

HDC Due Regard (Equality Analysis)

Due Regard (Equality Analysis) is an on-going proactive process which requires us to consider the effect our decisions are likely to have on local communities, service users and employees, particularly those most vulnerable and at risk of disadvantage.

This template has been designed to assist in the collation of information and evidence required to support the 'Due Regard' process when introducing new policies/procedures/functions and services or reviewing existing ones.

Name of policy/procedure/function/service being analysed: Usage of British Sign Language (BSL) interpretation at Council Meetings

Department and section: Democratic Services

Name of lead officer: Verina Wenham

Other people involved (assisting or reviewing – including any service users or stakeholder groups etc.): Julie Clarke

Date assessment completed: September 2021

Step 1: Defining the policy/procedure/function/service

Is this a new, amended or reviewed policy? What are the aims, objectives and purpose and how will they be achieved? What are the main activities and which communities are likely to be affected by these activities? What are the expected outcomes?

The aim of the report is to consider the usage of British Sign Language (BSL) interpretation at virtual Council Meetings to improve accessibility to the democratic process for residents of the district who are deaf or have hearing loss.

Step 2: Data collection & evidence

What relevant evidence, research, data and other information do you have and is there any further research, data or evidence you need to fill any gaps in your understanding of the potential or known effects of the policy on different communities? Include quantitative data as well as qualitative intelligence such as community input and advice.

Census 2011 statistics show that of the 85382 residents of the Harborough District, 26 residents (aged 3 and over) used sign language as their main language. 17 of these used British Sign Language (BSL) as their main language, the remaining 9 used other forms of sign language/communication. Statistics do not show the age breakdown of BSL users within the district other than that they are aged over 3 years old. Evidence shows that people who become Deaf or deafened later in life do not go on to learn BSL. Some, but not all people, who use BSL as their main/preferred language can read but literacy levels tend to be lower compared to the level of those people who have no hearing loss.

RNID statistics show that 1 in 5 adults in the UK are deaf or have hearing loss. Using 2011 population statistics for residents aged over 18 (66,733) that would mean that 13,347 of our adult residents had some level of hearing loss. The incidence of hearing loss increases with age – 41.7% of people over 50 have hearing loss, 71.1% of over 70's and 90% of over 80's (RNID) but there are also residents of

the district aged under 18 who also have hearing loss and need to be taken into account when considering access to the democratic process via council meetings.

Hearing loss statistics are not broken down by ethnicity, but statistics show that access to public services for people with hearing loss who are not from a white background is even more difficult. Some of the reasons for this are raised in The Deaf Children's Society review – [Deaf children from ethnic minority groups](#). Therefore, access to information in other languages is a very important consideration for people with hearing loss from communities where English is not their main language. Census 2011 statistics show that the top 10 main languages, other than English, spoken by residents aged 3 and over within the district were: (residents who used BSL as their main language came joint 22nd on the main language list)

1. Polish (230 residents)
2. Gujarati (228 residents)
3. Punjabi (126 residents)
4. French (48 residents)
5. Spanish (46 residents)
6. German (45 residents)
7. Vietnamese (43 residents)
8. Bulgarian (41 residents)
9. Portuguese (40 residents)
- 10=. Hungarian (39 residents)
- 10=. Urdu (39 residents)

Approximate costs of provision of a sign language interpreter (2019):

Action Deafness - Minimum 2 hour call out charge, charges are inclusive of travel, Normal hours Mon-Fri, 8am-6pm = £110 for 2 hours and £55 per hour after that, Out of hours 6pm–8am and weekends and bank hols = £130 for 2 hours and £65 per hour after that

iNet (Interpreter Network) - Minimum 2 hour call out charge. Mileage is charged on all journeys at 45 pence per mile and car parking.

Normal Hours Mon-Fri, 8am-6pm = £75 for 2 hours and £37.50 per hour after that Out of hours 6pm–8am and weekends and bank hols = £112.50 for 2 hours and £56.25 per hour after that

As most council meetings do not start until after office hours the minimum cost of providing BSL interpretation at each Council meeting would be approximately £225. There are on average 4 or 5 publicly accessible meetings a month which would mean a cost of £900 to £1125 a month.

