

EQIA Submission – ID Number

Section A

EQIA Title	Interpreting and Communication Services for People who are Deaf and Deafblind
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Responsible Officer	Katherine Clark - ST SC
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Type of Activity

Service Change	No
Service Redesign	No
Project/Programme	No
Commissioning/Procurement	Commissioning/Procurement
Strategy/Policy	No
Details of other Service Activity	No

Accountability and Responsibility

Directorate	Chief Executives Department
Responsible Service	Strategic Commissioning
Responsible Head of Service	Simon Mitchell – ST SC
Responsible Director	Clare Maynard - ST SC

Aims and Objectives

A person's method of communication should not cause for them a barrier which obstructs them from accessing any services that they may need. D/deaf and deafblind Individual in Kent need to be able to live safely and independently in their local communities. Public sector agencies must therefore ensure equality of access to services within their communities and prevent discrimination as detailed in the Equality Act 2010. Kent County Council also has a statutory responsibility under The Care Act 2014 to meet the needs of people assessed as having eligible needs including individuals with sensory impairments.

- 11 million people in the UK are deaf or hard of hearing.
- There are 151,000 British Sign Language (BSL) users in the UK.
- Deaf people are more likely to have poor mental health - up to 50%, compared to 25% for the general population, and be unemployed - 65% of working age deaf people are in employment, compared to 79% of the general population

KCC currently has a Framework arrangement (contract reference SC18074) for Interpreting and Communication Services for People who are D/deaf and Deafblind used to purchase service from a list of pre-qualified interpreters and interpreting agencies. Other public sector organisations on Kent also have access to use this contract and contract partners currently include Kent Police, Kent Fire and Rescue Service and KMPT.

This Framework contract will expire in June 2023 and alternative purchasing arrangements for this service will need to be established before this date.

Recommendations – A new framework of external providers is put in place from June 2023 for the council to use when required to provide any type of communication support for people who are D/deaf or Deafblind.

Section B – Evidence

Do you have data related to the protected groups of the people impacted by this activity?	Yes
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It is possible to get the data in a timely and cost effective way?	Yes
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Is there national evidence/data that you can use?	Yes
Have you consulted with stakeholders?	Yes
Who have you involved, consulted and engaged with?	
Stakeholder Engagement - May 2022: Understanding of impact of service and any potential changes.	
Current service Providers - May 2022: Understanding existing provision and opportunities for service improvements.	
External contract partners - Jun 2022: Understanding of impact of service and any potential changes.	
National Registers of Communication Professionals Working with Deaf and Deafblind People (NRCPD) - 2021:Key knowledge regarding numbers of qualified interpreter across England and in Kent.	
Other local authorities (East Sussex CC & Medway Council) - May 2022: Knowledge of other purchasing and contracting solutions.	
Service user engagement - 2021: Importance of access to high quality interpreters for D/deaf people.	
CMT Equalities paper- 2022: Agreement to proceed with recommendations to improve equality for D/deaf citizens in Kent.	
Has there been a previous Equality Analysis (EQIA) in the last 3 years?	No
Do you have evidence that can help you understand the potential impact of your activity?	Yes
Section C – Impact	
Who may be impacted by the activity?	
Service Users/clients	Service users/clients
Staff	Staff/Volunteers
Residents/Communities/Citizens	Residents/communities/citizens
Are there any positive impacts for all or any of the protected groups as a result of the activity that you are doing?	Yes
Details of Positive Impacts	
<p>The procurement of specialist communication support for people who are D/deaf and Deafblind via a framework of qualified external providers will work dynamically to support services which are necessary but not always in high demand, enabling flexibility with bookings and the ability to book assignments efficiently and flexibly for people at a high level of quality.</p> <p>There is a national shortage of registered interpreters for D/deaf people, and demand exceeds supply in Kent as it does elsewhere in the country.</p> <p>Video Interpreting services will ensure high-quality low-cost provision is in place for short provision needs; this negates the need for interpreters requiring long time slots for very short provision e.g., ad-hoc communication requirements, providing best value services and increasing the likelihood that an interpreter can be sourced immediately.</p> <p>An external framework of providers will allow access to a range of communication methods, ensuring equality of access for everyone.</p>	

Research demonstrates that carers have sometimes been asked to act as interpreter for friends/ family/ partners/ which is inappropriate. The provision of externally sourced interpreting services will protect carers' rights.

Negative impacts and Mitigating Actions

19. Negative Impacts and Mitigating actions for Age

Are there negative impacts for age?	No
Details of negative impacts for Age	
Not Applicable	
Mitigating Actions for Age	
Not Applicable	
Responsible Officer for Mitigating Actions – Age	Not Applicable

20. Negative impacts and Mitigating actions for Disability

Are there negative impacts for Disability?	No
Details of Negative Impacts for Disability	
Not Applicable	
Mitigating actions for Disability	
Not Applicable	
Responsible Officer for Disability	Not Applicable

21. Negative Impacts and Mitigating actions for Sex

Are there negative impacts for Sex	No
Details of negative impacts for Sex	
Not Applicable	
Mitigating actions for Sex	
Not Applicable	
Responsible Officer for Sex	Not Applicable

22. Negative Impacts and Mitigating actions for Gender identity/transgender

Are there negative impacts for Gender identity/transgender	No
Negative impacts for Gender identity/transgender	
Not Applicable	
Mitigating actions for Gender identity/transgender	
Not Applicable	
Responsible Officer for mitigating actions for Gender identity/transgender	Not Applicable

23. Negative impacts and Mitigating actions for Race

Are there negative impacts for Race	No
Negative impacts for Race	
Not Applicable	
Mitigating actions for Race	
Not Applicable	
Responsible Officer for mitigating actions for Race	Not Applicable

24. Negative impacts and Mitigating actions for Religion and belief

Are there negative impacts for Religion and belief	No
Negative impacts for Religion and belief	

Not Applicable	
Mitigating actions for Religion and belief	
Not Applicable	
Responsible Officer for mitigating actions for Religion and Belief	Not Applicable
25. Negative impacts and Mitigating actions for Sexual Orientation	
Are there negative impacts for Sexual Orientation	No
Negative impacts for Sexual Orientation	
Not Applicable	
Mitigating actions for Sexual Orientation	
Not Applicable	
Responsible Officer for mitigating actions for Sexual Orientation	Not Applicable
26. Negative impacts and Mitigating actions for Pregnancy and Maternity	
Are there negative impacts for Pregnancy and Maternity	No
Negative impacts for Pregnancy and Maternity	
Not Applicable	
Mitigating actions for Pregnancy and Maternity	
Not Applicable	
Responsible Officer for mitigating actions for Pregnancy and Maternity	Not Applicable
27. Negative impacts and Mitigating actions for Marriage and Civil Partnerships	
Are there negative impacts for Marriage and Civil Partnerships	No
Negative impacts for Marriage and Civil Partnerships	
Not Applicable	
Mitigating actions for Marriage and Civil Partnerships	
Not Applicable	
Responsible Officer for Marriage and Civil Partnerships	Not Applicable
28. Negative impacts and Mitigating actions for Carer's responsibilities	
Are there negative impacts for Carer's responsibilities	No
Negative impacts for Carer's responsibilities	
Not Applicable	
Mitigating actions for Carer's responsibilities	
Not Applicable	
Responsible Officer for Carer's responsibilities	Not Applicable