White: 7152 (38.2%)

The data of the target population above is from the 2021 census and shows the total number of Haringey residents whose main language is not English and cannot.

The data shows that in most cases, the ethnicity of residents it not a significant indicator for level of English proficiency. However, there are a few significant outliers. Residents in the Other White and Any Other Ethnic Group are significantly overrepresented among residents with low levels of English proficiency. 8.7% of Haringey residents are part of Any Other Ethnic Group. Yet, they make up 26.6% of residents who are not confident English speakers. Other White residents comprise 22.1% of Haringey's population, but 38.2% of residents who are not confident English speakers.

Potential Impacts

 Consider whether the proposed policy/decision will have positive, neutral, or negative impacts (including but not limited to health impacts).

The policy will positively impact those who share this protected characteristic, particularly the smaller ethnic groups that make up the Other White and Any Other Ethnic Group categories. The policy will ensure that these groups can access council services, advice and support effectively and to the same standard as those who speak English. This will support better prevention and long-term outcomes for residents.

4g. Religion or belief

Data

Borough Profile 11

Christian: 39%

¹¹ Census 2021 - Religion, England and Wales - Office for National Statistics (ons.gov.uk)



Buddhist: 0.9% Hindu:1.3% Jewish: 3.6% Muslim: 12.6% No religion: 31.6%

Other religion: 2.3%

Religion not stated: 8.0%

Sikh: 0.3%

Target Population Profile

Residents whose main language is not English and who cannot speak English confidently (Cannot speak it well or at all):

No religion 1929 (10.3%) Buddhist 385 (2.1%) Christian 8020 (42.9%) Hindu 158 (0.8%) Jewish 271 (1.4%) Muslim 5162 (27.6%) Sikh 27 (0.1%) Other religion 1499 (8.0%) Not answered 1265 (6.8%)

The data of the target population above is from the 2021 census and shows the total number of Haringey residents whose main language is not English and cannot speak English confidently (well or at all) by religion.

The ratio of religious beliefs among residents whose main language is not English and who are not confident English speakers broadly matches that of the borough profile. This is except for followers of the Muslim faith and "other religions", who are overrepresented and more than twice as likely to be less confident at speaking English than other religions and the borough profile.

Potential Impacts

• Consider whether the proposed policy/decision will have positive, neutral, or negative impacts (including but not limited to health impacts).

The policy should positively impact those who share this protected characteristic and are not confident English speakers, particularly helping to advance equality and equity for Muslims and followers of smaller religious groups who, from our data, are less likely to be confident English speakers. The policy will ensure that these groups can access council services, advice and support effectively and to the same standard as those who speak English. This will hopefully support better prevention and long-term outcomes for residents.



Certain parts of the policy might conflict with residents' religious beliefs, such as the policy's emphasis on using technology. The policy accounts for this to ensure these needs are respected. This includes every digital solution having a non-digital option and focusing on resident choice where possible.

4h. Sex

Data

Borough profile 12

Females: (51.8%) Males: (48.2%)

Target Population Profile

Residents whose main language is not English and who cannot speak English confidently (Cannot speak it well or at all):

Females: 10,810 (57.7%) Males: 7,915 (42.3%)

The data of the target population above is from the 2021 census and shows the total number of Haringey residents whose main language is not English and cannot speak English confidently (well or at all) by Sex.

Women are significantly overrepresented among residents whose primary language is not English and who are not confident English speakers. Women make up 15.4% more of this than men , but there are only 3.6% more women than men in the borough.

Potential Impacts

 Consider whether the proposed policy/decision will have positive, neutral, or negative impacts (including but not limited to health impacts).

This policy will likely positively impact those who share this protected characteristic, particularly females, by ensuring better access to council services, advice and comms. This will hopefully lead to better preventative services and improved long-term outcomes.

There are known inequalities where victims of domestic abuse, who are overwhelmingly women, who don't speak English have struggled to access support because their perpetrator has interpreted for them. The policy takes a strong position on this. It prevents informal interpreters from being used when there could be a conflict of interest.

