



## Core Business

### Translations, Transcriptions and Interpreting

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<b>Scope:</b>	This policy applies to Circle Anglia: AMS/Mears, Circle 33 Housing Trust, Commercial Services Circle Anglia, EPIC Trust, Invicta Telecare, Merton Priory Homes, Mercian Housing Association, Mole Valley Housing Association, Old Ford Housing Association, Roddons Housing Association, Russet Homes, South Anglia Housing and Wherry Housing Association
<b>Effective Date:</b>	March 2010
<b>Review Date:</b>	March 2011
<b>Signed Off :</b>	Group Policy Forum, 25 <sup>th</sup> February 2010
<b>Author:</b>	Amy Carter, Group Policy
<b>Policy Owned by:</b>	Group Policy
<b>National Standards/Regulation:</b>	Tenant Involvement and Empowerment Standard Value for Money Standard QAF C1.4 Fair Access, Diversity, Inclusion and Minority Needs
<b>Legislation:</b>	n/a

# Translations, Transcriptions and Interpreting

## 1 Scope

- 1.1 This policy applies to all Group members.
- 1.2 It sets out our commitment to providing appropriate translations, transcriptions and interpreting services for customers including:
  - residents of all tenures
  - service users
  - any person who is in the process of being referred to us for housing, or any of the services that we provide.
- 1.3 We have a separate [Equality and Diversity policy](#) which sets out our commitment to welcoming and valuing diversity, promoting equality of opportunity and fairness and tackling discrimination.

**Translation** means converting a written communication from one language into another, keeping the original meaning.

**Transcription** is the creation of an alternative format of a document such as large print, audio, Braille or Easy Read.

**Interpreting** is where one language is verbally translated into another by a person who knows both languages. Interpreting also includes non-verbal communication such as British Sign Language.

## 2 Policy Statement

- 2.1 Circle Anglia works to enhance the Life Chances of customers **by** providing safe, secure and affordable places to live, developing quality services that meet customers' needs and engaging with customers to build inclusive and sustainable communities.
- 2.2 Circle Anglia will ensure that our customers have access to information about their rights and responsibilities, and the opportunities and services which are available. We will provide translation, transcription and interpreting services that are relevant to customers needs.
- 2.3 At Circle Anglia, we aim to achieve best value for money by offering quality services to our customers in the most cost-effective manner possible.

## 3 Policy

- 3.1 Circle Anglia's translation, transcription and interpreting services are provided by:
  - **thebigword** for document translation and transcription, and face-to-face interpreting.
  - **Languageline** for over-the-phone interpreting.

By using Group contracts we ensure that we offer consistent services for customers across the areas in which we work and achieve better value for money.

- 3.2 For Group partners who have long-standing local translations arrangements in place that demonstrate best value for money and are locally embedded, including those with the local authority or a voluntary organisation, there is flexibility within the policy for those arrangements to continue.
- 3.3 We will advertise translation, transcription and interpreting services to our customers in our publications, in all office reception areas and on our customer website.
- 3.4 We will work with customers to understand their individual requirements and decide the most appropriate services to offer, taking into account both the need for fair access and value for money.
- 3.5 We encourage the use of telephone and face to face interpretation services to promote full understanding of rights, responsibilities, services and opportunities for our customers.
- 3.6 Research has shown that the ability to speak English is a positive factor in integrating into the community. We will consider the guidelines set out in Communities and Local Government guidance published in 2007:  

... local authorities, and other government bodies and organisations should think twice before continuing with, or providing new, written translation materials – considering the impact on both those who actually use them, and also thinking through how English speakers will perceive the special provision of written materials that do not feature any English.
- 3.7 We will encourage English language learning by letting customers know about English language lessons that are available in the local area.

## **4 Interpreting**

- 4.1 We will provide telephone interpreting services for customers who are not able to communicate confidently in English. Telephone interpreting services can be accessed from any telephone, including mobile phones; and services are available on demand, without an appointment.
- 4.2 We will provide face to face interpreting services for customers who are deaf or who have a hearing impairment, and those who are not able to communicate confidently in English. Appointments can be arranged at Group partner offices, in the homes of customers, and in other locations as necessary.
- 4.3 We may not always be able to provide face to face interpreting services where we are not aware of the requirement in advance, or where there is no appointment. However, we can arrange for an interpreter to be present at the next appointment.

- 4.4 We will not use staff members, or a customer's family members or friends to provide interpreting services. However, they may at times provide assistance, for example, to help arrange an appointment where a professional interpreter can be present. This is for two main reasons; firstly we need to ensure translated information is accurate and free from bias. Secondly, provision of translation service is a highly skilled activity which we should not expect staff members to perform free of charge and without training.
- 4.5 We can provide interpreters of a requested gender where appropriate. We can also arrange for an interpreter from outside the local area. This may be particularly important when investigating incidences of antisocial behaviour, harassment or domestic abuse.

