

IPCC translation and interpretation policy

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1. Introduction

This is the Independent Police Complaints Commission's (IPCC) translation and interpretation policy. It sets out our approach to communicating with complainants and stakeholders in the most accessible and effective way.

This policy supports the IPCC's core purpose to increase public confidence in the police complaints system. It is underpinned by our corporate values, in particular the values of 'openness' and 'valuing diversity'. These beliefs support our plans, service delivery and engagement with complainants, as well as providing the IPCC with the framework for how we carry out the work we do.

This policy helps us to deliver our strategic policy to increase awareness, accessibility, engagement and satisfaction in the complaints system by ensuring that we are able to provide a service that meets our customers' needs, as outlined in our business plan for 2014-15. The policy also links to our communications strategy and our access strategy, which states:

“Customers seeking to use the IPCC's service may have special requirements – for example people with disabilities or as a result of having English as a second language. The IPCC is committed to ensuring that its services are accessible to all sections of society.

- We will continue to provide information in other languages and the IPCC will communicate with customers about complaints and appeals in any language (as set out in the Translation and Interpretation Strategy)*
- We will continue to provide information in formats including easy read, large print, audio, Braille and British Sign Language (BSL), and an enhanced service will be provided for those who have special access requirements (including face-to-face communication where required).”*

In the context of the corporate values and duties described above, this document sets out the IPCC's policy on provision of translated materials and use of interpretation services.

1.1. Scope

This policy does not cover the provision of material in the Welsh language (covered by our Welsh language scheme) or formats for people with disabilities, which are mainly available on request. The exception to this is the provision of certain information made available in British Sign Language video format, to which this policy does refer.

Our access strategy details how we intend to offer our service to people who have additional access needs. Our new corporate website and other technology have been designed to meet some of these needs. The new website meets relevant accessibility standards and is speech enabled.

This policy does not cover the approach to IPCC staff who have specific communication needs. Staff who need specific support in order to carry out their work should discuss their needs with their line manager, who should then contact HR for advice.

1.2 Definitions

We are using the following definitions throughout this policy:

Translation refers to the transferring of ideas expressed in writing from one language to another.

Interpreting refers to the transfer of ideas expressed orally or through sign language from one language to another.

1.3 Aims of this policy

This policy aims to:

- improve access to the police complaints system for members of the public who do not have English as a first language
- set out the IPCC's approach to translation and interpretation
- provide guidance for staff

1.4 Contact for queries on this policy

If you have any queries on this policy, please contact the [Corporate Communications team](#).

2. Background

The IPCC provides translated material in two ways:

- 1) general information published on our website, which is translated into a range of languages
- 2) case-related translation and interpretation services, including telephone, face-to-face and written translation services in relation to receiving and responding to complaints.

General information about how to complain, appeal, etc is available in ten languages (in addition to English and Welsh), as standard, on our website. These languages are based on a regular review of the most requested languages. The ten languages available on our website are:

Arabic
Bengali
Chinese
French
Gujarati
Polish
Portuguese
Punjabi
Turkish
Urdu

Information is also available in Easy Read, Braille, audio and large print formats and on a British Sign Language DVD.

Case-based translations are currently assessed on an individual basis and can be provided in most languages by our translation and interpretation suppliers or by using the National Register of Public Service.

2.1 Legal issues

The IPCC recognises its legal duties to promote race equality and disability equality under the Equality Act 2010.

The Equality Act states that it is unlawful for a provider of services to discriminate racially against people using those services. It also requires any organisation that provides goods and services to the public to make reasonable adjustments to ensure that people with disabilities have equal right of access.

We will ensure that our translation and interpretation services comply with the requirements of the Equality Act 2010.

2.2 Communicating with our complainants and stakeholders

As a national organisation covering England and Wales, the IPCC must provide accessible information and communication to a wide-reaching audience.

The Census 2011 identified eight per cent of usual residents in England and Wales aged three years and over with a main language other than English. Of this eight per cent, 20 per cent could either speak English but not well or not speak English at all. The main languages other than English were: Polish, Punjabi, Urdu, Bengali, and Gujarati.

