**Translator and Interpreter Policy**

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# Introduction

## Policy statement

There will be occasions when patients who attend Sheerwater Health Centre will require the services of an [interpreter and/or a translator](https://www.foreigntongues.co.uk/the-main-differences-between-a-translator-and-an-interpreter) and they may fall into the following categories:

1. Patients for whom English may not be their first spoken language and who have difficulty in communicating
2. Those who communicate using sign language
3. Patients who return home from overseas having previously needed to rely upon that nation’s healthcare facilities

For the purposes of this policy, an interpreter is someone who translates speech orally or into sign language whereas a translator is a person who will translate written text from one language into another.

The NHS is committed to providing high quality, equitable, effective healthcare services which are responsive to all patients’ needs. The NHS England (NHSE) document titled [Guidance for commissioners: Interpreting and Translating Services in Primary Care](https://www.england.nhs.uk/wp-content/uploads/2018/09/guidance-for-commissioners-interpreting-and-translation-services-in-primary-care.pdf) states that patients should be able to access primary care services in a way that ensures their language and communication requirements do not prevent them from receiving the same quality of healthcare as others.

This guidance outlines that the responsibility for commissioning interpreter and translator services lies with the Integrated Care Board (ICB). Furthermore, it provides information on how all those working at this organisation adhere to the requirements of NHSE’s [Accessible Information Standard (AIS)](https://www.england.nhs.uk/ourwork/accessibleinfo/).

There is an expectation from the CQC that these services will be available and provided in general practice in support with [CQC GP Mythbuster 20: Making information accessible](https://www.cqc.org.uk/guidance-providers/gps/nigels-surgery-20-making-information-accessible). Supporting information can also be found in both the [Accessible Information Standard Policy](https://practiceindex.co.uk/gp/forum/resources/accessible-information-standard-policy.1361/) and the [Deaf Patient Access Policy](https://practiceindex.co.uk/gp/forum/resources/deaf-patient-access-policy.1180/).

[Accessible Information Standard](https://practiceindex.co.uk/gp/solutions/learning/accessible-information-standard/) eLearning is available in the e-learning platform, Blue Stream Academy.

## Status

The organisation aims to design and implement policies and procedures that meet the diverse needs of its service and workforce, ensuring that none are placed at a disadvantage over others, in accordance with the [Equality Act 2010](https://www.legislation.gov.uk/ukpga/2010/15/contents/enacted). Consideration has been given to the impact this policy might have regarding the individual protected characteristics of those to whom it applies.

This document and any procedures contained within it are non-contractual and may be modified or withdrawn at any time. For the avoidance of doubt, it does not form part of your contract of employment. Furthermore, this document applies to all employees of the organisation and other individuals performing functions in relation to the practice such as agency workers, locums and contractors.

# Policy

## Outline

In its [guidance](https://www.england.nhs.uk/wp-content/uploads/2018/09/guidance-for-commissioners-interpreting-and-translation-services-in-primary-care.pdf), NHSE outlines what is reasonable under the Equality Act 2010 in the AIS to ensure that patients can receive the necessary support to enable them to communicate effectively with health services.

Since July 2016, NHS funded providers must, by law:

* Identify patients by asking them if they have any information or communication needs and find out how these can be met
* Record these needs in a clear and consistent way on the patient’s clinical record
* Record what the patient’s information or communication needs are on their clinical record and how these will be met
* Following consent having been given, share with other health and social care providers both the information and communication needs of any patient

When undertaking an inspection, the CQC will look at how organisations are meeting the AIS obligations. It is important to make the distinction between:

* People who have a disability which makes communicating in spoken and/or written English difficult or impossible, and
* People whose first language is not English

Within the Equality Act 2010, there are extra requirements to make reasonable adjustments for disabled people. This means that interpreting and providing written information in alternative formats is likely to be a legal requirement for GP organisations, for example, large print on request. Organisations can consider the ‘reasonability’ of each case. There is no reasonable adjustments requirement for interpreting and translation because of race or nationality. The Equality Act does not specifically mention people whose first language is not English.

The General Medical Council’s [Good Medical Practice 2013](http://www.gmc-uk.org/guidance/good_medical_practice.asp) states that “You should make sure that arrangements are made, wherever possible, to meet patients’ language and communication needs”.