4i. Sexual Orientation

¹² Census 2021 - Gender identity: age and sex, England and Wales - Office for National Statistics (ons.gov.uk)



Data

Borough profile 13

• Straight or heterosexual: 83.4%

• Gay or Lesbian: 2.7%

• Bisexual: 2.1%

All other sexual orientations: 0.8%

Not answered: 11.0%

There is no data on sexual orientation and English proficiency from the 2021 census or any other source. This is due to data protection, where the population group would be small enough to make it possible to identify individual people.

There is no known reason why people this protected characteristic would be overrepresented in the target population or that this protected characteristic would make more likely to have lower levels of English proficiency.

Potential Impacts

 Consider whether the proposed policy/decision will have positive, neutral, or negative impacts (including but not limited to health impacts).

The policy will likely have a neutral impact on residents who share this protected characteristic.

4j. Socioeconomic Status

Data

Borough profile

Income

- 6.9% of the population of Haringey were claiming unemployment benefit as of April 2023¹⁴
- 19.6% of residents were claiming Universal Credit as of March 2023¹⁵
- 29.3% of jobs in Haringey are paid below the London Living Wage¹⁶

¹³ Census 2021 - Sexual orientation, England and Wales - Office for National Statistics (ons.gov.uk)

¹⁴ ONS - ONS Claimant Count

¹⁵ DWP, StatXplore - <u>Universal Credit statistics</u>, 29 April 2013 to 9 March 2023 - GOV.UK (www.gov.uk)

¹⁶ ONS - Annual Survey of Hours and Earnings (ASHE) - Estimates of the number and proportion of employee jobs with hourly pay below the living wage, by work geography, local authority and parliamentary constituency, UK, April 2017 and April 2018 - Office for National Statistics



Educational Attainment

- Haringey ranks 25th out of 32 in London for GCSE attainment (% of pupils achieving strong 9-5 pass in English and Maths)¹⁷
- 3.7% of Haringey's working age population had no qualifications as of 2021¹⁸
- 5.0% were qualified to level one only 19

Area Deprivation

Haringey is the 4th most deprived in London as measured by the IMD score 2019. The most deprived LSOAs (Lower Super Output Areas, or small neighbourhood areas) are more heavily concentrated in the east of the borough, where more than half of the LSOAs fall into the 20% most deprived in the country.²⁰

Target Population Profile

Indicators of Deprivation

Household Language	Households deprived in at least one dimension		
	% of	Number of	Likelihood to be
	Households	Households	deprived
			compared to the
			average
All adults in household have	50.7	35,597	x0.89
English as their main			
language			
At least one but not all	64.7	8,680	x1.14
adults have English as their			
main language			
No adults in households,	73.8	2,625	x1.30
but at least one person			
aged 3 to 15 years, had			
English as a main language			
No People in household	70.9	12,668	x1.25
have English as a main			
Language			
Grand Total	56.7	59,570	N/A

Employment

Data from the 2011 Census study also showed the significant impact that English language proficiency has on financial security. In terms of employment fewer than half (48%) of those considered non-proficient in English were employed, compared with 72% of the working age population. This difference was particularly severe with

¹⁷ DfE - GCSE attainment and progress 8 scores

¹⁸ LG Inform - Data and reports | LG Inform (local.gov.uk)

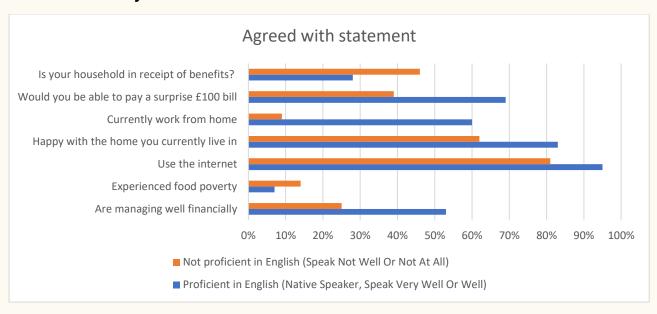
¹⁹ LG Inform - Data and reports | LG Inform (local.gov.uk)

²⁰ IMD 2019 - English indices of deprivation 2019 - GOV.UK (www.gov.uk)



females, where around a third (34%) of those non-proficient in English were in employment compared with 58% of women who were proficient in English.

Residents Survey



Avaliable data is from the 2021 Census and Haringey resident survey which allow us to compare English as a main language to a variety of Socioeconomic indicators.

