

Translation and Accessible Communication Policy

Document Owner	Operations Director
Prepared by	Policy Officer Knowing Our Tenants Working Group
Approved by	Directors Group
Approved date	March 2025
Date of next review	March 2028
Monitoring, Auditing and Reporting	<ol style="list-style-type: none"> 1. Where a resident has informed us of a communication need, we will automate a review every 2 years to ensure accuracy. 2. Complaints relating to this policy will be monitored and any trends will be assessed and actions raised to address any issues with this policy. 3. This policy will be reviewed every 3 years and an Equality Impact Assessment completed at the next review to assess the impact of this policy.

1. Scope and Aims

- 1.1. Hexagon Housing Association (Hexagon) is committed to providing equitable and inclusive services to residents and to providing different forms of communication to ensure the accessibility of key information.
- 1.2. This policy seeks to meet Hexagon's obligations under the Consumer Standards. As part of the Consumer Standards, the Regulator of Social Housing expects Hexagon to:
 - 1.2.1. Understand the diverse needs of tenants, including those arising from protected characteristics, language barriers, and additional support needs, and deliver fair and equitable outcomes for tenants;
 - 1.2.1. Ensure that communication with, and information for, tenants is clear, accessible, relevant, timely and appropriate to the diverse needs of tenants;
 - 1.2.2. Ensure that landlord services are accessible, and that the accessibility is publicised to tenants.
- 1.3. In exercising this policy, Hexagon will use the criteria for reasonable adjustments as set out in the Equality Act 2010 and the Hexagon Vulnerable Residents and Reasonable Adjustments Policy. When considering what is reasonable, we will take into account:
 - 1.3.1. The effectiveness of the adjustment(s) in preventing or reducing the disadvantage for the person;
 - 1.3.2. The practicality of us making the adjustments;
 - 1.3.3. The availability of our resources, including external assistance and finance;
 - 1.3.4. Any disruption to the service that making the adjustment may cause.
- 1.4. For example, where a resident's needs can reasonably be met by providing information in a screen-reader friendly format, we would not provide this resident with documents in Braille due to the differing impact of these options on our resources.

2. Equality and Diversity

- 2.1. This Policy seeks to meet Hexagon's obligations under the Equality Act 2010 by ensuring equitable and inclusive access to our services, with due consideration of diverse needs and the requirement for accessibility.

3. Policy Statement

- 3.1. Hexagon understands that residents have diverse needs when it comes to communication and understanding information. Hexagon will communicate information by email, website, text, and through our online resident portal; we also commit to maintaining non-digital methods of contact such as by phone, letter, and face-to-face meetings.
- 3.2. Hexagon have an Induction Loop system in the Hexagon office reception area and a meeting room. We also have a portable Induction Loop system that we can provide throughout the Hexagon office or another meeting venue.
- 3.3. Hexagon commits to having accessibility tools available on our website, including translation tools, so that residents with diverse needs can access the information on our website.
- 3.4. Upon the request of the resident (or the representative of a resident) Hexagon can provide the requested information in any of the following formats:
 - 3.4.1. Translated into any language
 - 3.4.2. Large print
 - 3.4.3. Braille
 - 3.4.4. Audio recording, or by phone call
 - 3.4.5. In a face-to-face meeting
 - 3.4.6. Easy Read
 - 3.4.7. Dyslexia friendly fonts and colour contrasts
 - 3.4.8. In a format that supports screen-readers / text-to-speech software
 - 3.4.9. With a sign language interpreter in a meeting
 - 3.4.10. With a language interpreter on the call or in the meeting.
- 3.5. We aim to provide the information in the requested format within 10 working days of receiving the request.
- 3.6. To request information in any of these formats, please contact us by:
 - 3.6.1. Phone: 020 8778 6699
 - 3.6.2. In person: 130–136 Sydenham Road, Sydenham, SE26 5JY

3.6.3. Text: 07537 400 527

3.6.4. Email: Customer-Desk@hexagon.org.uk

3.6.5. You can also make the request to any member of staff.

3.7. Once you have let us know your required communication method or language, we will send you any legal notices by this method, or in your required language.

3.8. We will not translate or convert all communication to your required language or format as standard except for legal notices. If you receive any other communication from us that you require translated or converted, you can request this and we will aim to give you a translated or converted document within 10 working days.

