Equality Impact Assessment for strategies, policies, plans & needs assessment frameworks

Name of strategy, policy, plan or needs assessment framework
Interpretation & Translation Policy

Date of assessment:

Start date	Completion date
7th August 2012	8th October 2012

Lead officer and Contact details	Sheena Raval, Partnership & Strategy Officer Delivery, Communications and Political Governance Division Internal: 296487 External: 0116 2526487 Sheena.Raval@leicester.gov.uk
List of other(s) involved	Irene Kszyk, Corporate Equalities Lead Internal: 296303 External: 0116 2526303 Irene.Kszyk@leicester.gov.uk

Step 1   Strategy/policy/plan/needs assessment framework context

Question: 1

1a. What does the strategy/policy/plan/needs assessment framework cover? What are its aims and objectives?
The policy aims are: • To inform residents and customers about how the Council will ensure that information is accessible to them • To guide Council staff on what they should do to ensure that their service information is accessible. • To ensure consistency across the Council on the provision of accessible information Through this policy, the Council will seek to ensure that information is accessible through interpretation and translation to those who most need it.
1b. Who does the strategy/policy/plan/needs assessment framework affect? How?

The policy affects service users who have difficulties in accessing Council information and services. Where the service user will be put at significant disadvantage without a specific piece of information, that information will be provided in a suitable format for them through interpretation or translation.

The policy is for residents/Council customers who have difficulty understanding written or spoken English.

The policy aims to guide Council staff on what they should do to ensure their service information is accessible and seeks to ensure consistency across the Council on the provision of accessible information.

1c. How well does the strategy/policy/plan/needs assessment framework take into account the changing demographic profile of the city and the needs of new/emerging communities?

The policy reflects the on-going demographical changes to the city.

There are more than 70 languages or dialects used across the city, including communication such as British Sign Language (BSL). The number of languages continues to increase as the city's population becomes more diverse, including an increasing number of people with learning disabilities who may require easy read information.

1d. What equality issues does the strategy/policy/plan/needs assessment framework need to address based on existing research or other service information available for the intended target audience? Outline the issues to consider for each of the protected characteristics below (where relevant for the target audience).

Age	Older service users/residents whose first language is not English may find it difficult to learn English
	Older service users/residents who because of the ageing process, may need information in an alternative formats, i.e. large font.
Disability	Individuals may experience difficulties communicating and engaging with the council due to physical/sensory disabilities or learning disabilities
Gender reassignment	Not relevant
Pregnancy and maternity	Not relevant
Race	Individuals whose first language is not English may have difficulties accessing information (verbal or written format)
Religion or belief	See 'Race' above.
Sex (gender)	Not relevant
Sexual orientation	Not relevant

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Step 2   Consultation

Question: 2

2a. What consultation has taken place on the proposed strategy/policy/plan/needs assessment framework? When, where and who with?
The policy takes into account multi agency views that the Council endorsed from the previous multi agency Language Policy EIA is based on information provided by the following key stakeholders, who engage directly with target groups: Anwar Hoque, Head of Community Languages, July 2012 Yasmin Surti, lead Commissioner (Learning Disabilities and Mental Health), July 2012 Caroline Ryan, Lead Commissioner (Supported/Independent Living), August 2012
2b. What potential impacts did consultation stakeholders identify?
Multi Agency Group highlighted the importance of ensuring that people, who were disadvantaged because they had difficulties in accessing Council information, were provided with information in the appropriate format. Anwar Hoque – Council staff lack awareness of customer linguistic needs for disadvantage groups and are not utilising the services of CLS. Yasmin Surti – Easy Read is used across the Council without consistency. Caroline Ryan – Strategy for Sensory Disability. People with visual impairment have access to braille and audio information and people with hearing impairment have access to easy read and visual aids e.g. videos with sign language.
2c. What positive impacts were identified? For people with which protected characteristics?
The policy helps ensure that people understand the information that they need to access and use Council services, make informed decisions and take advantage of life opportunities in the city.
2d. What negative impacts were identified? For people with which protected characteristics?
Currently there is inconsistent practice across the Council about what and how we provide interpretation and translation services. Anwar Hoque –Despite the linguistic needs of customers with protected characteristics, departments are reluctant to use the services of CLS due to budgetary constraints. Yasmin Surti – No identified resources to produce easy read, audio, braille and sign language dvd's/video's

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Caroline Ryan - No identified resources to produce easy read, audio, braille and sign language dove's/video's

2e. Did stakeholders indicate how positive impacts could be further promoted? How?
Anwar Hoque – Appropriate use of the CLS to minimise linguistic barriers between the council and its customers/residents.   Yasmin Surti – Through delivering information in a range of formats including face-to-face engagement via community groups in relevant spoken language and the use of multimedia applications.   Caroline Ryan –As above.

