



TRANSLATION POLICY

Introduction

Brent Housing Partnership (BHP) is committed to providing information on services to all its customers including those whose first language is not English, have a visual impairment, disability and language or literacy barriers.

BHP aims to provide all information in a form appropriate to the needs of our service users in plain English and through written and oral translations into other languages, braille and large print. Customers with a hearing or speech impairment can communicate with BHP staff by telephone through NGT Relay or in person at our offices using an induction loop.

Scope and definitions

2.1 This policy is aimed at all residents who need access to BHP's 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 'Interpreting' and 'translating' refer to changing from one language to another. 'Interpreting' is usually about the spoken word, and 'translation' is usually about a written change of language.

2.3 The term 'main community languages' is used in the policy and procedure to mean those languages identified by BHP as the ones most frequently used or requested by residents.

Legal and regulatory framework

3.1 Key legislation relevant to this policy includes the Equalities Act 2010 introduced on 8 April 2010 which introduces two 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 heterosexual people and people who have changed their sex or in the process of doing so.

Equality and Diversity

4.1 This Translation Policy is part of BHP's overall Equality and Diversity strategy.

Based on an equality impact assessment, organisations 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

Health and Safety

When arranging face to face interpreters (e.g. for home appointments) the same personal safety considerations as used by BHP staff should be applied.

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 proactive implementation of this policy and procedure at the point of contact with residents.

6.3 The Communications Team is responsible for arranging the translation of corporate information and monitoring the associated budget.

6.4 The Communications Team is responsible for arranging for the translated information to be placed on the internet.

6.5 The Communications Team are responsible for the language accessibility of the BHP website.

Identifying individual needs

7.1 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 (e.g. of an individual letter or document) – this will be subject to a cost assessment. 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.

7.2 We will make every effort to provide all customers with information in a form that is accessible.

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

Interpreting services

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

8.2 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, antisocial behaviour or harassment.

Staff as interpreters

9.1 Staff with non-English language skills will be encouraged to use them to provide a responsive service to residents.

9.2 A database of staff language spoken and written skills will be held centrally by the Communications Team and made available to all staff via the intranet.

9.3 Officers who speak more than one language can also be contacted to check official translations to be printed in brochures are an accurate reflection of the language.

Translation Services

10.1 BHP will use the services of Brent Council's language shop for both written translations and interpreters.

10.2 Where customer request written information translated into a non-English language, BHP 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.

10.2 If the customer's preference is written information, BHP's aim 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.

10.3 Local requests for short written translations (e.g. letters) will be provided within 5 working days, with longer BHP 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.

10.4 BHP 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. BHP will aim to provide such services, subject to cost assessment.

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

Publicity

11.1 We will publicise the translation/interpreting service in the external publications e.g. newsletters and on the BHP website

11.2 Corporate leaflets/publications will contain short translation statement in the main community languages indicating who to contact for a translation/interpreting request.

The translation statement must:

- Tell the target audience what the publication is about. For example ‘this brochure contains information on your right to buy your home.’
- It must then offer to assist with understanding the document. For example: ““This is Brent Housing Partnership’s Newsletter, Partnership News. Please contact Communications on 020 8937 2363 if you need help to understand this document.”

11.3 Website:

BHP aims that all customers have access to the information provided on the website and it is available in a comprehensive range of languages and formats appropriate to our service users.

The website will provide links to translated documents with clear signposting from the front page and will utilise the latest technology to ensure that website content is fully accessible to all customers, e.g. links to a web page translator and speech enabled software. Where possible, BHP will look to share costs with other landlords by using shared versions of translated and large print documents through links to appropriate websites.

Languages

12.1 BHP analysed the main non English ‘community languages’ identified by residents as their preferred languages. At the time of printing these languages are:

- Farsi

- Gujarati
- Arabic
- Somali
- Tamil
- Urdu
- Polish
- Portuguese
- Romanian

Budget implications

13.1 A centralised translation budget will be held by the Communications Team for translating corporate documents such as newsletters, annual reports, leaflets etc. Other translations costs for team specific communications will come under the relevant departments' budget.

13.2 It is important that all managers consider budget implications of offering translations and interpretations. It is difficult to estimate how many residents will take advantage of the service to translate a document. The exact cost of translating a document varies depending on length of document.

Plain English

All documents, brochures and handbooks, produced by BHP for distribution to 50 or more residents, should be reviewed by the Communications Team or a senior manager. It is the aim of BHP that all printed literature is written in plain English and be jargon free with any technical or specialist information clearly explained.