## **5 Translation and Transcription of documents**

- 5.1 Where customer profiling has identified a particular format requirement, for example, Braille, large print, Audio or Easy Read; we will provide all communication to the customer in this format.
- 5.2 We will not automatically translate documents into other languages without considering whether this offers the most appropriate and relevant service to the customer and best value for money for the organisation.
- 5.3 Whenever we provide a translated document, as part of the service to our customers we will also provide details of English language lessons that are available in the local area. Each Registered Provider is responsible for creating a list of this information and keeping it up to date.
- 5.4 Officers should be alert to the fact some documents may have already been translated. When a document is sent for translation, officers can ask thebigword to check their files to ensure the document has not already been translated.

### **Customer Leaflets**

- 5.5 We will translate our customer leaflets on request. Circle Anglia leaflets contain key information about support services, looking after properties, and tenancy rights and responsibilities. Leaflets are available in reception areas at all Group partner offices, or on request from any member of staff.

### **Tenant Handbook**

- 5.6 Group partners will assess each request to translate a tenant handbook, considering the customer's needs and preferences and what represents best value for money for the organisation. Officers will decide with the customer on a suitable approach in each situation.
- 5.7 Officers will need to take time to talk to the customer and confirm their exact concerns. Rather than translate a large document, it may be more appropriate to arrange an appointment for an interpreter to explain the relevant information to the customer.

- 5.8 Alternatively, it may be more cost effective and relevant to provide translated versions of existing Circle Anglia customer leaflets which summarise key points in the handbook.

### **Resident Newsletters**

- 5.9 Group partners will assess each request to translate a newsletter, considering the customer's needs and preferences, and what represents best value for money for the organisation.
- 5.10 It may be more appropriate to arrange a meeting with an interpreter present to talk through a relevant section of the newsletter.

### **Legal documents**

- 5.11 In most circumstances, we will not translate legal documents; this is because the exact meaning of legal phrases could be altered through translation. This includes documents such as:
- Tenancy agreements and other occupancy agreements
  - Statutory consultations
  - Legal notices
- 5.12 We will provide telephone and face to face interpreting services to explain the information in any key documents. This is particularly important when doing a sign-up for a tenancy agreement or lease, to ensure the resident understands the contract.
- 5.13 Where a customer's individual circumstances have been assessed and it is considered necessary, a legal document may be translated. Officers must explain to customers, with the help of an interpreter if necessary, that meaning may be altered by translation, and the legal definition will be determined by the original language version.

## **6 Responsibilities**

- 6.1 Group partners are responsible for budgeting for and arranging translations of all local documents for their residents and service users, this includes items such as rent statements, newsletters, letters, local leaflets and handbooks.
- 6.2 The Group Policy Team is responsible for translating Group-wide documents upon request. This means documents which apply to every Group partner and do not contain any locally-specific information, names or logos.
- 6.3 Please contact the Group Policy Team to confirm if a document is a Group or local document.

## 7 Monitoring

- 7.1 For the contracts with LanguageLine and thebigword each Group partner is set up as a separate unit and invoiced individually. Group partners can monitor their usage of translation, transcription and interpreting services which will help them to analyse trends or common requests and provide a more proactive, tailored service to their customers.
- 7.2 Monitoring information provided by thebigword and LanguageLine includes:
- Languages requested
  - Services used (e.g. translation or interpretation)
  - Volume of requests in any specified period
  - Costs incurred.
- 7.3 If there are any concerns with the translation contracts, please raise them with Group Policy who will liaise with Group Procurement where necessary.

## 8 Equality and Diversity

- 8.1 Circle Anglia will treat all customers with fairness and respect. We recognise that we have an ethical and a legal duty to advance equality of opportunity and prevent discrimination on the grounds of age, sex and sexual orientation, disability, race, religion or belief, gender reassignment, pregnancy and maternity, marriage and civil partnership.
- 8.2 All customers will have access to this document either through the customer website [www.circleanglia.org/customers](http://www.circleanglia.org/customers) or on request to their local Provider.
- 8.3 This document and any related leaflet may be translated or interpreted, or provided in accessible formats such as large print or Braille according to customers' needs.
- 8.4 All staff receive Equality and Diversity training on joining Circle Anglia and are responsible for ensuring that the Equality and Diversity policy is incorporated into all work activities and all dealings with customers and colleagues. The Equality and Diversity policy is available on [www.circleanglia.org/customers](http://www.circleanglia.org/customers) or on request.

