

Multicultural Victoria Inquiry Report

Victorian Ethnic Affairs Commission, The Multicultural Victoria Inquiry Report, Melbourne, Victorian Ethnic Affairs Commission, 1995, pp 2-12.

Executive Summary

On 23 September 1994, the Premier of Victoria requested the Victorian Ethnic Affairs Commission to inquire into and report on the adequacy and appropriateness of services to Victorians of non-English speaking background (NESB).

As the Inquiry's *Statistical Profile of Victoria's Ethnic Communities* indicates, NESB people in Australia experience some fundamental disadvantages. Their income and educational attainment levels tend to be below the average. Unemployment tends to be higher than average for this group, regardless of level of education.

Some sources of disadvantage which members of ethnic communities face are beyond the scope of the Inquiry, in that they are principally the responsibility of the Commonwealth Government. For example, the Commonwealth Government is responsible for general economic settings, and, in the main, for employment policies and programs.

However, it is important for Victorian Government services to help alleviate the disadvantages encountered by NESB people. Differences in language, religious and cultural background can create a barrier to obtaining services, or obtaining quality services, from departments which are not sensitive to such differences.

Information Gathering and Findings

The Commission obtained information for the

Inquiry in a number of ways, including:

- conducting a literature review;
- making a call for submissions;
- holding a series of eight consultation meetings;
- conducting nine interviews with chief executive officers and staff of key departments;
- commissioning a client survey;
- undertaking a statistical analysis of the position of non-English speaking background Victorians; and
- obtaining specialist advice.

In consultations and submissions, ethnic community representatives made the point that clients from ethnic communities do not always experience the same access to services and the same standard of service as other clients of government departments. Participants suggested various reasons for this including:

- language barriers and underuse of interpreters;
- lack of understanding and acceptance in departments and agencies about the effect that differences in cultures and background have on the way clients experience services; and
- lack of data within agencies on actual and potential clients from ethnic communities.

The Client Survey indicated that, generally, clients of a whole range of government services, such as schools, hospitals and courts, gave a

good rating to the quality of the communication they experienced when dealing with staff. However, the results showed that some NESB clients do not experience the same level of service. Clients with low levels of English proficiency were less likely to find staff in government services easy to understand and helpful.

The Commission found that senior departmental managers are aware that they should not discriminate against any group of clients, and should endeavour to provide quality services to all, regardless of cultural, linguistic or religious background. The framework for all departments to work within to achieve quality services to NESB clients includes the *Equal Opportunity Act 1984* (Vic.) which prohibits discrimination in the provision of goods and services on several grounds, including race, ethnic group, nationality, religious beliefs and colour.

Individual departments have made overarching commitments to quality services to all clients, and have undertaken a number of initiatives 'on the ground' to make services more relevant to, and usable by, ethnic clients.

Departments are using the following methods to improve the quality of services to NESB clients:

- providing translated information materials;
- using non-print media, such as ethnic radio and video, to inform ethnic communities about services;
- using interpreters;
- having bilingual workers;
- cross-cultural training;
- using ethnic organisations to deliver services;
- inclusion of NESB clients in quality service surveys; and
- consultations with ethnic communities.

Directions for Change

Although many offices are working hard to make services more relevant and accessible to NESB clients, further improvements in the quality of services are needed. The recommendations in this report can be grouped into the following five areas.

Statements of Goals and Intent

The aim of providing accessible and quality services for all customers, including NESB clients, is not always stated and implemented in a planned, consistent fashion. Agencies need to make a commitment, in the plans for which they are accountable, to work towards equal access and equal quality services for ethnic clients.

Information for Planning of Services

More systematic processes to obtain information from clients and community organisations about the situation of particular ethnic groups could assist the planning process. Departments need to be able to identify the needs of the more recently arrived groups and of geographically isolated groups.

Recommendations are made regarding improved use of data and consultations, and about drawing on the knowledge of ethnic communities, when planning services.

Interpreting and Translated Information

The quality and usage by departments of interpreting services and translations is an area which has been seen over many years as in need of improvement.

Departments need to ensure that basic services such as interpreting and provision of translated materials are adequately resourced and monitored.

Recommendations are made regarding provision of interpreters, and the information and media

techniques used to communicate with ethnic clients.