2.3 Review of the IPCC's translation and interpretation service

In order to review the appropriateness of the IPCC's current translation provision, the Corporate Communications team conducted a review of its translation and interpretation service in 2008.

Our review concluded that it would be appropriate to reduce the number of languages that the IPCC translates its materials into as standard. This is in line with the recommendations made by the Commission on Integration and Cohesion in its report "Our Shared Future", published in June 2007. As well as this, we decided to simplify the information to be made available in languages other than English in order to address the fact that mother-tongue literacy levels of non-English speakers are not high.

In 2014, we assessed our use of translation and interpretation services through our corporate suppliers, K International and Language Line, to bring this policy up to date.

From the year beginning 1 September 2013 to 31 August 2014, the IPCC used translation and interpretation services through our corporate suppliers, K International, on 80 occasions (excluding Welsh translations). Of these, 50 per cent were submitted by Casework and Customer Services staff; 42.5 per cent by Investigations staff; and 7.5 per cent by Hillsborough. Materials translated ranged from appeal letters and witness statements to reports and emails.

Figures 1, 2 and 3 show the different languages we have translated our materials into, on request, over the last three years.

Figure 1: 2010/11

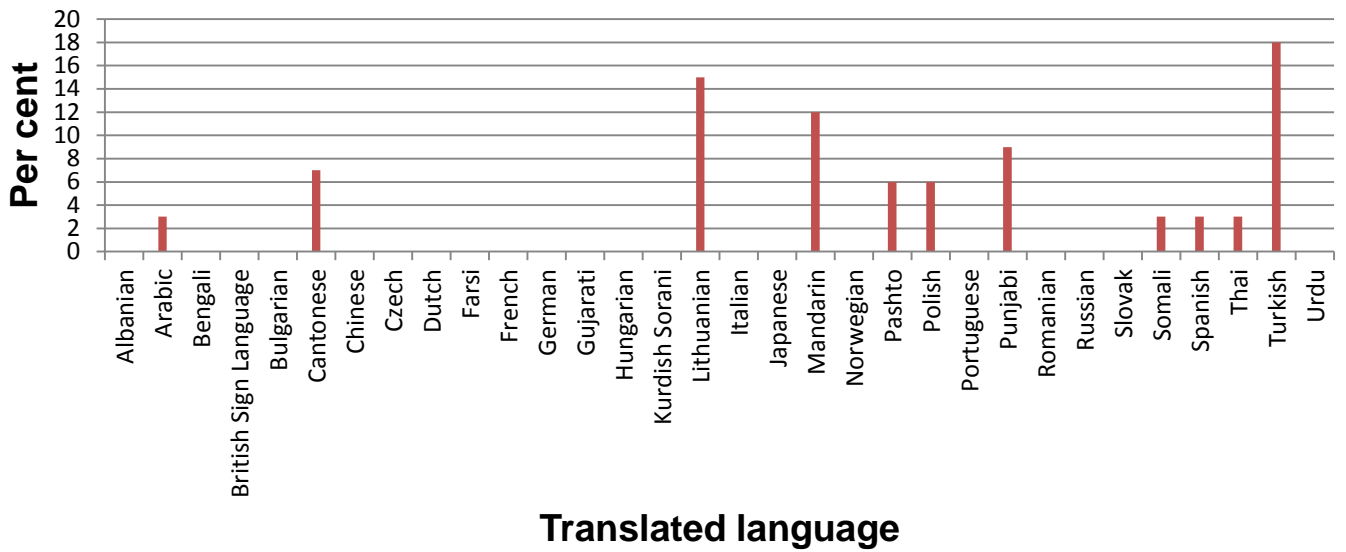
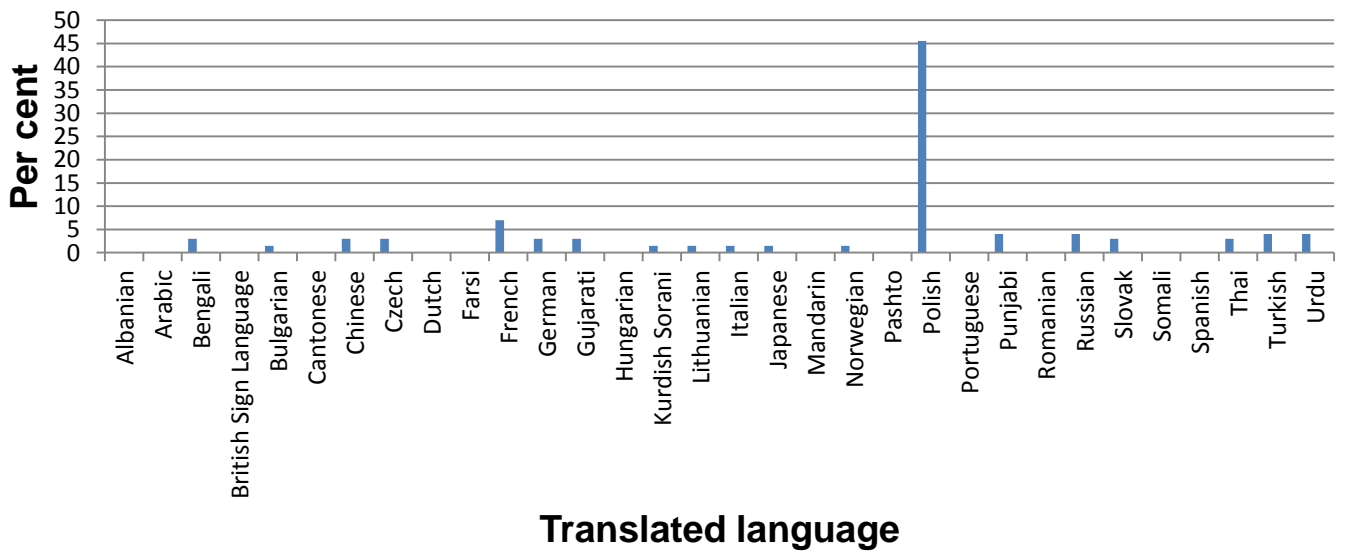
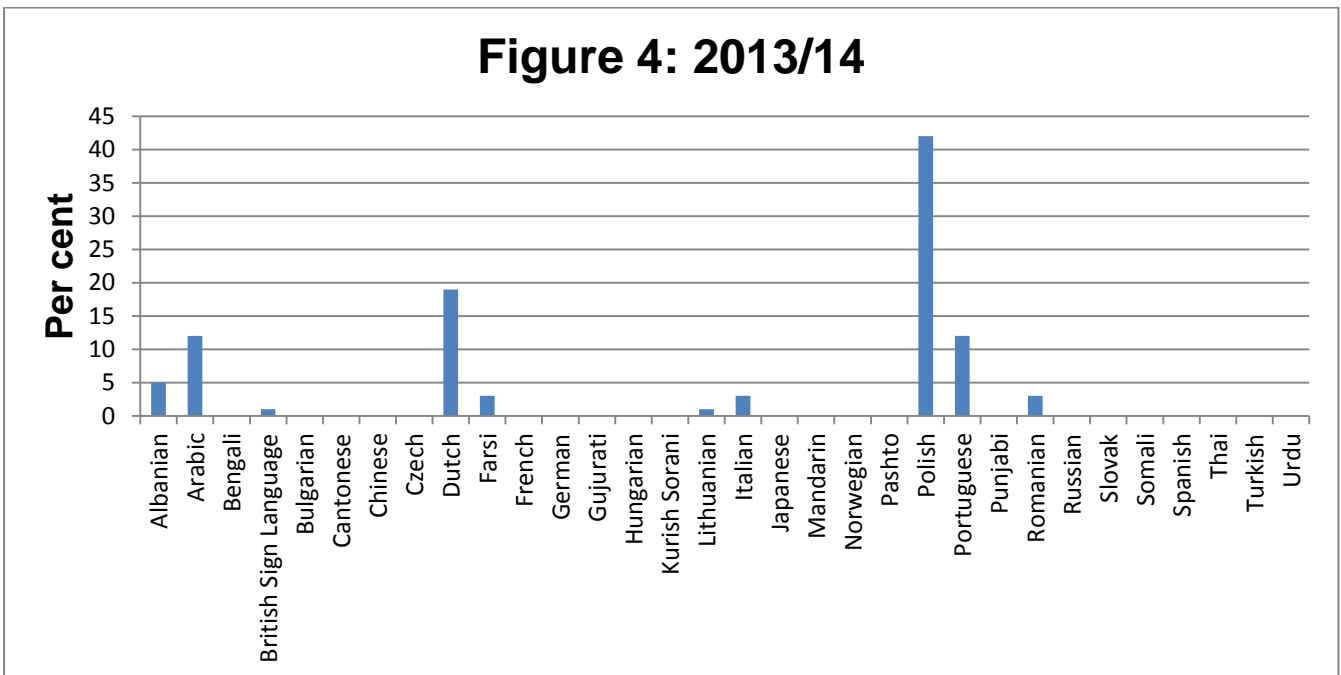
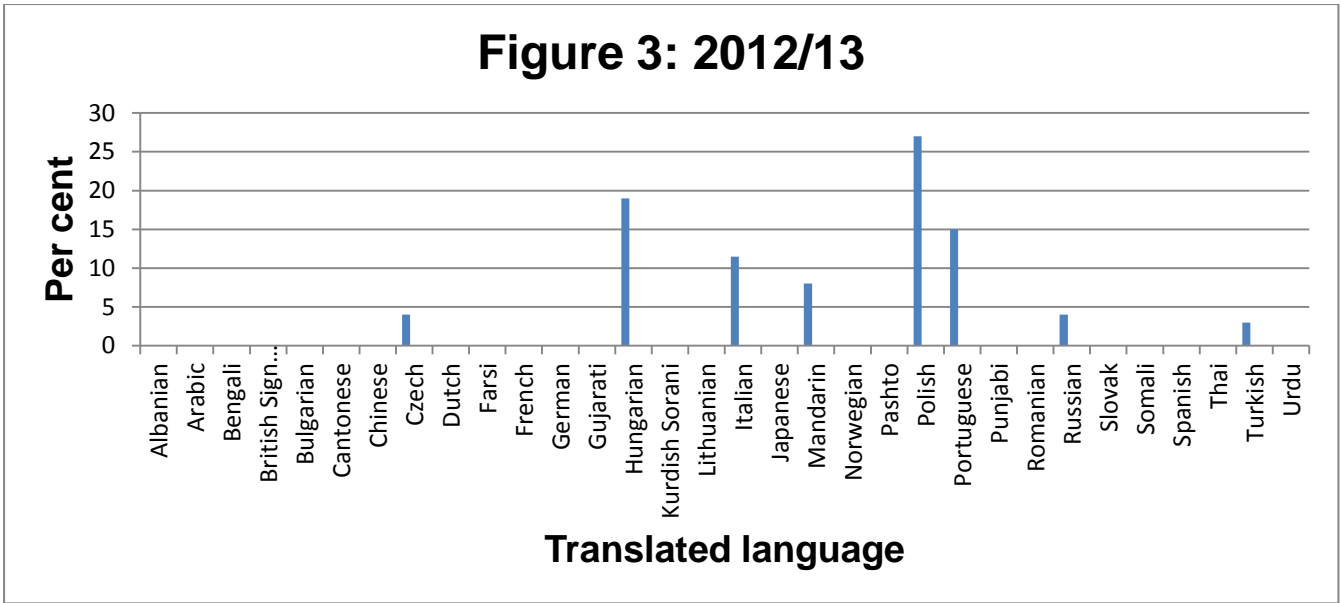


