



# **Translation & Interpretation Policy & Procedure**

**February 2023**

Consultation completed:	February 2023
Approved:	February 2023
Review Date:	January 2026

<b>Section</b>	<b>Contents</b>	<b>Page</b>
1.	Introduction	3
2.	Aims and objectives	3
3.	Scope	3
4.	Legal and regulatory framework	3
5.	Responsibilities	4
6.	Confidentiality	5
7.	Responses to breach of policy	5
8.	Equality, Diversity, Inclusion	5
9.	Reporting & Review	6
Appendix 1	Procedure: Staff Guidelines	

## 1. Introduction

- 1.1 The Queens Cross Group (QCG) wants all its customers to have the same opportunities to access and request services regardless of their age, disability, race, religion or belief, gender, sex or sexual orientation.
- 1.2 Extensive customer profiling has shown the diversity of our communities and we are committed to ensuring that everyone is able to access services on an equal basis.
- 1.3 As part of our Equality and Diversity Strategy and our commitment to the nine protected characteristics defined by the Equality Act 2010, we want to ensure our communication is tailored to customers' individual needs.

## 2. Aims and Objectives

- 2.1 This policy provides guidance to all QCG staff, suppliers and contractors when communicating with customers who speak little or no English and who therefore have a specific translation or interpretation need.

## 3. Scope

- 3.1 This policy applies to all QCG employees, agency and session staff, contractors and other staff working on behalf of the Group.
- 3.2 QCG funds translation and interpretation services required by those staff in order to carry out its business.
- 3.3 Translation and interpretation services are accessed through approved suppliers such as Happy to Translate or other recommended translation services, as part of this policy and related procedure (see Appendix 1, Translation & Interpretation Procedure).

## 4. Legal and regulatory framework

- 4.1 Relevant legal and regulatory information is listed here:
  - 4.1.1 Public Sector Equality Duty in Scotland 2010
  - 4.1.2 Equality Act 2010
  - 4.1.3 The Housing (Scotland) Act 2010
  - 4.1.4 The Human Rights Act 1998
  - 4.1.5 Hate Crime and Public Order (Scotland) Bill 2021
- 4.2 Other relevant guidance and information:
  - 4.2.1 Scottish Government Equality and Rights policies ([www.gov.scot/equality-and-rights](http://www.gov.scot/equality-and-rights))
  - 4.2.2 Scottish Government, *A Fairer Scotland for All Action Plan* 2016, reviewed annually;
  - 4.2.3 United Nations Sustainable Development Goals.
  - 4.2.4 Scottish Federation of Housing Associations, *Social landlord self-assurance*, toolkit, June 2022

## 5. Responsibilities

5.1 It is the responsibility of all QCG employees to comply with this policy and to work towards embedding its principles and procedures into everyday working practices.

5.2 Although staff must always seek to provide a cost effective and best value service, the needs of the individual requiring the service will always be paramount. Staff will, for example, seek to ensure that matches for language and dialect are taken into account and that gender or other equalities issues are addressed.

5.2 Overall key areas of responsibility for the implementation of the policy are as outlined below.

### 5.2.1 Leadership Team Responsibilities

To:

- Ensure that the policy is understood and implemented by all service teams, suppliers and contractors.
- Review progress of implementation of the policy and procedure across services.
- Ensure that adequate resources are available for implementation of the policy.
- Develop the organisational culture in which this policy can operate.
- Promote a working culture that respects and values differences and promotes respect, equality, diversity, inclusion and fairness.
- Challenge discrimination in all areas of their service.

### 5.2.2 All Staff Responsibilities

To:

- Comply with the principles outlined in this policy in order to encourage diversity, promote equality of service delivery and eliminate discrimination.
- Ensure that they understand and implement the policy and procedure in their daily working practices.
- Provide a sympathetic and understanding approach to ensure that customers are comfortable in asking for help with their language needs.
- Promote a working culture that respects and values differences and promotes respect, equality, diversity, inclusion and fairness.
- Challenge discrimination in all areas of their service.

### 5.2.3 Contractors & Partners

To:

- Operate in accordance with QCG's equality and diversity principals and objectives as outlined in this policy.
- Ensure that they understand and implement the policy and procedure in their daily working practices.

- Provide a sympathetic and understanding approach to ensure that customers are comfortable in asking for help with their language needs.
- Promote a working culture that respects and values differences and promotes respect, equality, diversity, inclusion and fairness.
- Challenge discrimination in all areas of their service.