Staff Skills

Staff who deal with clients need to have particular communication skills and sensitivity to effectively assist people from a range of backgrounds. However, there is wide variation in the extent to which staff are trained to assist people from diverse backgrounds.

Recommendations are made regarding issues such as cross-cultural training and use of bilingual staff within mainstream programs.

Evaluation

Evaluation and monitoring of programs often does not specifically examine the impact of programs on NESB clients, despite evidence that the impact can be quite different depending on the linguistic and cultural background of the clients.

Evaluation could be more effective with better data, both about the existing and the potential NESB clientele.

There is also scope for more inter-departmental and inter-governmental cooperation in developing effective indicators and benchmarking on the quality of services which ethnic communities receive.

Tendering, Outputs and Technology

Recent developments in public sector management, and improvements in communications technology, have the potential to address some of these issues. For example:

- use of multimedia and new communications technology has the potential to reduce the barriers of distance in use of interpreters;
- output-based planning is designed to assist services to be clear about the quality of services which will be delivered to all clients;

and

- opening up services to competitive tendering can give ethnic organisations greater scope to provide services or parts of services on behalf of government.

The opportunity to improve service delivery to ethnic clients through such developments can be promoted by:

- initiatives in government to extend the supply of interpreting services and targeted information to ethnic communities by electronic means;
- working with ethnic communities to enable them to market their services to departments which are purchasing outside services; and
- helping departments to identify best practice and share information about promoting quality services to NESB clients.

Summary of Recommendations

Introduction

Review of Implementation

1. By April 1996, the Commission receive, from all relevant agencies, their response to the recommendations and their plans for implementing the recommendations made in this Report.

2. By April 1997, the Commission review the outcomes of the recommendations.

Themes Across Government

Business Plans

3. Departments be required to develop business plans which ensure that services to NESB clients are adequate and appropriate.

Output-Based Planning

4. The Department of Treasury and Finance collect and widely disseminate examples of output specifications incorporating specific provisions for the delivery of services to NESB clients.

5. The Ethnic Affairs Unit take up a specific responsibility to work with departments to develop budget output measures which recognise and cost services for the NESB population.

Indirect Discrimination

6. The Ethnic Affairs Unit investigate the need for information for departments on adapting service delivery to ensure that indirect discrimination does not occur in the provision of goods and services to NESB clients.

Data and Consultation in Planning

7. Departments develop strategies to involve ethnic clients in planning services and specifying outputs for contracted services.

8. The Inter-Departmental Ethnic Services Committee (IDESC) annually focus on new needs and strategies for ethnic communities, and particularly the needs of recently arrived groups.

Competitive Tendering

9. Examples of contract specifications containing indicators of quality of service delivery for ethnic clients be developed.

10. Costings for provision of services to ethnic clients, in various settings, be further developed for use in tendering of services.

11. When moving to unit costing, departments retain block funding for interpreting and other culturally related services. This should continue until reliable estimates are available for the cost of providing equal access to services for NESB clients.

12. A model for cooperation between ethnic organisations to jointly win tenders to deliver human services be developed. This should particularly involve ethnic organisations with small or scattered eligible client populations, and communities which do not have previous experience in tendering for services.

Availability of Interpreting Services

13. A study be commissioned on the extent of unmet need for interpreting and translating services across departments, and the reasons for such unmet need.

14. All service agreements with non-government agencies specify that the agency is obliged to provide an interpreter or translator where required or on request.

15. The Victorian Government encourage the National Accreditation Authority for Translators and Interpreters (NAATI) to take a proactive role in increasing the supply of interpreters by investigating options such as waiver of examination fees and/or financial assistance to study to qualify as an interpreter in hard-to-fill languages.

16. NAATI arrange for tests to be prepared by overseas examiners, when a shortage of local examiners causes delays in the scheduling of tests.

17. Following the feasibility study being conducted by the Ethnic Affairs Unit, the Government consider allocating funds from the *Victoria 21* new technology fund to:

- trial and promote the use of new technology, such as videoconferencing, to increase interpreting services to rural areas; and
- trial the development of multilingual technology-based information services.

The Interpreter Card

18. Departments identify key staff in departments and funded agencies for training in

the use of the Interpreter Card and ensure that training is provided on a continuing basis.

Information and Translations

19. Departments evaluate the effectiveness for ethnic audiences of all information, education and promotion strategies, including broad public information strategies and those targeted at specific communities.

