

# **Translation and Interpretation Policy**

## **Peterborough City Council**



**Growing the right way for  
a bigger, better Peterborough**

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## **1. Introduction / Purpose of this policy**

Peterborough City Council is committed to meeting the needs of all of its residents, and ensuring that it meets its statutory obligations to ensure equality of opportunity, and not to discriminate against any person. The city of Peterborough is home to a very diverse population, and it is officially recognised that there are now over 100 languages spoken in the city. There are also approximately 1000 people registered blind or partially sighted, and approximately 500 people registered as deaf or hard of hearing. To meet the needs of all residents, it may sometimes be necessary to translate communications, or provide an interpreter. This procedure is designed to ensure consistency in the use of translation and interpretation services, and to establish the criteria for their use.

The Council is aware of the opinions set out by the Commission on Integration and Cohesion<sup>1</sup> and supported by the Department of Communities & Local Government.<sup>2</sup> In summary these documents provide that the use of the English language is an important tool in encouraging communities to bind together, and that automatic translation of documents undermines the importance of English as a way of enabling citizens to communicate and relate to each other. With that in mind, the Council does not routinely translate all communications, and uses a more selective approach, targeting both translation and interpretation to particular needs.

Underpinning this procedure is the Council's expressed principle of being accessible.

## **2. Scope**

This policy applies to the Council's customers who:

- have a sensory impairment
- have a learning difficulty
- do not have English as their first language

It applies to the main access channels, namely:

- electronic access to customer services
- telephone
- face to face
- written correspondence

## **3. Definitions**

- Translation: pieces of writing translated from one language to another;
- Interpretation: transfer of ideas expressed orally, or through use of gestures or signs;
- Customer: an inclusive term to include any stakeholder or group who interacts with council services;
- Access channels: routes through which a customer will interact with council services.

## **4. Sources of assistance**

The Council has contracts in place to enable the provision of accessible services to the public. These are currently with Language Line for telephone interpreting, and with Cintra for face to face interpreting and translation. Contractors may change from

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<sup>1</sup> Our shared future : published June 2007.

<sup>2</sup> Guidance for Local Authorities on translation of Publications : published December 2007

time to time, but in choosing providers the Council will always seek to comply with its procurement obligations and achieve value for money.

The Customer Services team and the Children's Services Minority Ethnic New Arrivals (MENA) team include staff specifically recruited for their language skills, reducing the need to involve third parties as interpreters. In addition, valuable assistance is provided by the New Link Service, which is not an interpretation and translation service for the Authority, but is a good resource for multilingual assistance to other teams and departments when appropriate.

The Council's website uses Google translate to enable its content to be translated without charge to the customer or the Council. This is to assist with general understanding of the information, but as Google translations are not always accurate, the service should not be used as a replacement for formal translation of documents in appropriate circumstances.

In some circumstances it may be appropriate to use informal interpreters such as a family or friend. However, problems may arise using family members, who may find it difficult to translate accurately and neutrally, particularly if a child is used as the interpreter. It may be necessary to use a family member as the initial interpreter for basic information in an emergency situation, but this should not be the first choice. If an assessment is being carried out by an Approved Mental Health Professional (AMHP) under the Mental Health Act (MHA), family members should only be used in exceptional circumstances. Also, it is very important to use professional interpreters when the information gained may potentially be used in legal proceedings to avoid any issues around misunderstanding when the case reaches court.

If there is no-one suitable available immediately it may be preferable to arrange an alternative appointment when an interpreter can be available.

## **5. The legal duty**

There is no legal duty for all materials to be translated, nor is there any legal duty to have a Translation & Interpretation Policy.

The Council also has a duty under the Children Act 2004 to take all reasonable steps to promote and safeguard the well being of children and young people which include ensuring appropriate translation and interpretation services are provided.

The Council is committed to eliminating discrimination in the provision of its services. It is under a statutory duty to ensure equality of opportunity under the Race Relations (Amendment) Act 2000. It also has a duty under the Equality Act 2010 to ensure that no-one is discriminated against on the basis of any of the 9 protected characteristics of race, disability, age, sex, religion or belief (including lack of religion or belief), gender reassignment, sexual orientation, or marriage or civil partnership. This prohibits both **direct discrimination**, if because of a protected characteristic the Council treats a customer less favourably than it treats or would treat others, and **indirect discrimination**, if the Council applied to the customer a provision, criteria or practice which is discriminatory in relation to a relevant protected characteristic of the customer's; that is, if it puts the customer and people with whom he shares that characteristic at a particular disadvantage when compared with those with whom he does not share it. If the Council adopted a policy which stated that it would not provide translation or interpretation services except at a charge, that is capable of being indirect discrimination.

In addition, the Council has very many statutory duties that it is legally obliged to fulfil, which are too numerous to list. If the Council adopted a policy that prevented or discouraged communication with a sector of the community, then it may fail to deliver a statutory duty by being unable to understand what it is being told by a customer, and what service might be needed.