## **6. Confidentiality**

- 6.1 By its nature, the use of an external third party in a conversation with a customer means that the customer's confidentiality must be respected at all times. The interpreter or translator involved will only be given information about an individual or customer household required to carry out their role. They will be expected to treat any personal information given by the customer or staff member with the strictest confidence.
- 6.2 Colleagues with specialist language skills can be asked to interpret for a customer but it is preferred that this isn't in situations where issues of a very private or personal nature are under discussion in order that professional interpretation services can be provided as well as monitored and measured.
- 6.3 We sometimes ask young people aged 16 and above, friends and relatives to interpret for family members. In order to maintain a customer's confidentiality we would do this only as a last resort or in an urgent or emergency situation.
- 6.4 We would only use children under the age of sixteen as interpreters for family members as a last resort and in urgent or emergency situations. This is especially important when sensitive issues, such as rent arrears, eviction proceedings, family or health issues are being discussed.

## **7. Responses to breach of policy**

- 7.1 Customers who feel they may have a complaint under this policy or who think that QCG may have acted in a discriminatory or unfair way can make a complaint which will be considered under the relevant Complaints Handling Procedure.
- 7.2 Complaints information and trends will be monitored across protected characteristics through tenant profiling information and this information will form part of QCG equality and diversity performance management indicators.
- 7.3 Where an employee feels that they have a complaint under this policy, they should report this to their line manager (unless the claim is against their manager; in such circumstances the employee should raise the issue with the manager next in line or with a member of the Human Resources team) and this will be dealt with in line with QCG's Dignity at Work Policy and procedure.

## **8. Equality, Diversity, Inclusion**

- 8.1 QCG is committed to the principles of equal opportunities and equal access to its services. All staff are expected to implement this policy in an equal and non-

discriminatory way.

- 8.2 In particular, QCG will not discriminate against any customer on the grounds of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, or sex.

## **9. Reporting & Review**

- 9.1 The Equality, Diversity & Inclusion (EDI) Working Group will monitor and review progress against the objectives set out in this policy and procedure.
- 9.2 The use and cost of translation and interpretation services will be recorded and reported to the Leadership Team on a quarterly basis.
- 9.3 We continue to provide all staff with the training and resources to develop their use of translation and interpretation services. The training will be reviewed by the EDI Working Group in line with the policy review period every two years.
- 9.4 This policy will be subject to review every two years in consultation with the Association Board, staff, customers, EDI Working Group and other stakeholders. QCG will make any necessary alterations to this policy in advance of a two-year review in the event of any significant legislative or statutory changes or practices which requires incorporation into this policy.

# Appendix 1

## Translation & Interpretation Procedure: Employee Guidelines

### 1. A quick guide

We want to provide the best possible service to our customers. So, when looking for a translation or interpretation service:

What language?

- On QL, you can find a customers' language need at the top of their first client contact page (see Image 1)
- If the language preference isn't recorded but you know what it is, you can record it there.
- If the customer is not a tenant, then use the Happy to Translate resources kept on Source or in a Happy to Translate folder kept at reception to identify their preferred language.

Meetings & services

- We consider and adapt for customers' language needs when arranging meetings, customer focus groups or other public forums.
- We use Happy to Translate resources to assess a customer's interpretation or translation requirements.
- We signpost customers to other related services where appropriate.

### 2. Interpretation and Translation

#### 2.1 Resources

There are resources available to staff when supporting customers with specific translation or interpretation needs. These include:

**QCHA customer held data held on QL** - Where a QCHA customer has stated a language preference or other communication need, these are recorded on QL.

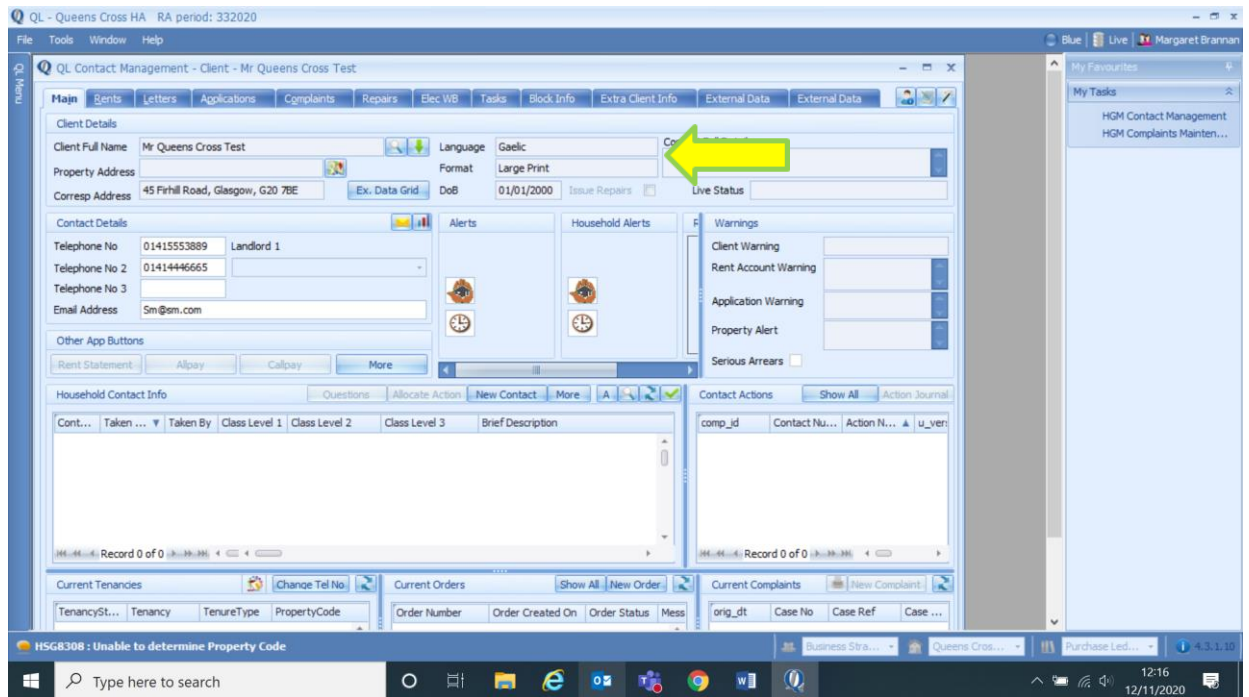
You can record or find a customer's language preference by looking at the home page of a customer record on QL.