Subtitles could potentially be provided at no cost as Council meetings are hosted via Microsoft Teams and they have recently turned-on software that would enable the use of subtitles for external meetings. English could be selected along with a selection of other relevant languages of our choice.

Step 3: Consultation and involvement

Have you consulted and if so outline what you did and who you consulted with and why.

Portfolio holder and Equality and Diversity Officer to ascertain facts and figures for the district residents

Step 4: Potential impact

Considering the evidence from the data collection and feedback from consultation, which communities will be affected and what barriers may these individuals or groups face in relation to Age, Disability, Gender Reassignment, Marriage and Civil Partnership, Pregnancy and Maternity, Race, Religion or Belief, Sex, Sexual Orientation, Other groups e.g. rural isolation, deprivation, health inequality, carers, asylum seeker and refugee communities, looked after children, current and ex-armed forces personnel (Veterans), deprived or disadvantaged communities and also the potential impact on Community Cohesion. Remember people have multiple characteristics so the impact of a policy on a particular community may impact people within the community differently. Where possible include numbers likely to be affected.

Providing a BSL interpreter for all council meetings would potentially provide a benefit for 17 residents of the district who could then access the democratic process in their preferred format. However, some of these residents would also be able to benefit from the provision of good quality subtitles.

Providing good quality subtitles for all council meetings would potentially improve access for over 13,347 adults and young people who have hearing loss within our district but who are unable to understand BSL.

Subtitles could also be provided in additional languages which, as well as assisting people with hearing loss who use another language as their main language, would also improve access for all residents who use that language. The impact of this could be increased engagement with the democratic process from residents who have been unable to easily access information in their preferred format before.

As the incidence of hearing loss increases with age then the impact of using subtitles would positively impact our older community the most. If subtitles were also available in other languages it would also positively benefit residents whose main language is not English, whether or not they have hearing loss.

Step 5: Mitigating and assessing the impact

If you consider there to be actual or potential adverse impact or discrimination, please outline this below. State whether it is justifiable or legitimate and give reasons. If you have identified adverse impact or discrimination that is illegal, you are required to take action to remedy this immediately. If you have identified adverse impact or discrimination that is justifiable or legitimate, you will need to consider what actions can be taken to mitigate its effect on those groups of people. Consider what barriers you can remove, whether reasonable adjustments may be necessary and how any unmet needs have identified can be addressed.

By considering options to improve access to the democratic process for people who are deaf or have hearing loss within the district we have also identified a potential improvement which could be made for people whose main language is not English.

Step 6: Making a decision

Summarise your findings and give an overview of whether the policy will meet Harborough District Council's responsibilities in relation to equality, diversity and human rights. Does it contribute to the achievement of the three aims of the Public Sector Equality Duty – eliminate unlawful discrimination, harassment, victimisation; advance equality of opportunity and foster good relations?

From the statistics we hold, the cost of providing BSL interpretation for all council meetings is not proportionate to the benefit which may be achieved. Far more beneficial would be the provision of good quality subtitles in a selection of languages, namely the top 5 languages spoken within the district.

Consideration could still be given to providing BSL interpretation at larger council meetings or meetings where major decisions are being made. Also, BSL translation services should be considered at the request of any resident who wishes to access meetings on an ad hoc basis or regular basis.

Step 7: Monitoring, evaluation & review of your policy/procedure/service change

What monitoring systems will you put in place to promote equality of opportunity, monitor impact and effectiveness and make positive improvements? How frequently will monitoring take place and who will be responsible?

Requests for translation services, with regard to democratic services, will be monitored as well as feedback following implementation of subtitled meetings. Once Census 21 statistics are released figures should be updated and languages can be reviewed as necessary.

Equality Improvement Plan

Equality Objective :

Action: Feedback from residents in relation to translation relating to democratic services to be monitored

Officer Responsible: ???

By when: April 2022

Equality Objective :

Action: Census 2021 language statistics reviewed when released

Officer Responsible: ???

By when: December 2022

Signed off by:

Date:

Once signed off, please forward a copy for publication to Julie Clarke, Equality and Diversity Officer
e-mail: j.clarke@harborough.gov.uk , telephone: 01858 821070.