

# Customers & Communities

## Policies & Procedures



# Translation and Interpretation Policy

1.	Policy & Procedure objectives
1.1	<p>This Policy sets out Watford Community Housing's ('WCH') approach to using translation and interpretation services as a provider of housing and housing-related services and provides assurance that there are appropriate measures in place to support our communication with: -</p> <ul style="list-style-type: none"><li>• Non-English speaking customers;</li><li>• Customers for whom English is not their first language;</li><li>• Customers with hearing or visual impairments;</li><li>• Customers who are registered deaf and/or blind; and</li><li>• Customers with learning difficulties.</li><li>• Customers that wish to engage with our opportunities</li></ul>
1.2	<p>The aim of this Policy is to guide staff and customers on WCH's approach to translation and interpretation services and help improve equitable outcomes and the overall experience for our customers. In accordance with our commitment to delivering high quality services and the expectations set in the revised consumer standards.</p>
1.3	<p>We know that customers in our local communities will have a range of communication needs. They may have physical or sensory impairments impacting on their communication skills and/or English may not be their first language.</p>
1.4	<p>We will always seek to communicate with our customers as clearly and effectively as possible taking into account their individual needs. It is our staff members' responsibility to check whether a customer has a disability or any additional needs that may require communication support. Staff members can do this by referring to our customer profiles on the Housing Management system. Information about future customers will be recorded by local authority partners as part of their application.</p>
1.5	<p>We will strive to provide a one-to-one tailored service to our customers. However, we are aware that customers may wish / need to use family, advocates or trusted members of their community to support them in communicating with us.</p>
1.5.1	<p>There are situations where this will not be appropriate such as speaking to children of a tenant to discuss sensitive issues relating to the tenancy i.e. rent arrears, domestic abuse, antisocial behaviour or relationship breakdown. Where the tenant</p>

	insists on using their own representative, we will work with family members (other than children) and advocates inclusively with customers' informed consent.
<b>2.</b>	<b>Legislative or regulatory requirements</b>
2.1	<b>Legislative:</b>
2.1.1	Equality Act 2010
2.1.1.1	WCH has a legal duty to protect our customers (when taking up our services or buying / renting a property) from unlawful discrimination.
2.1.1.2	It is against the law to treat anyone less favourably because of their: <ul style="list-style-type: none"> <li>• <b>Age;</b></li> <li>• Gender reassignment;</li> <li>• Martial status or being in a civil partnership;</li> <li>• Pregnancy status or being on maternity leave;</li> <li>• <b>Disability;</b></li> <li>• <b>Race including colour, nationality, ethnic or national origin;</b></li> <li>• <b>Religion or belief;</b></li> <li>• Sex; or</li> <li>• Sexual orientation.</li> </ul>
2.2	<b>Regulatory:</b>
2.2.1	RSH Tenant Involvement and Empowerment Standard 2017: <p>1.1 Customer service, choice and complaints</p> <p>1.1.1 Registered providers shall:</p> <p>a) provide choices, information and communication that is appropriate to the diverse needs of their tenants in the delivery of all standards</p> <p>1.3 Understanding and responding to the diverse needs of tenants</p> <p>1.3.1 Registered providers shall:</p> <p>a) treat all tenants with fairness and respect</p> <p>b) demonstrate that they understand the different needs of their tenants, including in relation to the equality strands and tenants with additional support needs</p> <p>2.3 Understanding and responding to diverse needs</p> <p>2.3.1 Registered providers shall demonstrate how they respond to tenants' needs in the way they provide services and communicate with tenants</p>
2.3	<b>Governance:</b>
2.3.1	WCH has adopted the National Housing Federation Code of Governance 2020 which requires that: <p>1.3 The Board demonstrates a clear and active commitment to achieve equality of opportunity, diversity and inclusion in all of the organisation's activities.... and seeks regular assurance about how these commitments... are being delivered in practice.</p>
2.3.2	WCH follows the Housing Ombudsman's Complaint Handling Code 2022 which requires that:

	2.5 Landlords must comply with the Equality Act 2010 and may need to adapt normal policies, procedures, or processes to accommodate an individual's needs. Landlords must satisfy themselves that their policy sets out how they will respond to reasonable adjustments requests in line with the Equality Act and that complaints handlers have had appropriate training to deal with such requests.
<b>3.</b>	<b>Scope and definitions</b>
3.1	<u>Scope</u>
3.1.1	This Policy applies to all front-line staff of WCH (including its subsidiary and joint ventures) who should follow this Policy and guidance when they recognise a need for, or receive a request for, either translation or interpretation.
3.2	<u>Definitions</u>
3.2.1	<b>Translation:</b> the process of changing written words from one language into another either as text or as audio.
3.2.2	<b>Interpreting:</b> the use of the same language but communicated through additional methods to enable understanding for users who have hearing or visual impairments, learning difficulties and users who are registered deaf or blind. It tends to include community-spoken languages and sign language.
3.2.3	<b>Braille:</b> refers to the language used by blind or partially sighted people. It involves characters being represented by a series of raised dots on a surface that are felt with the fingertips, allowing blind or partially sighted people to read text that a sighted person would see on a page.
3.2.4	<b>British Sign Language (BSL):</b> refers to the language used by deaf people or those with hearing impairments. It involves communicating through movement of the hands, body, face and head.
3.2.5	<b>Hearing Loop:</b> refers to a special sound system to aid people with hearing aids. The hearing loop provides a magnetic, wireless signal that is picked up by the hearing aid when it is set to 'T' (Telecoil) setting.
3.2.6	<b>Large Print:</b> is the formatting of text in a larger font size (16 point or higher) which can make reading easier for people with a visual impairment.
3.2.7	<b>Makaton:</b> refers to the use of signs together with speech and symbols to enable people to communicate.
<b>4.</b>	<b>Roles and responsibilities</b>
4.1	<b>Customer Experience Manager:</b> is the responsible budget-holder for customer translation across frontline services.
4.2	<b>Managers:</b> are responsible for ensuring that their teams follow this Policy and translate and interpret the key documents set out in section 5.1.2 below.
4.3	<b>All Staff:</b> are responsible for applying this Policy when recognising a need for or receive a request for either translation or interpretation or a request for comms support.