2f. Did stakeholders indicate how negative impacts could be reduced or removed? How?
Anwar Hoque – Appropriate use of the CLS to minimise linguistic barriers between the council and its customers/residents.   Yasmin Surti – Resourcing and development of appropriate media for those with visual impairment e.g. braille and audio information, people with hearing impairment e.g. access to easy read and visual aids e.g. videos with sign language.   Caroline Ryan – As above.

2g. What equality outcomes have potential service users indicated they would like achieved?
Not available

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Step 3 Proposed strategy/policy/plan/needs assessment framework

Question 3

	No impact	Positive impact	Negative impact	Impact not known
Age		X	X	
Disability		X	X	
Gender reassignment	-			
Pregnancy and maternity	-			
Race		X	X	
Religion or belief	-			

	No impact	Positive impact	Negative impact	Impact not known
Sex (gender)	-			
Sexual orientation	-			

Question 4

For those likely to receive a positive impact, describe the likely positive impact for each group sharing a protected characteristic. How many people are likely to be affected?
 •   Consistency of approach by the Council •   Accessible Council services and information about those services for those who most need it •   Policy clarifies how individual needs are assessed The above points apply equally to the following protected characteristics: age, disability and race.

Question 5

6a. For those likely to receive a negative impact, describe the likely negative impact for each group sharing a protected characteristic. How many people are likely to be affected?
Customer expectations may not be met as in the past Council services were able to make their own decisions around providing interpretation and translation services, based on customer request – now it is based on criteria as set out in the policy.
6b. How can these negative impacts be reduced or removed?
The policy clearly sets out the Council's provision for interpretation and translation, thereby managing people's expectations of what is on offer.

Question 7

What data/information/analysis have you used to inform your equality impact findings?
Mori Survey 2005 – *7% of the population had difficulty reading or understanding English* Commission on Integration and Cohesion, *Our Shared Future, 2007* Department for Communities and Local Government, Guidance for Local Authorities on Translation of Publications, 2007

New Communities in Leicester, Leicester City Council, April 2009

Employment Statutory Code of Practice, Equality & Human Rights Commission, 2010

Making written information easier to understand for people with learning disabilities, Department of Health, 2010

The Diversity of Leicester: Survey of Key Facts, Leicester City Council, 2011

Languages in Leicester City Council Schools, Leicester City Council, 2011

The Community Language Services, Leicester City Council - most requested languages for interpretation and translation in Leicester, 2012

Question 8

8a. Does the proposed strategy/policy/plan/needs assessment framework include any equality outcomes?
No
8b. What indicators will measure the successful delivery/achievement of these equality outcomes?
N/A

Date completed 8th October 2012

This EIA has been completed by:

Lead officer (signature)	Sheena Raval
Date	08/10/12

The EIA has been signed off by the Equality Officer:

Equality officer (signature)	Irene Kszyk
Date	08/10/12

This EIA has been signed off by the Division Director:

Divisional Director (signature)	Miranda Cannon
Date	08/10/12

EIA Action Plan

Please list all the equality objectives, actions and targets that result from the Equality Impact Assessment. These should be included in the relevant service plan for performance management purposes.

Equality Objective	Action required	Target	Officer responsible	By when?
Example: To know equality profile of all service users.	Example: collect monitoring data on disabled users (currently not being provided)	Example: To have data for first performance review	Example: Joe Smith	Example: Start collection of data in April 10
Raise awareness of the diversity and demographics of Leicester, in particular highlighting percentage of residents whose first language is not English and those with a disability.	• Accessible information on the city's diversity and demographics • Publicise via managers, departmental newsletters and intranet. • Include as part of staff induction	To keep up to date with changing trends Staff are aware of the diversity and demographics of the city.	Equalities, Research & Intelligence	Ongoing
Ensure all Council employees have access to and are aware of the policy	• Publicise via managers, departmental newsletters and intranet. • Ensure hard	Ensure all front line staff are aware of the policy and follow the policy	Divisional Directors via Operational Board	Ongoing

	copies/briefings are provided for employees without access to the intranet. • Include section within employee staff handbook • Include as part of staff induction. • Provide key point of contact for questions or clarifications.			
Enable services to understand the level of need by monitoring requests	Services to collate information about formats requested and provided.	Up to date information on demand and Council's response to that demand	The Community Language Services	Quarterly Reports Ongoing