Data from the 2021 Census shows a clear link between English proficiency and deprivation. 50% of households where all adults speak English have at least one deprivation indicator. This is 72% for households where no adults speak English.

Data from the 2021 Haringey Residents Survey show that residents proficient in English are six times more likely to be able to work from home (working from home can be a proxy for higher-paid jobs). Additionally, those who are not proficient in English are more than twice as likely to be struggling financially than those who are, and those who are not proficient in English are nearly twice as likely to receive benefits, experience food poverty and be unable to pay a surprise bill.

Potential Impacts

 Consider whether the proposed policy/decision will have positive, neutral, or negative impacts (including but not limited to health impacts).

This policy should positively impact residents from a low socioeconomic background. As the data suggests, those from a low socioeconomic background are more likely to be vulnerable and, therefore, be in a position where they would either already be interacting with the council or benefit from interacting with the council for advice and support. The policy will ensure that this group can access council services, advice and support effectively and to the same standard as those who speak English. This will hopefully support better prevention and long-term outcomes for residents.



5. Key Impacts Summary

5a. Outline the key findings of your data analysis.

The policy will positively impact equalities, particularly those who share the protected characteristics of age, sex, disability, race, religion and socioeconomic status. The focus on technology risks having a negative impact on certain people who, for various reasons, cannot use technology. This risk, however, will be entirely mitigated by:

- A non-digital solution exists for every option where a digital solution is the default approach.
- A core principle of the policy is resident choice and ensuring officers consider and respect the individual needs of residents when providing translation and interpretation.

5b. Intersectionality

Data from the 2021 census has shown us that females over the age of 35 are by far the most likely cohort to have low levels of English proficiency. This policy should have a positive impact on this cohort in particular.

5c. Data Gaps

Based on your data are there any relevant groups who have not yet been consulted or engaged? Please explain how you will address this.

N/A

6. Overall impact of the policy for the Public Sector Equality Duty

The policy should have a positive impact on the PSED. The proposal will help to advance equality of opportunity between groups who share a relevant protected characteristic and those who do not. This is because the policy will ensure that residents who are not confident English speakers and who are therefore more likely to be older, females, disabled, from a minority ethnic group and from a low socioeconomic background can access council services, advice and support effectively and to the same standard as those who speak English.

7. Amendments and mitigations

7a. What changes, if any, do you plan to make to your proposal because of the Equality Impact Assessment?

Further information on responding to identified impacts is contained within accompanying EQIA guidance.

Please delete Y/N as applicable



No major change to the proposal: the EQIA demonstrates the proposal is robust and there is no potential for discrimination or adverse impact. All opportunities to promote equality have been taken. **Yes**

Adjust the proposal: the EQIA identifies potential problems or missed opportunities. Adjust the proposal to remove barriers or better promote equality. Clearly <u>set out below</u> the key adjustments you plan to make to the policy. If there are any adverse impacts you cannot mitigate, please provide a compelling reason below **No**

Stop and remove the proposal: the proposal shows actual or potential avoidable adverse impacts on different protected characteristics. The decision maker must not make this decision. **No**

7b. What specific actions do you plan to take to remove or mitigate any actual or potential negative impact and to further the aims of the Equality Duty?

N/A

7. Ongoing monitoring

Summarise the measures you intend to put in place to monitor the equalities impact of the proposal as it is implemented.

- Who will be responsible for the monitoring?
- What the type of data needed is and how often it will be analysed.
- When the policy will be reviewed and what evidence could trigger an early revision
- How to continue to involve relevant groups and communities in the implementation and monitoring of the policy?

The policy will guide the tendering process for a newly commissioned T&I service. The provider, Haringey Council, will be expected to uphold the PSED.

The intention is to monitor the policy to ensure it has the desired impact. This will involve conversations and feedback from council officers, and residents and analysis of data from the council commissioned T&I service. The same monitoring will also be used to identify any emerging equality implications.

8. Authorisation

EQIA approved by (Assistant Director/ Director)

Claire McCarthy

Date 28/09/2023

9. Publication



Please ensure the completed EQIA is published in accordance with the Council's policy.

Please contact the Policy & Strategy Team for any feedback on the EQIA process.