<b>5.</b>	<b>Translation</b>
5.1	As mentioned at 3.2.1 above, translation refers to the conversion of written or spoken words from one language into another. To accommodate our customers who require this service, WCH provides the following methods of translation:
5.1.2	<p><b>Use of a translator for telephone support:</b> Where a customer requires access to translation services, staff members can contact the telephone “Language Line” translation service:</p> <p>A full process of how to identify the relevant language for customers and access this service on 0800 169 2879, is detailed on our intranet.</p> <p><b>Use of a translator in person support:</b> Where a customer requires in person translation services, ‘Herts Interpreting &amp; Translation Service’ should be used. Translation services may include customers requesting WCH documents to be translated into another language, including the following:</p> <ul style="list-style-type: none"> <li>• Tenancy Agreements;</li> <li>• Formal / Legal Notices;</li> <li>• Key information relating to a customer’s tenancy i.e. rent increase letters;</li> <li>• Data protection privacy notices; and</li> <li>• Key customer-related policies such as our Customer Feedback Policy and Access to Housing Policy</li> </ul> <p>Certain staff members at WCH may also utilise their language skills to act as informal translators or facilitators for our customers.</p> <p>Where Herts Interpreting &amp; Translation Service has been used but further translation is required, staff members can use the following alternative methods of translation:</p>
5.1.3	<p><b>Select language tool on our website:</b></p> <p>Our website features a ‘select language’ tool which translates our website both verbally and in writing. Our customers can select this feature and translate our website into over 100 different languages.</p>
5.1.4	<p><b>Use of a trusted representative:</b></p> <p>As mentioned at 1.4 above, WCH is aware that many customers can use their family friends, carers, advocates or trusted members of their community to provide support with translation services. To do so, they will need to complete our Permission to Speak Form which is attached to the Person UDC Policy &amp; Procedure available on Grapevine.</p> <p>As mentioned in 14.4 there are situations where this will not be appropriate such as speaking to children of a tenant to discuss sensitive issues relating to the tenancy i.e. rent arrears, domestic abuse, antisocial behaviour or relationship breakdown. Where the tenant insists on using their own representative, we will work with family members (other than children) and advocates inclusively with customers’ informed consent</p>
<b>6.</b>	<b>Interpretation</b>
6.1	As stated at 3.2.2 above, interpretation is the communication of the same language but through a different method to spoken and written words. It is commonly used for

	<p>customers who have hearing or visual impairments, learning difficulties and users who are registered deaf or blind. To aid the understanding of our customers who fall within these categories, WCH provides the following methods of interpretation:</p>
6.1.1	<p><b>Use of British Sign Language (BSL):</b> Where customers require the use of BSL this can be provided by Herts Interpreting &amp; Translation Service.</p> <p>A small number of our staff have basic level training in BSL and deaf awareness training (level 1) which may also assist staff communicating BSL with our customers (information can be found on our intranet about the relevant staff).</p>
6.1.2	<p><b>Watford talking newspapers:</b> Our office features 'Watford Talking Newspapers', a local and free service which provides audible news reports provided by The Watford Observer. This is available on request.</p>
6.1.3	<p><b>Use of Braille:</b> Communications in the form of Braille via Herts Interpreting &amp; Translation Service can be made available on request to accommodate our customers who are registered blind.</p>
6.1.4	<p><b>Use of Large Print Text:</b> Where customers have visual impairments, they can request communication and documentation to be made in large print text. This is free of charge and available on request.</p>
6.1.5	<p><b>Use of a professional interpreter:</b> Where customers are in need of a professional interpreter, staff can refer them to Herts Interpreting &amp; Translation Service.</p>
6.1.6	<p><b>Audio files:</b> We can provide certain information or documentation in an audio file format to accommodate our customers who are registered blind or have visual impairments. All audio files are free of charge and available on request.</p>
6.1.7	<p><b>Hearing Loops:</b> Our office features a hearing loop system to assist our customers with hearing aids when attending our head office or community hubs.</p>
6.1.8	<p><b>Use of Makaton:</b> Some of our customers may have cognitive impairments, autism, dementia, down syndrome, specific language impairment, multisensory impairment or acquired neurological disorders that can negatively affect their ability to communicate. To support these customers, Makaton is available on request.</p>
<b>7.</b>	<b>Diversity and Inclusion Considerations</b>
7.1	<p>WCH will act fairly and consistently in the application of this Policy and Procedure and will not discriminate against any person on the grounds of their age, race, ethnicity/nationality, gender, religion, sexual orientation, marital/civil partnership status, pregnancy status or disability.</p>

<b>8.</b>	<b>Data Protection Considerations</b>
8.1	When supporting customers' communication needs, staff members may handle 'special category personal data' as defined under data protection law such as our customers': <ul style="list-style-type: none"> <li>• Racial or ethnic origin;</li> <li>• Religious beliefs; and</li> <li>• Health.</li> </ul>
8.2	As a result, all staff must ensure that they are handling data in compliance with our Data Protection Policy available on Grapevine.
<b>9.</b>	<b>Related documents</b>
	Communications Strategy 2020-25 Customer Feedback Policy Access to Housing Policy Data Protection Policy Person UDC Policy & Procedure
<b>10.</b>	<b>Approval</b>
	Approved by: EMT October 2023 Customer Experience Committee January 2024
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