3.9. If you require any other information in an alternative format, such as a particular Policy or service standard, you can contact us to request this.

3.10. If you have let us know that you need information in a certain format, we will contact you at least every 2 years to check that the information we hold about your requirement is still accurate and up to date. You can contact us at any time to update your communication requirements.

3.11. In line with our Vulnerable Residents and Reasonable Adjustments Policy, you can request a reasonable adjustment related to communication such as requesting that we;

3.11.1. Follow up a phone or in person conversation with an email or letter confirming the information provided;

3.11.2. Follow up a letter or email with a phone call explaining the information provided;

3.11.3. Only (so far as is possible) communicating by letter/email/text rather than phone call, or vice versa.

3.12. These are examples of reasonable adjustments relating to communication, if you have another request not listed here, please get in touch to request this.

3.13. There are times where we are legally obligated to provide information in writing and so we will do so, however, upon the request of the resident we will also explain this information verbally; by audio recording, phone call, or face-to-face meeting.

3.14. Hexagon commits to allowing residents to be supported by a representative or advocate in interactions about our services.

3.15. Hexagon will offer support to residents with filling in Hexagon forms upon request.

3.16. Hexagon commits to providing signposting to English language support and training for residents upon their request.

4. Data Protection

4.1. This Policy will be enacted in line with our Data Protection framework, and in line with the UK GDPR and DPA 2018.

4.2. Where any resident data is being shared with a third party for the purposes of translation or otherwise altering communication to provide accessibility, all data protection due diligence will be completed as set out within Hexagon's Data Protection Framework. Data Protection Impact Assessments and Data Sharing Agreements will be completed where any resident data is shared with a third party to enact this policy.

5. Legal Framework

5.1. Equality Act 2010

5.2. UK GDPR

5.3. Data Protection Act 2018

5.4. Consumer Regulations

6. Related Hexagon policies, strategies and procedures

6.1. Vulnerable Residents and Reasonable Adjustments Policy

6.2. Communication Framework

Appendix 1: Equality Impact Assessment Initial Screening

Analysis of relevant data

Data Type	Summary and Analysis
Organisational Statistics	97% of Hexagon residents have English as their preferred contact language. This suggests a higher proportion of Hexagon residents have little or no English proficiency compared to the wider population, as the 2021 Census suggests that 98.2% of the population can speak English well. After English, French is the most preferred contact language of Hexagon residents. According to the 2021 Census data, in the boroughs where Hexagon has homes, the top 5 languages spoken after English are: Spanish, Portuguese, Polish, Italian, Tamil.
National / Regional Statistics	<p>The 2021 Census shows that 1.5% of the population of England and Wales report they cannot speak English well, and 0.3% report they cannot speak English at all. London had the lowest percentage of people whose main language is English (78.4%). Within England, British Sign Language is the main language of 0.04% of the population.</p> <p>The British Dyslexia Organisation states that 10% of the UK population is dyslexic. Gov.uk reports that nearly 2 million people in the UK are blind or partially sighted.</p>

Screening

Protected Characteristic	Is impact positive, negative, or none:			Reason
	Positive	Negative	No Impact	
Age	X			Older people are statistically more likely to require changes to communication to make it accessible; this policy will have a positive impact on meeting this need.
Disability	X			People who have a disability that impacts on their hearing, vision or reading will be positively impacted by this policy as it ensures the use of personalised accessible communication methods.
Sex			X	No impact identified
Gender reassignment			X	No impact identified

Race or nationality	X			This policy ensures that key communication will be translated which lowers barriers to accessing services for those who do not speak English.
Religion or belief			X	No impact identified
Sexual orientation			X	No impact identified
Socio-economic status	X			This policy removes the financial burden of translation services from the resident
Literacy	X			This policy ensures adjustments for those with low or no literacy

What are the arrangements for monitoring the policy and its impact on customers?

- Where a resident has informed us of a communication need, we will review this every 2 years to ensure accuracy.
- Complaints relating to this policy will be monitored and any trends will be assessed and actions raised to address any issues with this policy.
- This policy will be reviewed every 3 years and an Equality Impact Assessment completed at the next review to assess the impact of this policy.

As no negative impact has been identified for any group in this screening, we will not proceed to Part 2 of the Equality Impact Assessment.