



Equal Opportunity & Diversity Policy

> Statement of Intent

SIS aims to provide Community Interpreting services to meet the appropriate communication needs of all clients. We believe clients have the right to equality of access to public services and to informed consent.

SIS will ensure that services are provided on an equal basis, and without discrimination, regardless of the ethnic origin, culture, religion or belief, gender or gender reassignment, marital or civil partnership status, sexual orientation, age, pregnancy, disability or health status of the client.

SIS will ensure that no job applicant, employee, sessional worker, member or trustee receives less favourable treatment on the grounds of ethnic origin, culture, religion or belief, gender or gender reassignment, marital or civil partnership status, sexual orientation, age, pregnancy, disability or health status.

SIS is committed to managing and celebrating diversity. We wish to be inclusive and appreciate the value of people from every community bringing different ideas, experiences and skills to contribute towards innovation and improvement in service delivery.

Statement of values

➤ SIS believes in;

1. *Inclusiveness* - SIS values the linguistic and cultural diversity of our society and communities and strives to be inclusive in all aspects of our work.
2. *Rights* - SIS believes in the right of every individual to be treated with respect and to equality of access to services.
3. *Community* - SIS prizes its contribution to strengthening multicultural communities and promotes community interpreting and translating as keys to cultural understanding.
4. *Learning* - SIS understands that feedback, development and innovation are crucial to learning and service improvement.
5. *Participation* - SIS believes that services are strengthened when stakeholders are offered opportunities to participate and collaborate and that this will be the key to the way we work.
6. *Accountability* - SIS wishes to be accountable through the involvement of our trustees, members and communities.

> Objectives

To ensure that sessional workers, employees, management committee members and service clients do not experience unfair or unlawful discrimination.

To ensure that sessional workers, employees and management committee members understand and appreciate the forms and effects of discrimination. To be particularly mindful of the vulnerable situation of many asylum seekers and refugees.

To promote the definition of racism formulated by the MacPherson Report into the death of Stephen Lawrence;

“A racist incident is any incident which is perceived to be racist by the victim or any other person. It may be perpetrated against individuals on the basis of their race, colour, nationality, culture, language or religion”. (Recommendation 12)

To support the definition of racial harassment formulated by the Brighton & Hove Racial Harassment Forum;

“Racial harassment is defined as verbal or physical violence and/or behaviour towards individuals or groups on grounds of their colour, race, ethnic or national origin, religion or culture where the aggrieved believe the aggression was racially motivated, and/or there is evidence of racial motivation. Racial harassment includes attacks on property as well as people”.

To advocate equal opportunities policies by stating that a group will only be considered for membership if it has a policy, or is in the process of developing one.

To increase membership from people who face discrimination and, where relevant, from organisations representing people who face discrimination.

To seek to ensure that the composition of the management committee reflects the experience of the population who are eligible to use the organisation.

To take action to increase the number of employees from minority groups, especially in senior positions and in posts which have access to the decision making process.

To establish better links with groups experiencing discrimination.

To increase awareness within the organisation of the needs of groups which experience discrimination in order to provide more relevant services.

To review and adapt services to meet the needs of people facing discrimination.

To introduce an equal opportunities dimension in all areas of current and proposed work and service provision.

To provide a culturally sensitive office environment.

> **Procedures for Implementation**

Service Delivery

Sussex Interpreting Services (SIS) works with a wide diversity of clients, from many different linguistic, ethnic, cultural, religious and other backgrounds. In 2006 SIS clients speak over 60 languages. Many clients are Asylum Seekers and Refugees who have suffered trauma, mass violence and torture in their country of origin and live in poverty and insecurity in the UK.

SIS is committed to securing equitable access to services for every client. SIS aims to improve the quality of these services by encouraging a more sensitive response to SIS clients who cannot communicate effectively in English and who will have different cultural needs.

