

Translation and Interpreting Policy



1. Introduction

1.1 This policy sets out Clarion's approach to the provision of translation and interpreting services for our residents who cannot communicate in English. While there is an expectation that residents will try to acquire English language skills, there are circumstances where the provision of professional translation and interpreting is appropriate, and Clarion will arrange the necessary provision.

2. Policy Objectives

2.1 The main objectives of the policy are to set out when it may be appropriate for Clarion to arrange and fund translated materials or interpreting services to ensure our residents with language needs can access our services, as well as ensuring we comply with our legal duties and regulatory requirements.

3. Scope

3.1 This policy relates to translation and interpreting for non-English speakers and the provision of British Sign Language (BSL) interpreters for deaf residents. Other communication needs should be considered under the terms of Clarion's Vulnerable Residents and Reasonable Adjustments Policy.

3.2 The policy applies to all departments across Clarion Housing Association who provide service to Clarion tenants.

3.3 For the purposes of this document, the following distinction is made between **translation** and **interpreting**:

- **Translation:** relates to the written word (transferring information or ideas expressed in written form from one language to another)
- **Interpreting:** relates to the spoken word (transferring information or ideas expressed orally from one language to another).

3.4 This policy applies to Clarion tenants and shared owners, and to customers who are applying to Clarion for housing. Should homeowners require translations, interpreting or BSL interpreting they are responsible for making their own arrangements.

4. The Policy

4.1 Clarion aims to take a fair, practical and cost-effective approach to the provision of interpreters and translation with consideration being given to the importance of the information that needs to be communicated, alternative ways to communicate it, and the resident's circumstances.

4.2 We will ask tenants at first contact about their language and communication needs and record this on the customer contact record so that staff are aware if an interpreter or BSL interpreter may be required.

4.3 All customer information on Clarion's website can be translated by the customer using the Recite Me functionality which is software that allows customers to view web content in other languages or formats. Where a resident makes a request for either translated written materials or an interpreter,

consideration should be given as to whether the same or similar information can be provided by an alternative means without substantially disadvantaging the customer. We will work with our residents to understand what arrangements they usually use to communicate with other service providers and companies to see if that is appropriate for the circumstances.

- 4.4 We will not rely on children under 16 for interpreting or translating unless it is an emergency or for very basic interactions.
- 4.5 Particular consideration should be given to those who may be more vulnerable such as migrants and refugees, young people or those with learning disabilities that may compound any language needs.
- 4.6 In urgent situations, Clarion may utilise the language skills of fluent bi-lingual staff members to assist with interpreting and translation or who are qualified in BSL, where they have capacity to do so.
- 4.7 Where we need to be sure that a resident is aware of their rights and obligations, i.e. when signing a tenancy agreement, understanding a rent increase letter, a legal notice, or a health & safety related matter such as gas servicing or fire safety, we will include a statement that the customer can ask for the document to be provided in another language. When such requests are received, the relevant team will arrange to have the document translated or arrange for an interpreter to read it to them.
- 4.8 We will publish this policy and information on Clarion's customer website so that tenants are aware of how we can support them in meeting their language needs.
- 4.9 Where the situation is particularly sensitive, for example discussing actual or suspected domestic abuse, or a safeguarding concern with a victim who does not speak English or uses BSL to communicate, we will arrange for a professional interpreter. In some urgent situations such as an unplanned decant or major incident we may need to initially rely on bi-lingual Clarion staff members, staff of an external agency or other professional person supporting the resident to interpret until a professional interpreter can be arranged where that is required. This will normally be over the phone but can be in person if necessary.
- 4.10 Where Clarion requires written confirmation of information provided by a resident, for example a birth, death or marriage certificate or a form of identification, we will usually expect the resident to provide these in the English language certified by a professional translation service if the original is in another language. If they are unable to do this, we will arrange for the document to be translated.
- 4.11 In our social housing residential settings with shared communal facilities such as our older persons accommodation, we will ensure that any Clarion health and safety notices on main noticeboards and any operating instructions for example in laundry rooms, are clearly explained to any resident who doesn't read English and/or we will arrange for notices and instructions to be translated and displayed in agreement with the resident(s).
- 4.12 Where a resident's request for translated documents or an interpreter has been refused, the resident or their representative can ask for the decision to be reviewed – this request can be made on the phone or in writing. Consideration will be given by the staff member involved to ensure that the resident understands their right to review. The decision will be reviewed by a Head of Service within 10 working days of the appeal being made.

5. Roles & Responsibilities

- 5.1 All Clarion staff who provide services to our residents are responsible for implementing this policy. The policy will be kept under review and updated by the Housing Projects team.

6. Monitoring and Compliance

- 6.1 Heads of Service will ensure that their staff are aware of this policy and the associated procedure that sets out how to arrange for interpreting and translation services and know how to comply with it.

7. Associated documents

- Translation and Interpreting Procedure
- Vulnerable Residents and Reasonable Adjustment Policy.

8. Glossary

Decant – where a Clarion tenant has to be rehoused temporarily or permanently because of an unexpected event such as a fire or flood.

9. Legal / regulatory compliance

- 9.1 While Clarion is not a public body under Schedule 19 of the Equality Act 2010 (the Act), as a social landlord we may be considered as carrying out a public function in activities such as the provision of social housing. For those activities we have a duty to advance equality and foster good relations between people who share one of the nine protected characteristics and people who do not share it as set out in the Act. Protected characteristics of particular relevance in the context of translation and interpreting are race, sex, age and disability. The ability to communicate effectively with our residents to help them access our services assists in achieving equality between groups.
- 9.2 While we must avoid direct or indirect discrimination under the Act, we can also consider whether the provision of translated materials or an interpreter is proportionate, i.e. can the cost be justified? Consideration should be given to the seriousness of the subject being discussed and any risk of inaccurate or incomplete interpretation if relying on family members or friends. Children under 16 should not be asked to interpret or translate unless in an emergency or for very basic interactions.
- 9.3 The regulatory consumer standards require Clarion to ensure that in treating our residents fairly we consider how we can adapt our services and communications to meet individual tenant's needs. We must ensure that communication with and information for tenants is clear, accessible, relevant, timely and appropriate to their diverse needs. The regulatory Code of Practice states that we should make tenants aware of the different ways we can meet their needs.

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