Some people who need support with understanding and communicating information due to their first language not being English may not have had the opportunity to learn to read and write in their own language.

They also may feel self-conscious about having literacy difficulties. There are sensitive ways of addressing this such as giving people a choice of receiving spoken or written

information in their preferred language. It may be useful to highlight this on their records.

## Image 1



**Happy to Translate** – QCG is a member of Happy to Translate. Happy to Translate (HTT) is a national scheme that supports organisations to engage with customers who speak little or no English.

All staff have access to HTT's services and their toolkit is available online and on Source. Full details of how to use their services can be found on the membership area of HTT's website [www.happytotranslate.com](http://www.happytotranslate.com)

If you haven't used the service before, you can log on using:

Email: [contactus@gcha.org.uk](mailto:contactus@gcha.org.uk)  
Password: Queenscross21!

The toolkit provides language cards and flag charts that allow customers to indicate their preferred language. A language chart, flag chart and point pages with key phrases are available in a folder at reception in Firhill Road to help staff with basic customer communication.

Appointment confirmation sheets can also be completed with a customer in their own language.

**Happy to Translate app** - Happy to Translate services are available through the app. The app has been downloaded on to all QCHA mobile phones and other devices but, if this is not the case, contact the IT team.





**To sign up to the app for the first time:** all you need is your email address and Queens Cross's unique access code (see below). You'll then need to create a password. Once done, you'll receive an email from Happy to Translate to confirm your email address and your app will then be ready to use.

**Unique Access Code: HACNPQUB**

## 2.2 Translation

Translation is the conversion of **written text** from one language (source language) to another (target language).

We accept that it isn't practical or feasible to hold all of the Queens Cross Group's written or printed material in all possible languages. It's important to ensure however that required material will be translated in to a language as soon as possible at a customer's request.

Before you ask for a document to be translated or get a quote, check if the document's already available either by contacting the Business Strategy team or asking your colleagues.

If you decide to go ahead, you can use the Translation Services list on Source or Happy to Translate's [Language Service Provider Directory](#) where you can find a list of translation services.

It is advisable to request a quote for the work to be translated and confirm whether it is by page or by word count.

Once translated, the document should be sent to the Business Strategy team in order that it can be uploaded to Source and other colleagues can use it.

**Note:** Translated information, such as a tenancy agreement, can often be better explained by use of an interpreter. An interpreter will be able to explain parts of a document where a customer may require greater clarification.

## 2.3 Interpretation

Interpretation refers to the **spoken word**. Interpretation can be done over the telephone, online and face-to-face.

You can find advice on how to prepare for and use interpretation services and a list of suppliers on Source using the Translation Services list on Source or on the Happy to Translate directory:

Advice <https://toolkit.happytotranslate.com/using-htt/interpretation-translation-tips>  
Suppliers <https://toolkit.happytotranslate.com/translator-directory>

It's our responsibility to find a suitably qualified interpreter and to fully brief them about the issues, background and practical purpose of the discussion with the customer. It's our responsibility to also make sure that the interpreter is clear about issues such as:

- Their role in the discussion
- The need for confidentiality
- The standard of behaviour and conduct expected.

## 2.4 Budget code, monitoring

Once you have used a translation or interpretation service, you will need to raise a PO for the service's invoice. Use the following corporate budget code when raising a PO to allow accurate recording and monitoring of translation services across the QCG.

**Budget code: 4345**