SIS will deliver this by providing Community Interpreting services based on a client-centred model that ensures maximum meaningful communication in both directions to ensure informed client choice. SIS will strive to support this with Community Translating and Community Advocacy services.

This model will be quality assured through a comprehensive programme of accredited training for sessional workers. All active core language Community Interpreters would show evidence of completion of the Open College Network accredited training programme *Community Interpreting-Essential Skills & Knowledge* and attendance at annual refresher training.

In each of the core languages there will be a minimum of 1 female and 1 male Community Interpreter who is active, living in Sussex and accredited to Level 3 in both Community Interpreting Skills and Bilingual Glossary for Public Services. In Arabic SIS will have a minimum of 2 male and 2 female Community Interpreters accredited and active at Level 3.

SIS will ensure that Community Interpreters operate within a clear Equal Opportunity Policy to provide a culturally sensitive and linguistically appropriate service. Day 4 of the 10 day accredited programme specifically address recognising and challenging discrimination. There is a particular focus on racism. Day 5 and 6 focuses on working cross-culturally, cultural mediation and the role of Community Interpreters in providing factual cultural information.

Clients

SIS will operate an open access policy with a 24 hour answer phone so that client's can easily self-refer using their first language.

Individual and community confidence in our services is underpinned by a clear commitment to confidentiality. The Contract for Services and Code of Practice contain minimum standards regarding confidentiality. All breaches of these standards will be dealt with swiftly.

SIS will maintain links with complimentary language services to ensure that SIS services are as inclusive and responsive to changing local language need as possible.

SIS will aim to supply all core language clients with translated information on how to self refer and, where appropriate, the Client Complaint Policy . A translated summary of the SIS Annual Report will be made available on request.

Freelance Sessional Community Interpreters

SIS will work hard to establish and maintain a collaborative dialogue with Community Interpreters through meetings, the SIS Bulletin, a groupsite and an Annual General Meeting. SIS aims to support Community Interpreters and provide feedback for active core language Community Interpreters.

SIS will operate a clear recruitment procedure which will assess potential Community Interpreters against a person specification, which includes; understanding and empathy with clients and their culture, knowledge of client rights and equal opportunities, an ability to use appropriate assertiveness skills and an appreciation of confidentiality and impartiality.

Following a successful initial interview all applicants will receive an induction pack containing a copy of the Equal Opportunity Policy (EOP). This will be followed by induction training at which the EOP will be considered in detail.

Applicants will be specifically asked if they understand the EOP and whether they have any concerns regarding their ability to deliver professional Community Interpreting services within the EOP. Any concerns will be discussed and their informed agreement recorded by signing the Contract for Services which states that they will abide by the Equal Opportunity Policy.

SIS operates an Allocation Policy that aims to ensure an equitable distribution of interpreting assignments without compromising quality standards and appropriate client need.

SIS operates a Grievance Procedure which is considered at induction.

Employees

Every employee will be inducted into the EOP and briefed following the annual Management Committee review of the EOP.

All employees have a duty to co-operate with the EOP.

Each employee will receive Equal Opportunity and Diversity training within 6 months of commencing employment. Employees will attend refresher training every 2 years.

Employees can expect equitable access to promotion and training opportunities that fit organisational need. SIS will strive to equitably manage access to appropriate personal development opportunities.

The Contract of Employment clearly states the terms and conditions that all employees can expect. This includes provision for pension, sick pay, annual leave, maternity leave and pay, family support leave, other leave and grievance.

The Contract of Employment also contains the Disciplinary Procedures. There is provision within the Disciplinary Procedure to suspend any member of staff for gross misconduct where harassment, victimisation or other discriminatory behaviour occurs.

Disciplinary and dismissal procedures will be monitored to ensure that discriminatory practice is avoided.

Management Committee

There is a target of 50% Black and ethnic minority membership of the Management Committee. The purpose is to reflect the experience and knowledge of individuals from local Black and minority ethnic communities who can provide invaluable guidance in the effective performance of SIS within those communities. Each member will complete an ethnic monitoring form. There will be a regular agenda item to discuss progress towards this target.