Figure 2: 2011/12





From the year beginning 1 September 2013 to 31 August 2014, the IPCC used telephone interpretation services through our corporate suppliers, Language Line, on 59 occasions (excluding Welsh translations). The breakdown of languages and percentage total is listed below:

Polish: 82.8%

Farsi: 3%

Romanian: 2.6%

Pashto: 2.6%

Punjabi: 2.1%

Urdu: 2%

Italian: 1.9%

Spanish: 1.7%

Hindi: 1.6%

Polish is consistently the most translated language across all our translation and interpretation services. The other most translated languages differ year on year.

With the most recent figures in mind, the list of languages some of our materials are translated into as standard (listed in section 2.3) is providing adequate coverage of languages. This also corresponds to the list of most commonly spoken languages in the Census 2011 (listed in section 2.2).

2.3.1 Future review of the translation and interpretation policy

We will conduct the next review of the translation and interpretation policy in conjunction with the review of our wider access strategy in 2015/16. If necessary, we will then update this policy to reflect any changes to our approach.

3. Translations and alternative formats

3.1 Standard translation

There is no legal reason for all the IPCC's documents to be translated. However, the public sector Equality Duty in the Equality Act 2010 recognises that *“public bodies should take a proportionate approach when complying with the Equality Duty... for example, a public body might decide to translate a leaflet about a key public service into a few commonly spoken minority languages, in order to ensure people from particular ethnic minority communities have access to the service. But translating all of its public information into the 300 languages regularly spoken in London would be a disproportionate response to the Equality Duty.”*¹

In line with this section of the Equality Act 2010, we take a common-sense approach to translating our information.

The IPCC translates only key corporate information aimed at members of the public, as standard. In particular, we make available in other languages information that provides people with access to the complaints system.

Our research has shown that the following ten languages (in addition to English and Welsh) are the ones most likely to be useful to our diverse audience:

- Arabic
- Bengali
- Chinese
- French
- Gujarati
- Polish
- Portuguese
- Punjabi
- Turkish
- Urdu

¹ Equality Act 2010: public sector equality duty: What do I need to know? A quick start guide for public sector organisations.

The following information is available in the above ten languages [on our website](#):

- How do I make a complaint?
- Appealing against a complaint not being recorded
- Appealing against local resolution
- Appealing about the police investigation into your complaint
- Appealing against the decision to disapply
- Appealing about the decision to discontinue an investigation
- Appealing about the outcome of a complaint after the decision to disapply
- Frequently asked questions about appeals

Where people do not have internet access they can contact the IPCC Customer Contact Centre, who will print off the relevant information and post it.

3.2 Translation requests

We will consider all requests for additional translations – i.e., into languages other than those listed above and/or translation of additional IPCC publications or information. If IPCC staff receive a request for a translated version of a document or publication they should contact the Corporate Communications team, who will decide whether this is feasible and, if so, arrange the translation².

While we will consider all requests for information to be made available in additional languages, our limited resources will be aimed at translating public-facing information which can be seen to increase access to the complaints system.

3.3 Translation/interpretation relating to a complaint or investigation

Where IPCC staff need to access translation or interpretation services in connection with a complaint or investigation, they should contact our translation supplier (see

² In dealing with complaints and investigations; casework, customer service, and investigations staff can arrange any necessary translation or interpretation by contacting our suppliers direct – see page 16.

page 16 for process to follow). Face-to-face translation and interpretation services for use in an IPCC investigation are usually accessed through the National Register of Public Service interpreters, the UK's independent voluntary regulator of professional interpreters specialising in the public sector (see page 17 for process to follow).

3.4 British Sign Language (BSL)

We also provide the information listed in section 4.1 in BSL video format [on our website](#). DVD versions of the BSL videos can be created on request.

Information in Braille is available on request.

3.5 Easy read

Easy read is an accessible format that can be helpful for people who are not fluent in English. It gives essential information about a topic without a lot of background information and uses pictures to support the meaning of the text.

We have worked with people who have learning disabilities to produce four documents in easy read format. We have published these on our [website](#):

About us

How to make a complaint

What do I do if I am not happy about the way my complaint was dealt with

Questions that people ask us a lot

4. Guidance for staff

The IPCC has a duty to provide access to the complaints system and to meet the needs of those using it as far as is possible. We want to ensure that people who wish to make a complaint can do so, no matter what their language.