20. Planning and evaluation of information strategies take account of the greater value of translated information to clients with the greatest need, such as new arrivals, rather than evaluating effectiveness simply in terms of numbers reached through translated information.

21. The Government consider increasing the five per cent requirement for ethnic advertising and promotion for departments with a large role in informing the public about available services and grants.

22. Departments be required to report to the Department of the Premier and Cabinet on how their allocations for ethnic advertising and promotions are spent.

23. Information-sharing among departments be promoted, with an emphasis on techniques used to inform ethnic communities through radio and electronic media.

24. A guide be developed on how to arrange effective translations.

Staffing Policy and Procedures

25. Departments provide cross-cultural training to all appropriate staff, with the complexity of the training varied according to the need of the position.

26. The Government examine the viability of a language allowance scheme for Victorian public servants with recognised language skills who use that language in their work.

Inter-Departmental Coordination

27. The Department of the Premier and Cabinet explore ways to provide NESB impact statements on relevant proposals for projects and legislation.

28. The 1996 workplan of the Inter-Departmental Ethnic Services Committee (IDESC) focus on mechanisms for regularly identifying and sharing information about best practice in service delivery to NESB clients in Victorian Government departments and funded agencies.

29. A mechanism be identified for annual public recognition of good practices in service delivery to ethnic communities.

30. Each department nominate a position which carries responsibility for monitoring ethnic issues and liaising with the IDESC. In large departments, each division nominate a person to liaise with the departmental representative.

31. The IDESC, supported by the Ethnic Affairs Unit, maintain and regularly publish a listing of services to ethnic clients.

Performance Indicators

32. Departments be required to comment each year, in their annual reports, on the impact of their programs on NESB Victorians.

33. When undertaking client surveys, departments make special efforts to include NESB clients wherever relevant. This will include provision of bilingual interviewers.

Action Across Governments

34. The Victorian Government support and monitor progress through the Council of Australian Governments to develop national indicators in the human services, including measures and benchmarks which can specifically inform about service quality to NESB clients.

35. The Ethnic Affairs Unit, in conjunction

with the Commonwealth-State relations section of the Department of the Premier and Cabinet, report to the Victorian Government on those areas of funding by the Grants Commission in which Victoria is underfunded in respect of the extra cost of providing services to NESB Victorians.

Departmental Issues

Department of Agriculture, Energy and Minerals

Agriculture Victoria

36. Agriculture Victoria develop an explicit policy of recruiting extension officers with relevant cultural and language backgrounds to work with rural ethnic communities where appropriate.

37. Agriculture Victoria include, as a specific part of its role, responsibility for working with other appropriate agencies to address barriers faced by rural ethnic communities in accessing services.

Department of Arts, Sport and Tourism

Sports and Recreation

38. Sport and Recreation Victoria ensure that information about its funding programs is made widely available to ethnic organisations.

39. Sport and Recreation Victoria act to increase sports and recreation assistance available for smaller ethnic groups, for example through promoting cooperation between local councils.

40. Sport and Recreation Victoria investigate ways to increase recreational and sporting activities available for NESB youth.

Cultural Activities

41. Arts Victoria maintain funding for Multicultural Arts Victoria, and widely publicise the ethnicity related activities currently funded, such as regional festivals.

42. Arts Victoria develop a policy on identifying, preserving and making accessible the cultural heritage of NESB Victorians.

Department of Business and Employment

Employment

43. Community Based Employment providers be assisted to counsel and advise their migrant clients in how to approach jobseeking in the Australian labour market.

44. Through all relevant ministerial and officials' meetings, the Victorian Government urge the Commonwealth Government to publicly review the adequacy of its current labour market programs for NESB jobseekers.

45. The results of Target Innovation Program projects to promote innovation in addressing labour market gaps be published and made widely available.

46. The Department and Adult Migrant Education Services (AMES) survey a sample of Community Based Employment clients who have failed to find work in part because of lack of English language skills. The review should identify:

- reasons why such clients have entered the labour market without the English language skills necessary for work-readiness; and
- whether the existing AMES and Department of Employment, Education and Training language training opportunities have been used by such clients.

Overseas Qualifications

47. The Department undertake research and projects identifying:

- inequitable barriers to employment faced by those with overseas qualifications comparable to Australian qualifications; and
- the adequacy of bridging courses available for

migrants and refugees, particularly in areas of skill shortages.