## Procedure

### 9 Accessing a telephone interpreter

- 9.1 All telephone interpreting is provided by [Languageline](#).
- 9.2 Staff can access telephone interpretation from office phones or from mobile phones. Information stickers can be ordered from Languageline to stick onto phones with directions for accessing languageline interpretation.
- 9.3 To access the service:
- Dial 0845 310 9900
  - Quote the correct code for your Group partner / central services (see below)
  - Give the operator the name of the Group partner you are calling from and your surname and initial on request
  - Tell the operator what language you require.
- 9.4 Tell the operator whether you have the customer with you, or whether you want to set up a three-way call. If you are requesting a three-way call, you will need to provide them with the customer's phone number.
- 9.5 The operator will connect you to an interpreter, who will give you their name and identity number. Explain briefly to them the scenario (i.e. you are calling from a housing association, you need to communicate with a customer, if you know what it's about, let them know).
- 9.6 The interpreter will then speak to the customer and the conversation proceeds.
- 9.7 The call will be charged to the Group partner you are calling from. Invoices will be sent to the designated person at each Group partner to process.

#### Access codes

Group Partner	Code	Lead Contact
Central Services	L54899	Cathy Devlin
Circle 33	L54900	Jacqui Airey
Commercial & Leasehold	L56096	Paula Steel
EPIC Trust	L54901	Stefan Langford-Rose
Invicta Telecare	L54902	Stuart Ilsley
Mole Valley	L54905	Dave Jackson
Old Ford	L54906	Scott Fissenden
Roddons	L54907	Fiona Bebbington

Russet	L54908	Lesley Hardwick
South Anglia	L54909	Tracy White
Wherry	L28487	Danielle Thorne

## 10 Arranging a face to face interpretation

- 10.1 We have a contract with [thebigword](#) to provide face to face interpretation. Their rates, which include all expenses and travel costs, are £39 per hour in the London area and £50 per hour outside of London.
- 10.2 To arrange a face to face interpretation with thebigword, staff should complete the [interpreting request form](#), email it to [ukgov@thebigword.com](mailto:ukgov@thebigword.com).
- 10.3 Invoices will be passed to the designated person at the relevant Group partner to process.

## 11 Arranging a translation of a document into another language

- 11.1 We have a contract arranged with [thebigword](#) to provide all document translation. We have negotiated competitive Group rates with this company.
- 11.2 To arrange a document translation from thebigword, staff should complete the [translation request form](#) and email it to [ukgov@thebigword.com](mailto:ukgov@thebigword.com) with a word copy of the document which requires translation.
- 11.3 To avoid duplicate translations, and the extra cost this incurs for the organisation, you can check [this folder](#) or ask thebigword to check their records to ensure the document has not previously been translated.
- 11.4 If you have previously had a document translated, and the document has since been updated. When you next require a translation, you can ask thebigword to update the previous translation with the new information. This offers better value for money than translating the whole document again.

## 12 Arranging a transcription of a document into another format

### Braille or audio formats

- 12.1 To arrange a Braille or audio translation from thebigword, complete the translation request form and email it to [ukgov@thebigword.com](mailto:ukgov@thebigword.com).

### Large Print and electronic copies

- 12.2 To arrange for a Large Print version, re-size all text in the document to size 18 before printing or emailing it.
- 12.3 If a customer asks for an electronic version of a document, email can be used, where the customer has an e-mail address. Or alternatively request a CD-Rom from IT services, save the document onto the CD-Rom and post it to the customer.

## 13 Communicating with people with hearing difficulties by telephone

### Using a Textphone or Minicom

13.1 People with hearing difficulties may choose to use a textphone or 'minicom'. This is a device which allows a conversation to take place by typing text messages from one phone to another over a standard telephone line.

13.2 Where a group partner has a textphone device, or wishes to install one, it requires a separate phone line and number. The customer then dials our minicom number, and the conversation takes place by typing.

13.3 When carrying out a conversation via textphone, there are some important codes to assist conversation:

**GA** – go ahead – indicates that you have finished your sentence and the person on the other end of the line may proceed with their next sentence.

**BIBI** – bye bye – indicates that you have finished your half of the conversation.

**SK** – stop keying – indicates that the conversation is over, one person or the other can put SK on the end of BIBI to indicate that they are ending the conversation.

### Using a Text Relay service

13.4 Where a group partner does not have a textphone, a conversation can be carried out between a verbal telephone and a textphone by using a Text Relay service – which is available 24 hours a day.