## Principles for high quality services

NHSE lists eight principles for high quality interpreting and translation services that can be used to help to agree priorities and ambitions for improving these within an organisation’s catchment areas.

Primary care organisations must read the guidance in detail to ensure that they fully understand and comply with their responsibilities as defined within Principles 1 to 7 whereas Principle 8, quality assurance and continuous improvement, is the responsibility of the ICB. Further reading of the QA requirements can be found at Annex 1 to the NHSE guidance document.

The eight principles are:

|  |  |
| --- | --- |
| **Principles** | |
| 1 | Access to service |
| 2 | Booking of interpreters |
| 3 | Timeliness of access |
| 4 | Personalised approach |
| 5 | Professionalism and safeguarding |
| 6 | Compliments, comments, concerns and complaints |
| 7 | Translation of documents |
| 8 | Quality assurance and continuous improvement |

## Interpreter services

As soon as the requirement for an interpreter is known, the member of staff requesting the service is to contact The Big Word on 0333 344 9473 and, when requested, provide our access code 77744123 when following the instructions.

Deaf patients can make use of the [SignVideo](https://interpreternow.co.uk/) app to access the services of a qualified BSL interpreter. Further information can be found in [Section 2.5.](#_Useful_resources)

## Translation services

The following process is to be undertaken for translation services:

* Patients may produce medical records that require translating. This may be for a patient who has recently arrived in this country, or one returning from holiday when they needed to seek the services of a foreign healthcare provider
* Upon receipt of such documents, the originals are to be scanned into the patient’s clinical record and returned to the patient
* The members of staff responsible for having the medical record translated are to contact The Big Word requesting that this is undertaken at the earliest possible opportunity
* When the translated version of the clinical record is received, it is to be summarised and scanned into the patient’s record in accordance with the organisation’s procedures

## Useful resources

The following resources are available to support the understanding and benefits of both translation and interpretation services:

* NHS 111 British [Sign Language](https://www.youtube.com/watch?v=4O0js0832Ng) Service (BSL) outlines the relay service which 111 utilises
* The [SignVideo](https://interpreternow.co.uk/) app offers deaf people video access to qualified BSL interpreters so that they can communicate with hearing people at anytime and anywhere in the UK. The app is available for all devices [here](https://signvideo.co.uk/download/)
* The Parliamentary and Health Service Ombudsman has produced a [YouTube video](https://www.youtube.com/watch?v=hYhlvUQRPaY) that outlines the case of a deaf patient who was denied access to a British Sign Language interpreter
* NHS 111 British Sign Language Service Case Study [Collette’s Story](https://www.youtube.com/watch?v=ThsV80TcHWU)
* Commanding Hands have produced several video clips:
* [Basic Sign Language](https://www.youtube.com/watch?v=EcgJW26oMAU) to use while wearing a face mask
* [Health and Medical Terminology](https://www.youtube.com/watch?v=07KG48ADhO8) in British Sign Language
* [100 Basic Signs](https://www.youtube.com/watch?v=gMNHvXSW4iE) in British Sign Language (BSL)
* [Another 100 Basic Signs](https://www.youtube.com/watch?v=zkUSXiNU66s) in British Sign Language (BSL)

# Supporting information in different languages

## CQC expectations

The CQC advises in [CQC GP Mythbuster 20](https://www.cqc.org.uk/guidance-providers/gps/nigels-surgery-20-making-information-accessible) that it expects all GP practices to ensure that services are to be responsive to the needs of the population.

This does not always mean that the CQC would expect all GP organisations to have information leaflets in multiple languages. The key point is that services should be responsive to the needs of the population they serve that will vary between practices, although each organisation should be aware of the needs of the people on its patient list.

This organisation is to consider how it provides information about its services. This might mean making printed information available in different languages. It may also mean making sure people who use interpretation and translation services and those close to them can access these.

## Supporting information

The following posters are available to support translation and interpreter services:

* [Translation services poster](https://practiceindex.co.uk/gp/forum/resources/translation-services-poster.1850/)
* [British Sign Language interpreter](https://practiceindex.co.uk/gp/forum/resources/poster-on-bsl-interpreters.1645/?fromcat=75)