48. The Department make appropriate recommendations to the Office of Training and Further Education, professional bodies and relevant Commonwealth agencies regarding actions which could be taken to address employment barriers for the overseas qualified.

49. The Department investigate the feasibility and merits of co-locating the Overseas Qualification Unit and the Trade Certification Unit of the Office of Training and Further Education.

Employee Relations

50. The Department place high priority on providing information about the *Employee Relations Act* 1992 in community languages to NESB employers and employees.

Occupational Health and Safety

51. The effect of the 1992 Code of Practice for the Provision of Occupational Health and Safety Information in Languages Other Than English be evaluated, and the results made publicly available.

52. The Health and Safety Organisation include in its workplan ongoing research and monitoring of the changing composition of the NESB work force and new and emerging industries, in conjunction with other users of such data.

Small Business

53. Small Business Victoria draw up a profile of its potential client base in NESB communities, and produce key advisory materials in appropriate community languages.

Trade and Investment

54. The potential benefits of extending the number of countries targeted for export promotion activities be reviewed, and

appropriate action taken.

Youth Affairs

55. The Office of Youth Affairs request regional youth committees in regions with high ethnic youth populations to report on the needs of those populations and how they can be considered in committee activities.

56. The Office of Youth Affairs review its grants application and approval procedures to ensure that NESB communities have equitable access to grants.

Department of Education

Directorate of School Education

Assistance for NESB Students

57. Information on funds provided for ESL and expenditure on ESL by individual schools be made publicly available.

58. The Directorate of School Education publish information from the NESB census in its annual publication of statistics about Victorian schools.

59. The Directorate, in conjunction with the Ethnic Affairs Unit, compile a brief overview of comparative retention and achievement rates to Year 12 and transition to tertiary education and training of NESB and other young people, and develop an action plan if retention and achievement rates for particular NESB groups appear lower than average.

60. The Department incorporate staff ethnicity data in its centralised Human Resource Management Information System.

61. The multicultural education aides program be evaluated.

Students on Bridging Visas

62. The Victorian Government make strong representations to the Commonwealth

Government to provide funds to state departments of education for students on bridging visas.

63. The Department ensure that English language centres and schools and mainstream schools receive comparable funding for students on bridging visas to that received for other recent arrivals.

ESL and Interpreting Funds

64. The Directorate ensure that ESL resources provided to schools are used appropriately.

65. The Directorate retain a credit line for interpreting and translating services for schools.

Support for NESB Parents

66. Areas of misunderstanding or lack of clarity about policies and procedures be systematically addressed through an information strategy targeting ethnic communities which addresses:

- frameworks for increasing NESB community representation in school management and decision making;
- the availability of interpreters and translated information; and
- provisions for diverse religious and cultural practices, including how students can be exempted from a dress code and practise their faith during school hours.

Multicultural Education Policy

67. The Minister for Education continue to pursue, through the Ministerial Council for Employment, Education, Training and Youth Affairs, the addition of cultural understanding as the eighth key competency.

68. High priority be given to the completion of the Community Relations Project, as part of a strategy to combat racism and intolerance in schools.

Staff Cross-Cultural Training

69. Managing Diversity training be provided to all school principals and other senior teachers.

70. The guide for school principals on incorporating Managing Diversity performance indicators in performance plans be finalised.

71. Cross-cultural training be provided to teachers and school staff where appropriate.

After-Hours Ethnic Schools

72. The Victorian Government make strong representations to the Commonwealth Government to remove the ceiling on the number of students whose study in ethnic schools is subsidised by dollar-for-dollar funding from the Commonwealth Government.

Department of Education

Office of Training and Further Education

English as a Second Language for Adults

73. The State Adult, Community and Further Education Plan be widely circulated among ethnic communities for comment before being finalised, notwithstanding the level of NESB representation on regional Adult, Community and Further Education councils.

Access to and Effectiveness of Adult ESL Classes

74. The Department fund ESL providers to explore options for the use of new technology to assist migrants and refugees to learn English.

75. Proximity to public transport and child care facilities be criteria for funding of ESL programs.

76. When revising its funding policy, the Office of Training and Further Education consider, as part of its Community Service Obligations, the apparent high costs of offering courses in rural areas.