13.5 To make a call from a verbal telephone to a textphone dial 18002 followed by the full telephone number. The prefix 18002 engages a Text Relay operator who will translate the conversation between verbal and text devices.

13.6 The textphone user types a message from their keyboard and the operator reads it word for word to the hearing person. The hearing person then verbally responds, and the Text Relay operator types exactly what is said so that the deaf person can read the conversation on their textphone display panel.

13.7 To make a call from a textphone to a telephone, 18001 is dialed followed by the full telephone number. If the call is answered verbally, a Text Relay operator will join in the call. However, if the call is answered by a textphone, the connection is direct, and the operator will not become involved.

13.8 See [www.btplc.com/inclusion](http://www.btplc.com/inclusion) and [www.textrelay.org](http://www.textrelay.org) for more information.

## Glossary

Term	Definition
Customer	Refers to current residents and service users, and applicants for the housing or services that Circle Anglia provides.
GPF	Group Policy Forum
Interpreting	Where one language is verbally translated into another by a person who knows both languages. Interpreting also includes British Sign Language non-verbal communication
KLOE	Key Line of Enquiry. These are set out by the Audit Commission to assess an organisation's service delivery.
Languageline	The company that Circle Anglia use for our over-the-phone interpretation services.
LES	Limited English Speaker
SMPRG	Senior Managers' Policy Review Group
Transcription	Creating an alternative format of a document such as large print, audio, Braille or Easy Read
Translation	When a written communication is converted from one language into another, retaining the original meaning.
thebigword	The company that Circle Anglia use to provide translation, transcription and interpretation services.

## Related Documents

Document	Link
<b>Connected Policies:</b>	<a href="#">Equality and Diversity</a>
<b>Forms and Letters:</b>	<a href="#">Interpreting Booking Form</a> <a href="#">Translation Request Form</a>
<b>Leaflets:</b>	<a href="#">Languageline Language Identifier</a>
<b>Other:</b>	

## Version history

<b>Version no.</b>	1	<b>Date effective:</b>	October 2006
<b>Brief summary of changes:</b>	n/a – new group policy		
<b>Staff consultation (teams):</b>	SMPRG, Staff,		
<b>Resident consultation:</b>	OF HS, OF TML		
<b>Signed off by:</b>	GPF, 23 <sup>rd</sup> October 2006		
<b>Author:</b>	Jonathon Cox, Quality Manager		
<b>Version no.</b>	2	<b>Date effective:</b>	March 2010
<b>Brief summary of changes:</b>	<p>New group partners included.  Policy amended to reflect the government agenda, assisting with English learning and providing a tailored service of translation and interpretation.  Information about new group contracts added.</p>		
<b>Colleague consultation:</b>	SMPRG, MDs, Continuous Improvement colleagues.		
<b>Resident and service user groups consulted:</b>	<p>All Group Partner reps were asked to survey involvement groups.  Feedback received from:  EPIC Policy Forum – London and Eastern Regions by email Dec – Jan.  Old Ford Federation 1<sup>st</sup> December 2009  Roddons RI Tenant Advisory Group - Weds 27<sup>th</sup> January 2010</p>		
<b>Results of resident and service user consultation:</b>	<p>Clarity added to definitions of translations, transcriptions and interpreting 1.3</p> <p>Residents and service users stated that we must consider the equality and diversity of those who do not speak English fluently and ensure we meet legal and good practice obligations to them, eg equal access.1.3, 2.1-2.3.</p> <p>Concern was also shown over the amount of money that is spent on translation services 2.3.</p> <p>Nearly all residents were in favour of the housing or support provider offering assistance with information about English lessons in the local area. 3.7</p> <p>Residents and service users were asked if there were any documents we should not translate. Some residents felt strongly that information that would rapidly date, and therefore not be relevant, should not be translated – newsletters such as Home Matters was used as an example.</p>		
<b>Other consultation:</b>			

<b>Signed off by SMPRG:</b>	11 <sup>th</sup> February 2010
<b>Final Sign-off:</b>	Group Policy Forum, 25 <sup>th</sup> February 2010
<b>Author:</b>	Amy Carter, Group Policy

<b>Version no.</b>	3	<b>Date effective:</b>	
<b>Brief summary of changes:</b>			
<b>Colleague consultation:</b>			
<b>Resident and service user groups consulted:</b>	State which groups were consulted and what dates they were consulted		
<b>Results of resident and service user consultation:</b>	State what policy changes were made as a result of resident and service user consultation		
<b>Other consultation:</b>	Include legal, professional, consultant, LA		
<b>Signed off by SMPRG:</b>			
<b>Final Sign-off:</b>			
<b>Author:</b>			