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DWP policy on interpreting services for customers

Equality Impact Assessment
January 2011

Equality impact assessment for DWP policy on interpreting services for customers

Introduction

The Department for Work and Pensions has carried out an equality impact assessment on the way it provides interpreting services for its customers, assessing the proposal in line with the current public sector equality duties.

This process will help to ensure that:

- the Department's strategies, policies and services are free from discrimination;
- the Department complies with current equality legislation;
- due regard is given to equality in decision making and subsequent processes; and
- opportunities for promoting equality are identified.

Providing interpreting services for DWP customers

The Department for Work and Pensions is committed to providing the best possible services to meet the diverse requirements of all its customers including:

- jobseekers;
- disabled people;
- lone parents;
- carers;
- pensioners; and
- people in work.

In order to provide all our customers with a service which meets their needs we offer a range of ways to communicate with us and to obtain information from us. These include:

- face to face meetings
- telephone conversations;
- via the internet; and
- through leaflets and forms.

To make sure that we can communicate with all groups, including disabled people and individuals who do not speak English as a first language, we provide, for example:

- induction loops and textphones for people who have difficulty hearing or speaking; and
- language interpreters, including British Sign Language interpreters.

Our interpreting services

DWP provides an interpreter when we need to communicate with a customer who:

- can't communicate adequately in English (or, in Wales, Welsh) and;
- can't, or doesn't want to, provide their own interpreter.

There are three main ways we provide customers with interpreting services. These are:

- using our own staff;
- through our contracted telephone interpreting service supplier; and/or
- through face to face interpreters.

Own staff

To make sure that our people are recognised for providing interpreting services we have a Language Allowance Policy. Our employees are entitled to claim a full rate of Language Allowance if they are:

- in certain grades, Bands A to C/Grade AA to EO, which are our administration and advisory grades and made up of primarily those who provide the majority of our front line services, for example advice to jobseekers or pensioners; and
- use a foreign language for at least 25% of their time in the course of carrying out their normal duties; and/or
- use British Sign Language on average four times or more each month.

Staff may also be entitled to a reserve rate if their name is on a retainer list and they are called upon to use their language skills to cover for absences. Language Allowance is paid to those eligible staff on a monthly basis as part of their salary. There are approximately 400 staff across DWP who are in receipt of a Language Allowance. Of these around 120 receive the full rate, with the rest receiving the reserve rate.

Managers are responsible for verifying and authorising payment of the Language Allowance to our employees for their services. They receive full guidance on our policies to make sure that this process is fair for all employees and also that customers receive the best possible service. Before authorising payment to our employees, managers must be content that the employee demonstrates a satisfactory knowledge and command of the

language concerned. They must also check that the employee's application for payment matches their assessment of usage, querying any differences.

Contracted telephone interpreting service

We supply interpreters through our contracted telephone interpreting service supplier. Our current contracted supplier (thebigword) receives between 16,500 and 22,000 calls each month to provide telephone interpreting services.

Face to face interpreting

Our face to face services are provided occasionally through our own employees or, either from community based voluntary interpreting services, community based local services (paid for) or external suppliers who are contracted to provide these services; Our current contracted external providers include, Wessex, Prestige and thebigword and handle over 13,000 bookings per year.

Proposed changes to our interpreting services

The Department is making changes to how it supplies its interpreting services to improve both value for money and its customer service.

The overall principles for providing interpreters remain the same in that DWP will still provide an interpreter when we need to communicate with a customer who:

- can't communicate adequately in English (or, in Wales, Welsh) and;
- can't, or doesn't want to, provide their own interpreter.

The key change we are making is to reduce the number of face to face interpreters used, replacing them with telephone interpreting.

Telephone interpreting is the most cost-effective option in the great majority of circumstances. Interpreters are available on the phone within 60 seconds for 90% of our transactions and do not have to be pre-booked. They currently meet over 99% of these requests.

However there will be a number of situations where face to face interpreters will continue to be used including:

- fraud interviews;
- where a customer is deaf or hard of hearing and who needs to communicate with someone using British Sign Language (BSL) or similar communicator support; and
- any customers identified as being vulnerable, as needing a reasonable adjustment, or who would be disadvantaged by not providing a face to face interpreter. Guidance is provided for our staff on reasonable adjustments and deciding if customers are vulnerable.

The second change is where face to face interpreting is needed, the Department's contracted suppliers must be used unless cost-free community interpreters are normally used and available. There will no longer be the option to use community based services that require a fee. Using suppliers that have not been contracted for is more costly and DWP cannot guarantee the quality of the supplier. However, for BSL interpreters, local arrangements can continue where this offers value for money and/or a relationship has been established with the interpreter. Local commercial services amount to around 15,000 transactions per year.

Consultation and involvement

DWP has set up a customer reference group to help to gather views from our customers on our policies and services. We invited stakeholders to participate in the reference group. Meetings are held every six months and involve a number of external organisations such as:

- Disability Awareness In Action;
- UK Council on Deafness;
- RNID;
- Action for Blind People; and
- National Advisory Group on Learning Disability and Ethnicity.