Vocational Education and Training

77. The Office of Training and Further Education evaluate the impact which industry training plans have had in increasing the language and literacy levels in the work forces they cover.

78. The Office of Training and Further Education evaluate the efforts of Group Training companies to target NESB people in recruitment to positions.

Department of Health and Community Services

Planning and Monitoring

79. The principles and practices outlined in the foreshadowed Action Plan be developed and circulated as soon as possible, with a view to prompt implementation.

80. The Department promptly review *Working with People from Non-English Speaking Backgrounds; Guidelines for Health Agencies* to take into account recent changes to health funding.

81. Each division be required to report publicly on an annual basis on initiatives to make all internal and funded services accessible to NESB communities.

82. Accessibility requirements included in service agreements incorporate performance indicators and targets for NESB clients.

83. Ability to meet performance targets for service accessibility to NESB clients be a precondition of further funding.

84. The potential of the new Integrated Service Agreements Management System to report on provisions for NESB clients in service agreements be developed.

85. A summary of hospital preferred language data, and the number of interpreter services, be provided by hospitals (when available).

Consultation

86. The Action Plan include specific strategies for adequate consultation with ethnic communities in the planning and evaluative phases of services.

87. Communities for whom regionally based consultation is not appropriate be identified in the Action Plan, and alternative consultative mechanisms identified for these groups.

Information in Community Languages

88. The Ministerial Ethnic Health and Community Services Council establish principles for information provision, and widely disseminate examples of good practice.

89. Every division of the Department of Health and Community Services be required to develop a NESB information strategy, with ethnic community representatives being involved in both development and implementation.

Bilingual/Bicultural Workers

90. The Department encourage funded service providers to employ bilingual/bicultural staff through strategies such as adjusting funding agreements to provide a financial incentive to employ and train bicultural staff.

91. The Department assess the potential for undergraduate and postgraduate training of health professionals in bilingual and bicultural studies.

Culturally Sensitive Services

92. *The Home and Community Care Cross Cultural Training Manual* be adapted to other Department of Health and Community Services programs.

93. Divisions and funded agencies be required to allocate a specified proportion of their training budget each year to cross-cultural training.

94. An evaluation of the effectiveness of cross-cultural training form part of the performance assessment of managers responsible for staff development in service areas.

95. The Department strengthen training and research on cross-cultural needs in child, adolescent and family welfare, either through extending the responsibilities of existing agencies or through establishing a separate unit.

Health Interpreting Services

96. In the review of health interpreting provision, the Department continue to give priority to providing qualified, specialist health interpreters to health services.

97. The Department remind hospitals and other health providers that it is:

- Victorian Government policy that an interpreter be provided on request; and that
- the hospital's responsibility to budget for expected demand for interpreters where a free service is not likely to be available.

98. Resources be allocated to trial the use of videoconferencing technology to link rural NESB people with city-based health interpreters.

99. Interpreting services and health services develop arrangements to have interpreters 'on call' for emergency services.

100. The Department of the Premier and Cabinet encourage NAATI to work with tertiary institutions to develop short courses in medical interpreting.

NESB Grants to Hospitals

101. The amount of NESB grants be reviewed after a study of all the added costs of servicing a NESB population, including the extra time practitioners spend in consultations, the cost of interpreters, and the cost of information services to diverse populations.

102. The appropriateness of the criteria for allocating NESB grants be reviewed taking into account factors additional to the number of NESB separations which affect costs to hospitals, including: number of NESB outpatients; work with community organisations following early discharge; English proficiency of NESB patients; the range of community languages spoken by patients; and the higher cost of providing interpreters in rural areas.

Mental Health Services

103. The Department as a priority finalise the Strategy for Provision of Services to People from NESB who are consumers of public mental health services.

104. More bilingual mental health professionals be employed and trained to conduct assessments and provide support for other mental health professionals.

Women's Health Services

105. The Department review the adequacy of health services for NESB women, including obstetrics and gynaecology, breast cancer screening, mental health and disability, and take appropriate action.

Youth Health Services

106. The planned Adolescent Services Strategy include strategies for effective delivery of health and community services to NESB youth.

Ancillary Health Services

107. The Department develop appropriate models of discharge planning for NESB patients.

Home and Community Care

108. The process of inviting and commissioning Home and Community Care projects be reviewed, to ensure that some communities are not excluded through lack of knowledge of

processes or not being part of an established network.