Management Committee Members will be actively encouraged to attend Equal Opportunity and Diversity Training.

Community Relations

SIS will operate a cycle of outreach, promotion and consultation meetings with Black and minority ethnic community organisations. SIS will match our experience with that of the Black and Minority Ethnic Community Partnership (BMECP) when considering how to be as inclusive as possible.

SIS will seek to improve membership from within the Black and minority ethnic communities.

SIS will seek to provide appropriate support for Chinese New Year celebrations, International Women's Day, Black History Month, Refugee Week, Holocaust Remembrance Day, Sudanese Coptic Association events and local Divali festivals and any other appropriate community remembrance and celebratory events.

SIS will attend the Brighton & Hove Racial Harassment Forum, Domestic Violence Forum and Refugee Forum. SIS works collaboratively and will establish dialogue concerning best practice and service improvement. SIS will attend training in completing the Pan Sussex Racist Incident Report Form.

Monitoring & Review

The Management Committee and the 2 Co-Managers are responsible for effective implementation of the EOP. From April 2006 lead responsibility for implementation will be delegated from the Management Committee to the Director (*core business*), with support from the Director (*new business*).

There will be an annual review of the EOP. **The next review is due in the Autumn of 2009.** Each new policy will be considered by the Management Committee for its affect on the EOP. The target for membership of the Management Committee will also be reviewed annually.

SIS will monitor unmet interpreting need against language and take appropriate action where individuals, language groups and B&em communities are being excluded from our services. This will include the rapid recruitment of community interpreters where gaps are identified in the pool of sessional workers.

SIS will survey annually a representative cross-section of clients. This will address satisfaction with service accessibility and community interpreting performance. We will evaluate the results to seek ways of improving service delivery.

There will be an annual satisfaction survey of all active core language community interpreters.

The Recruitment Monitoring Form will be used as the basis for annual reviews of the effectiveness of the Equal Opportunity Recruitment Policy.

SIS will operate a clear and accessible Complaints Policy and will maintain a record of all written comments regarding service delivery. SIS defines a complaint as any expression of dissatisfaction. All comments and complaints will be considered for their implications on delivery of equality of opportunity and service improvement.

>Selection & recruitment

> Advertising

1) Vacancies will be advertised internally and externally simultaneously unless approval is granted by the SIS Management Committee to vary this procedure. Advertising will include circulation to SIS Community Interpreters.

2) Advertisements will be placed as widely as possible, including local Black and minority ethnic (B&ME) newsletters and appropriate B&me press. Funding applications will reflect these costs.

3) Advertisements will contain the reference "*striving towards equality, opportunity and appropriate service delivery*".

4) Advertisements will be clear and unambiguous.

5) Appropriate use will be made of the relevant legislative exemptions designed to improve recruitment of women and individuals from B&me communities.

> Job Description

1) Every job will have a clear and concise job description (JD)

2) Skills, knowledge, experience, qualifications and behavioural requirements will be relevant and appropriate for each specific vacancy.

3) The JD will refer to the SIS Equal Opportunities Policy. The JD will contain a clear written reference to every employee's responsibility to adhere to and promote the EOP.

> Person Specifications

1) All jobs will have a person specification (PS) accurately describing the qualities and skills necessary to perform the duties of the job. These will be reviewed prior to each recruitment. All selection criteria will be established before the process begins.

2) Person Specifications will be divided into essential and desirable criteria, the former will always include ability to adhere to and promote the Equal Opportunity Policy.

3) Essential criteria and qualifications will strictly represent the minimum competencies required to fulfil the JD duties.

4) Care will be taken to avoid unnecessarily restrictive criteria that may act to exclude groups which experience discrimination. Particular vigilance will be paid to indirect discrimination.