4.1 Translating written complaints and correspondence

If someone wishes to make a complaint in a language other than English then we are obliged to accept the complaint – and communicate with the complainant in the language of their choice – unless there is a good reason why this is not possible. However, staff should use common sense to establish that foreign language contact is complaint-related before requesting a translation.

Online translation software can be a useful way of finding out about the general content of a communication before deciding whether to go ahead with a full translation. Staff who have language skills may be willing to use them in this capacity before an official translation is paid for (see section 5.5 for further information about IPCC staff using their language skills in the course of their work). Staff should seek advice from their line manager if they are in any doubt.

When necessary, staff will need to arrange translation of letters, complaint forms and other correspondence. Written contact from a customer in a language other than English should be referred to our translation supplier to supply an English version that we can then devise a response to.

When we have written a response to the customer, this should be sent off for translation into the language they made contact in (see Appendix 1 for the full process to be followed).

4.2 Telephone interpretation

Where customers wish to conduct a telephone conversation in a language other than English, we have established a facility with Language Line. Language Line operates 24 hours a day, seven days a week, 365 days of the year. It offers an interpretation service in 150 languages. To use the service, please call 0845 310 9900 or dial #3 and quote 'L41233' to access our account. See Appendix 1 for the process to follow.

4.3 Face-to-face interpreting

Where face-to-face interpreting is required (including BSL), this can be arranged by contacting one of our suppliers. Follow the good practice listed in Appendix 1.

4.4 Our translation and interpretation suppliers

Our supplier for **telephone translation** is Language Line (see contact details and instructions in Appendix 1).

For both **face-to-face** and **written** translation you can contact K International:

Gemma Lloyd

Tel: 01908 557938

Email: gemma.lloyd@k-international.com

Our supplier has undergone a rigorous procurement exercise to enable them to be added to the Home Office framework of approved suppliers. They have committed to observing our security and confidentiality policies and all documentation is produced according to ISO quality procedures.

Also, for **face-to-face** interpretation you can go to the National Register of Public Service Interpreters website - <http://www.nrpsi.co.uk>

Monitoring the service from our suppliers

It is important that we have the means to monitor the translation and interpretation services we receive and ensure that we are getting value for money. Please complete the [feedback form available on iNet](#) after using translation or interpretation services. Please email completed forms to ipcc.comms@ipcc.gsi.gov.uk.

4.5 Using relatives and friends, children or multilingual staff as translators or interpreters

Wherever possible, staff should make use of the professional translation and interpretation services provided by our approved contractor. Relatives and friends of complainants should not be used to interpret or translate information, nor should children under 18. The only exception to these principles is in incidents where there is a need to obtain basic information in an emergency situation.

Equally, the IPCC does not expect its own multilingual staff to use these skills in carrying out their daily work. However, there may be occasions when certain staff can use their language skills in the course of carrying out tasks that are part of their normal work – provided that they are happy to do so, and with the agreement of their line manager.

4.6 Casework and Customer Service templates

Staff in Casework and Customer Services are able to save translations on the directorate's sharepoint site:

<http://iteam.guardian.gov.uk/sites/CCSD/ccc/Page%20Library/Translation%20Page>.

[aspx?PageView=Shared&InitialTabId=Ribbon%2EWebPartPage&VisibilityContext=WSSTabPersistence](#)

Over time, a range of standard template letters will be saved onto the system and be available for reference and further use. Please refer to the sharepoint site to see whether a translated correspondence already exists in the language you are looking for.

Appendix 1: information for staff on dealing with translation and interpretation

Telephone interpretation

- Establish what language the caller speaks, their name and the telephone number they are calling from.

There are two ways to conduct the call:

- Keep the caller on hold and begin a three-way conference call with Language Line (instructions below).
- Ask the caller to hang up and explain they will get a call back in a few minutes. When you contact Language Line they will phone the caller for you and enable a three-way conference call between the interpreter, you and the complainant.