Disability Services

109. Disability Services develop a policy statement on, and accompanying strategies, for service delivery to ethnic clients.

Preschool and Child Care Services

110. The Preschool and Child Care Branch, as a priority, develop a policy statement on the need for culturally sensitive and appropriate child care practices in all settings. This statement include provision for adequate ongoing support for child care centres and preschools in developing more culturally appropriate practices and staff training.

111. Guidelines for after-school and holiday program committees of management encourage management and staff to take the cultural diversity of the families which use their services into consideration when planning activities.

Family Violence and Counselling Services

112. A comprehensive plan be developed to address family violence in NESB communities.

113. As a priority, child protection staff be provided with training and guidelines on cross-cultural issues relating to all aspects of Protective Services work with clients.

114. Targeted information campaigns be undertaken, in cooperation with ethnic communities, on the rights and responsibilities of spouses and parents in Victoria.

Juvenile Justice

115. The research projects which form part of the Juvenile Justice Plan be followed up with funded projects to implement findings.

Department of Justice

Legal Interpreting Services

116. The notice on how to obtain an interpreter (now in English only) be provided as a multilingual notice; and be reworded to acknowledge that defendants who speak some English may need an interpreter, if their English is inadequate to understand legal proceedings, or to be understood.

117. All notices issued by the PERIN Court and Sheriff's Office include a multilingual notice advising of the importance of the notice and how to obtain assistance to understand the document.

Legal Information

118. Proforma statements/instructions used within the Department of Justice be translated into community languages.

119. The effectiveness of translated pamphlets as an information strategy be evaluated.

120. If found to be effective, all pamphlets about specific jurisdictions, specific legal issues and other community information be translated into community languages.

121. Increased community legal education be provided through ethnic radio and other alternatives to the printed word.

122. Funding at present provided under the Ethnic Tenancy Project continue to be specifically provided for tenancy services to NESB clients after the projected completion of the project in July 1996.

Cross-Cultural Training

123. Cross-cultural training be provided for all appropriate new and existing staff working in the Department of Justice.

Ethnicity Data

124. Ethnicity data be collected on

- police personnel; and
- on people appearing before courts and tribunals

125. The latter data be used to help determine which language groups may require multilingual notices, translated pamphlets, and targeted community information efforts.

Access to Justice

126. As a priority, issues relating to the prevention of racial violence, and to NESB people's access to justice and mediation, be subject to review by the appropriate body.

Department of Planning And Development

Housing

Housing Adequacy

127. The Ecumenical Housing research project, on refugee housing needs, develop ways to flexibly allocate housing to address the needs of large families.

Bilingual/Bicultural Staff and Cross-Cultural Training

128. All staff working in areas with a significant proportion of NESB clients be required to undertake cross-cultural training.

Client Information and Support

129. The Department undertake cooperative work with the Commonwealth Department of Immigration and Ethnic Affairs and the Office of Training and Further Education to ensure that immigrants and refugees are provided with clear information about public housing on arrival and during ESL classes.

130. The Department develop a program to add

multilingual information to all departmental correspondence to clients.

131. Funding guidelines for tenants' services include explicit requirements to ensure accessible and appropriate services for NESB tenants. These provisions should be effectively monitored by area offices.

Department of Transport

Cross-Cultural Training

132. All appropriate staff within the Department of Transport undertake cross-cultural training as a part of customer service or communication in the workplace training.

Information in Community Languages

133. Projects being trialed by VicRoads to make drivers' licence and registration information more accessible include, as a high priority, multilingual applications.

Access to Transport

134. The Department explore ways to encourage the provision of transport in regional areas, in conjunction with local communities.

Office of Local Government

Quality Service Standards

135. Councils be encouraged to set and implement standards for their services to NESB clients.

136. Councils be encouraged to include requirements regarding service delivery to NESB clients in tender specifications.

137. The Government endorse the Proforma on Access and Equity in Tender Processes as a guide for councils.

138. The Ethnic Affairs Unit, in conjunction with the Office of Local Government, conduct an annual workshop on best practice in

municipal service delivery to ethnic clients.

Planning and Coordination

139. A Standing Council on Local Government Ethnic Affairs be established.

Interpreting and Translating

140. Councils be encouraged to provide an interpreter when needed.