5) Any requirement for particular type or length of experience, especially in areas where oppressed groups are disadvantaged, should be examined to ensure that individuals who may have similarly appropriate experience in other areas of work are not excluded. Additionally the experience and skills individuals may have developed in an earlier period of employment, or outside of paid employment, will be given full consideration. Part-time and voluntary experience will also be given full consideration. Life experience has equal validity with formal experience.

> Information to applicants

1) The following information will be supplied to all applicants, beginning with a clear reference that all information can be made available on tape and in large print:

An Application Form, which must be completed by all applicants.

Guidelines on how to complete the Application Form

Background service information & Annual Report

Equal Opportunities Policy & Monitoring Form

Job Description & Person Specification

Details of the selection process

Details of where the post holder will be based, unsociable or irregular hours of work and travel. Applicants with a disability will be invited to discuss specific requirements.

> **Shortlisting for Interview**

- 1) Shortlisting will be based exclusively on a consistent application of criteria from the JD & PS. This includes all applicants with a disability.
- 2) To maintain impartiality and fairness no one connected by friendship or blood to an applicant should be involved in the shortlisting process without the written permission of at least two company directors.
- 3) All members of the recruitment panel should participate in the shortlisting, interview and selection process. Where this is not possible a minimum of 2 members must be involved. A Chair will be elected. The panel should reflect the diversity of SIS's client and staff base.
- 4) The Management Committee will ensure that the recruitment panel are competent to carry out this policy. All Directors and staff responsible for recruitment must receive appropriate and regular training. Resource requests to meet this commitment will be submitted with the relevant grant applications.

> **Interview and Selection**

- 1) The recruitment panel will meet in advance to prepare interview questions. These will be phrased simply, cover the same range of topics for each candidate and relate to criteria. The substance of the question will not vary according to the candidates perceived ethnic origin, culture, religion, disability, gender, marital status, sexuality or age.. The panel will establish by a simple question whether each candidate has fully understood the requirements of the job.
- 2) The panel will test the candidate for awareness of and support for the Equal Opportunities Policy. Questions will probe understanding of the importance of a multi racial workforce and client base and test the candidates ability to appropriately challenge racism and discrimination.
- 3) Each member of the recruitment panel will keep detailed notes of every interview to aid the fair comparison of applicants. These notes will inform the scoring of each candidate.
- 4) At the end of the interview, where there is doubt about any candidates suitability for employment because of the nature of the disability, further advice should be sought from the candidate, an independent doctor and a representative disabled organisation. The candidate may request that advice be sought from their own doctor. Any costs incurred will be met by SIS. Information should seek detailed advice concerning the availability of employment aids and appropriate organisational support.

5) If any member of the recruitment panel considers that discrimination has occurred in the interview s/he must immediately notify the Chair of the panel. Details should be recorded in writing. If the matter is unresolved a selection decision will be deferred until there has been consideration by the Management Committee and/or any Personnel and HR sub committee.

6) At the end of the interviews the Chair of the recruitment panel will collect all application forms and interview notes. They will be kept for 6 weeks after the recruitment process has finished. All information is confidential to the panel. If a dispute arises information may be shared with the Management Committee and relevant staff on a need to know basis.

> References

1) Listed referees will be contacted only after an offer of appointment has been made. Referees will be informed that the reference will be made available to the successful candidate.

2) References Will be measured against the job criteria. Any statement in the reference which might justify future disciplinary action must be checked by the panel and discussed with the candidate, if appropriate.

=> Unsuccessful Candidates

1) Unsuccessful shortlisted candidates will be given brief but specific written feedback concerning their application. This will be co-ordinated by the chair of the recruitment panel immediately following the decision to appoint a candidate.

> Monitoring

1) The monitoring form will contain details of why an applicant has been unsuccessful in a specific recruitment process. The forms will be kept for at least 3 years.

2) The monitoring forms will be used as the basis for annual reviews of the effectiveness of the equal opportunities recruitment policy.