## **6. Pro-active reasons for translation & interpretation**

The Commission on Integration & Cohesion<sup>3</sup> found there were five main pro-active reasons to provide interpretation and translation services, and the Council follows these principles:

- ensure non English speaking residents are able to access essential services
- ensure people can take part in the democratic process (eg registering to vote)
- support local community groups or intermediaries working directly with new migrants or non English speaking communities
- enable people to function in society and understand rules such as parking controls, rubbish collection
- ensure compliance with legislation and ensure that no-one is disadvantaged because of their inability to communicate.

## **7. Identifying the issue / need for an interpreter**

If there is a communication problem the first staff member to meet the customer should attempt to identify the reason.

Cards provided by Language Line are available in Customer Services and other locations open to the public. These enable the member of staff to identify the customer's principal language if this is not English. Staff should also identify if a British Sign Language interpreter is necessary.

In any situation where the customer is unable to communicate using spoken English, the member of staff responding to that customer must determine whether the customer would be disadvantaged if an interpreter was not provided. If in the member of staff's judgement this would occur, appropriate arrangements for an interpreter should be made. If there is any doubt, the issue will be referred to the appropriate line manager for a decision to be made. It is particularly important that a customer should not be disadvantaged if it is likely that the customer might be seeking access to a statutory service.

## **8. Preparation when an interpreter is to be used.**

If using an interpreter who is not professionally trained and provided under the Council's contracts, they must be reminded of the following points:

- the information is confidential and must not be shared with anyone else
- the role is to transfer the meaning of what is said from one language to the other. The interpreter is not responsible for conducting the interview and should not add personal comments or opinions
- the interpreter may ask for clarity, particularly around expressions and jargon that may not easily translate

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<sup>3</sup> "Our shared futures" : published June 2007

- they must be as accurate as possible, and honest if they have difficulty translating particular points.

In these circumstances the customer also needs to be briefed about the role of the interpreter.

Plain English should be used as far as possible.

If recording an interview, details of the interpreter being used should be included.

An appropriate environment should be provided for any interview, particularly one where an interpreter is to be used, with minimal background noise.

## **9. Deciding when to translate a document**

The reasons set out in section 6 above should be considered, and then the following checklist should be used:

Is it essential to translate this document?

- Who is the target audience and is there evidence that they would otherwise be disadvantaged?
- Which languages / formats is it necessary to translate it into?
- Could the information be disseminated more effectively through community groups?
- Is there a statutory duty to provide written information in translated format?
- What would the impact be of not translating the document?

Does the whole document need to be translated?

- Could a summary of the main issues be translated?
- Could it include details of how to request a translation but not translate pro-actively?

Is the material already available elsewhere in translated form, for example other local authorities, partners such as the police?

If it is not necessary to translate the document itself, could it be useful to include a copy of the attached sheet, which draws attention to the importance of the document, and encourages the recipient to take steps to ensure that they understand it?

## **10. Costs**

Translation and interpretation services, when needed, are provided without charge to the customer.

Budgetary responsibilities are devolved to service areas, and there is no specific budget for these services, rather they are part of the main cost of providing the particular service.

English

It is important that you understand the information attached as it may have legal implications. If you have any difficulty you may want to seek advice in your first language.

Croatian

**NEPREVEDENE INFORMACIJE**

Važno je da razumijete priložene informacije jer one mogu povlačiti pravne posljedice. Ako imate problema, možete zatražiti savjet na svom materinjem jeziku.

Czech

**NEPŘELOŽENÁ INFORMACE**

Je důležité, abyste rozuměl/a přiloženým informacím, protože by mohly mít legální následky. V případě, že byste měl/a jakékoli potíže, je možno, že byste chtěl/a hledat radu ve své mateřštině.

Kurdish-Sorani

گرنگه که تو نه و زانیاریانه تی بگه ی که هاوینج گراوه چونکه نه وانیه نه نجای یاسایی  
لیبکه وینه و و جه بیست نه گهر هه زده نه تیه ک و کینه یه کت هه یه نه و ده توانی داوا  
ناموزگاری بکه یه یه زمانی خوت

Lithuanian

**NEIŠVERSTA INFORMACIJA**

Yra svarbu, kad jūs suprastumėte, jog pridėta informacija gali turėti teisinę reikšmę. Jeigu jums iškiltų kokių nors sunkumų, tuomet jūs galite kreiptis, kad gautumėte patarimus jūsų gimtąja kalba

Pashto

مهمه ده چې له دې سره په ملو ضمیمه معلوماتو ځان پوره کړئ ، ځکه چې ټاپي حقوقي  
عواقب ولري . که ستونزه لرئ کهدا ای شي په خپله اصلي ژبه کې له چانه حقوقي مشوره  
وغواړئ

Portuguese

**INFORMAÇÃO NÃO TRADUZIDA**

É importante que você compreenda a informação anexada, uma vez que a mesma pode ter implicações legais. Se tiver algum problema, talvez seja melhor procurar obter aconselhamento na sua língua principal.