As there is no reduction in the level of service provided to customers, it has not been necessary to undertake additional consultation with customer representative groups with regard to the changes.

Our approach has been to inform those stakeholders about the service improvements that have been and will continue to be made.

Internally we have a Language Policy Group who meet quarterly and which is made up of internal stakeholders and whose purpose is to:

- work with our contracting teams to develop future service specification;
- provide a quality assurance role when reviews are made of the language related policies;
- obtain information about interpreting and written translation problems from our businesses and
- share good practice and information about interpreting initiatives.

We have engaged with a range of stakeholders in the DWP businesses responsible for implementing these changes, including Pension, Disability and

Carers Service, Jobcentre Plus, Debt Management Services, Corporate Communications and Commercial Directorate. The required Equality, Operational and Health and Safety impacts have been conducted to ensure that the changes are feasible and managed in effectively, and to ensure that the way services are organised does not create any disadvantage for any groups of customers.

Impact of the updated interpreting policy

Race equality impact

Our policy is to provide an interpreter where we need to communicate with a customer who:

- can't communicate adequately in English (or, in Wales, Welsh), and
- can't, or doesn't want to, provide their own interpreter.

Whilst our proposal will reduce the number of face to face interpreters used for people who cannot communicate adequately in English it will not reduce the overall service to these customers. Individuals will still have access to interpreting services through either community based (voluntary) services, via our staff or through our telephony service.

In addition there is a limited number of circumstances where the telephone service is unsuitable or would create disadvantage (for example, for vulnerable customers or where a reasonable adjustment is needed). Face to face interpreting services remain available in all our offices which are open to the public, and in circumstances where home visits are required.

We will also continue to supply community based voluntary services which are accredited and free of charge. However a reduction in the usage of community based providers that charge for services may have an impact on local providers which may employ a number of ethnic minority staff to provide services.

We provide interpreting services for over 140 different languages.

Disability equality impact

We provide services to help meet the needs of disabled people when accessing our services. We provide British Sign Language interpreters either through our contracted suppliers, from which there are three to choose, or through our own employees trained in using British Sign Language.

However, despite providing these services and facilities which are widely used, the Department has previously been criticised for not providing access to face to face interpreting services quickly enough.

A shortfall exists because there is a limited number of qualified British Sign Language interpreters available within the UK, which means their services are in great demand. Those that are available not only provide British Sign Language services for DWP, they also provide services to other government departments and to private sector organisations.

The Cabinet Office is putting measures in place to secure new cross-government contracts for interpreting services, including providing additional British Sign Language interpreters. The new contracts are expected to be in place by Spring 2011. This will better help us to meet the needs of our customers, eliminate the risk of discrimination and promote equality of opportunity.

Additionally DWP continues to provide a face to face service for vulnerable customers, and where a reasonable adjustment is required for a customer who has a disability which prevents them using the telephone. For example, if they have mental health issues or learning difficulties.

If a staff member has difficulty communicating with customers and/or interpreter via telephone interpreting, due to a disability, a reasonable adjustment will allow them to use face to face interpreters as an alternative.

Gender and Gender Reassignment equality impact

There is no gender impact in terms of the policy itself or how this is delivered to our customers. Interpreting services are available to all customers irrespective of their gender

Other equality impacts

There is no risk of discrimination on the ground of age, sexual orientation, religion or belief or pregnancy or maternity. Interpreting services are available to all customers irrespective of these grounds.

Overall impact

The change proposes providing the majority of our interpreting services via our telephone interpreting contract and should not result in a negative or disproportionate impact on any group or individual. Our staff will decide whether the telephone service will meet the needs of the business and the customer. If a telephone interpreting transaction is inappropriate, because the customer is considered to be vulnerable or the business transaction is one that falls within a predefined set of circumstances, then a face-to-face interpreter service will be offered to deliver the required service to the customer and achieve the necessary business outcome.

In many circumstances the telephone interpreting service will help to offer an improved service, given it is immediately available and does not have to be pre-booked.

Monitoring and evaluation

The policy will be monitored through several methods. We currently receive data from our contractors on:

- total number of calls in month;
- total number of minutes in month;
- average call duration in month;
- percentage of all calls serviced in month;
- average connection time in month;
- service availability in month;
- number of Interpreters based in UK;
- number of teleconferencing calls made in month were made during October, a decrease from September when 140 calls were made;
- top 15 languages used in month;
- performance and quality of interpreters;
- summary of Issues Raised and measures taken to rectify issues; and
- number of calls undertaken in the difference languages plus duration of calls.

The management information from the providers allows us to monitor the quality of service provided to customers and also any issues that customers raise. This is not broken down into ethnicity groups but the types of languages being accessed provides robust data on the types of ethnic groups we are predominantly dealing with.

In addition we monitor our financial records to check for numbers of face to face interviews conducted against telephone interviews conducted. We also have a formal complaints procedure which people can use and which is monitored to make sure that services are accessible to all.

Next steps

The EIA will be reviewed in 12 months when data has been sufficiently analysed to determine impact.

Contact details

Diversity and Equality CoE