How to make a conference call:

- Press the 'more' option just below the screen of your phone. Several options will then be displayed on the screen.
- Select 'Confrn' (Conferencing). The caller will be placed on hold while you dial 0845 310 9900 or dial #3 to contact a Language Line operator.
- State which language you require interpreted.
- To enable a three-way conference call between you, the complainant or enquirer and the telephone interpreter, select Confrn. Selecting this option connects all three speakers.

Translation to and from English required in the course of dealing with general IPCC correspondence and investigations (letters, complaints, investigation reports, etc)

- complete a booking form and email to K International – please CC ipcc.comms@ipcc.gsi.gov.uk into the message
- K International will then get in touch with a quote for the translation required based on the word count of the copy to be translated
- seek authorisation for the expenditure from the relevant budget holder
- create a purchase order for the work and send the supplier the copy to be translated

- when supplying an electronic file to a complainant or family member (for example, providing a family with an investigation report), the file MUST be PDFed. Do not supply Word documents, as these can be altered

Face-to-face interpretation, including use of BSL (for example, where we need to arrange meetings with family members who do not speak English during an investigation)

Where face-to-face interpreting is required (including BSL), this can be arranged by contacting K International or by going to the National Register of Public Service Interpreters website.

To contact K International:

- complete a booking form and email to K International – please CC ipcc.comms@ipcc.gsi.gov.uk into the message
- K International will then get in touch with a quote
- seek authorisation for the expenditure from the relevant budget holder

To contact the National Register of Public Service Interpreters:

- Go to www.nrpsi.co.uk. The interpreters on the register are vetted to varying degrees and there is a search filter to identify security level, language requirements and availability by location. The Register is currently made up of the names of over 2,300 interpreters in 99 languages.
- Search the register by completing the appropriate fields. You will then be provided with a selection of interpreters which you can then choose from.
- Interpreters are paid on a self employed basis on provision of an invoice in the normal way.

You should remember the following good practice when making arrangements that include an interpreter, whether this is spoken language or BSL:

- **Before the meeting** caution should be exercised when interpreters used in the family liaison process, to ensure that gender, personal background or belief are not conflicting with the families.
- plan ahead and ensure that an adequate meeting space is booked
- make sure that any paperwork aimed at the service user has been translated into their language

- allow enough time to brief the interpreter before the meeting begins
- ensure that water is available
- consider the layout of the room – the interpreter will need to be able to clearly see and hear those involved in the meeting

During the meeting

- explain the role of everyone at the meeting
- explain what will happen during the meeting
- talk directly to the service user, speaking clearly and avoiding jargon, abbreviations and complex terms
- be sensitive to the demands placed on the interpreter
- ensure that the service user has understood what has been discussed

After the meeting

- provide the interpreter with any feedback

Statements requiring interpretation

Statements should be written in the witness's first language and retained as a statement. The statement should then be translated into English, and produced as an exhibit by the interpreter. Therefore for statements which have been translated, the following should be available:

- The original statement of the witness in their language
- A statement from the interpreter about the interview and the translation of the statement
- The translated statement, produced as an interpreter's exhibit
- A working copy of the exhibit for the case file

If you would like more information about using a translator or interpreter during and investigation, please contact the operations training and development team.

Requests for translated versions of any IPCC publication or form

- Refer the request to the Corporate Communications team, who will establish whether it is appropriate to go ahead and, if so, arrange the translation.

- We will also make these additional translations available on our website.

Appendix 2: feedback form for staff

Please complete and return this form to help us monitor how effective our suppliers and the overall translation and interpretation process are.

Did you request?

Translation

Face-to-face interpretation (including BSL)

Telephone interpretation

Was your request dealt with in a timely way?

Yes

No

In requests involving written translation, was the translation provided within the timescale you requested?

Yes

No

In requests involving face-to-face interpretation, did the interpreter arrive on time and act in a professional manner?

Yes

No

Did the service user involved in the translation/interpretation provide any comments on the quality of the translation/interpretation?

Yes – positive feedback received

Yes – negative feedback received

No comments received

Describe your overall experience of dealing with K International/Language Line

Please email completed feedback forms to: ipcc.comms@ipcc.gsi.gov.uk