**ENGLISH** It is important that you understand the information attached as it may have legal implications  
If you have any difficulty you may want to seek advice in your first language.

**CHINESE** 文中資料未經翻譯  
圖所附上的資料是有可能涉及到法律上之問題。你是必需明白到其中的內容。  
如你在這方面有困難的話，請找位能使用你的母語之人士來指導你。

**GREEK** ΜΗ ΜΕΤΑΦΡΑΣΜΕΝΕΣ ΠΛΗΡΟΦΟΡΙΕΣ  
Είναι σημαντικό να καταλαβαίνετε τις στατιστικές πληροφορίες διότι μπορεί να έχουν νομικές επιπτώσεις.  
Εάν έχετε οποιαδήποτε δυσκολία θα πρέπει ίσως να αναζητήσετε συμβουλή στη μητρική σας γλώσσα.

**TURKISH** TERCÜME OLMAYAN DETAY  
Ekte verilen bilgının yasal yaptırımını bulunmaktadır, bundan dolayı iyice anlamanız önemlidir.  
Anlamakta güçlük çekersemiz, kendi ana dilinizde yardım istemeniz tavsiye edilir.

**BENGALI** সংযোজিত তথ্যটি বোঝা আপনার জন্য খুব গুরুত্বপূর্ণ কারণ এর আইন সংশ্লিষ্ট অর্থ থাকতে পারে।  
আপনার যদি কোন অসুবিধা হয় তাহলে আপনি আপনার নিজের (প্রথম) ভাষায় উপদেশ চাইতে পারেন।

**HINDI** अनुवाद न की गई सूचना  
यह आदेश एक है कि इसके साथ ही गई सूचना को आप समझें, क्योंकि है एकता है कि इनकी कार्यवाही उपलब्ध सिद्धित है।  
यदि आपकी कोई कठिनाई हो तो, आप अपनी प्राथमिक भाषा में परामर्श की सौच कर सकते हैं।

**GUJARATI** બીજા તરફના બાબત માહિતી  
આ સાથે આપેલી બાબતો તમે સમજ સહી તે અન્યથા છે કેમકે તેમાં કોઈ કાયદા અંગતની બાબતો સંકળાયેલી હોય શકે  
જો તમને કોઈ મુશ્કેલી જણાય તો તમે તમારી પોતાની ભાષામાં સલાહ માની શકો છો.

**PUNJABI** ਜਾਣਕਾਰੀ ਜਿਸ ਦਾ ਤਰਜਮਾ ਠਹੀਂ ਹੋਇਆ  
ਇਹ ਬਹੁਤ ਜ਼ਰੂਰੀ ਹੈ ਕਿ ਜੋ ਵੀ ਨਾਲ ਦਿੱਤੀ ਹੋਈ ਜਾਣਕਾਰੀ ਹੈ, ਤੁਸੀਂ ਉਸ ਨੂੰ ਸਮਝ ਸਕੋ ਕਿਉਂਕਿ ਕਿ ਹੋ ਸਕਦਾ ਹੈ ਕਿ ਇਸ ਦੇ ਕਾਰਨੀ ਭਾਵ ਹੋਣ।  
ਜੇਕਰ ਤੁਹਾਨੂੰ ਸਮਝਣ ਵਿੱਚ ਮੁਸ਼ਕਿਲ ਪੇਸ਼ ਆਉਂਦੀ ਹੈ ਤਾਂ ਤੁਸੀਂ ਆਪਣੀ ਮਾਂ ਬੋਲੀ ਵਿੱਚ ਸਲਾਹ ਨਿ ਸਕਦੇ ਹੋ।

**URDU** بخیر ترجمہ کے معلومات  
یہ بات اہم ہے کہ آپ نیکو معلومات کو اچھی طرح سمجھ لیں کہ نہ ہو سکتا ہے کہ اس کا کوئی قانونی پہلو ہے۔  
اگر آپ کو اسے سمجھنے میں مشکل ہو تو آپ اپنی پہلی زبان میں اسے سمجھنے کے لئے پوچھ سکتے ہیں۔

**POLISH** NIEPRZETŁUMACZONE INFORMACJE  
Zrozumienie załączonych informacji stanowi ważną sprawę, gdyż mogą mieć implikacje prawne  
Jeżeli masz jakiegokolwiek trudności w zrozumieniu tych informacji możesz zwrócić się o pomoc w swoim własnym języku

**ITALIAN** INFORMAZIONE NON TRADOTTA  
E' importante che capite l'informazione allegata perché essa potrebbe avere implicazioni legali  
Se avete qualsiasi difficoltà nel capirla, potreste chiedere consiglio nella Vostra lingua materna