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SA Health

Policy

Equity of Access, Interpreting and Translating

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Version 2.0

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Government
of South Australia

SA Health

1. Name of Policy

Equity of Access, Interpreting and Translating.

2. Policy statement

This policy provides the mandatory requirements to ensure:

- > access to public health services is equitable to all health consumers, and
- > compliance with the [South Australian Interpreting and Translating Policy for Migrant and Non-Verbal \(Sign\) Languages](#).

3. Applicability

This policy applies to all employees and contracted staff of SA Health; that is all employees and contracted staff of the Department for Health and Wellbeing (DHW), Local Health Networks (LHNs) including state-wide services aligned with those Networks and SA Ambulance Service (SAAS).

4. Policy principles

SA Health's approach to equity of access, interpreting and translating is underpinned by the following principles:

- > We acknowledge that individuals have a right to access health services that meet their identified needs.
- > We ensure health consumers understand their rights and responsibilities.
- > We ensure access to public health services is fair and equitable to all health consumers.
- > We recognise the barriers and inequities that may be faced across diverse health consumer groups.
- > We will ensure that health consumers who speak limited, or no English are supported when accessing or receiving public health care from SA Health.
- > We embed health literacy principles in our systems.

5. Policy requirements

Designing and structuring services

LHNs, SAAS and DHW divisions with health consumer facing functions must:

- > Ensure SA public health care is accessible, and is responsive to an individual's needs, ensuring the delivery of equitable outcomes.
- > Ensure local procedures and processes exist to reduce barriers to access, wherever possible.
- > Ensure diverse health consumer groups are consulted with, in relation to programs and projects impacting access to health services.
- > Ensure consumer feedback systems are in place.

Accessible, equitable and inclusive health care

LHNs, SAAS and DHW divisions with health consumer facing functions must:

- > Provide person centred care by:

- Ensuring health consumers are properly informed, provided with options, and understand the information provided to them.
 - Supporting health consumers preferences, needs and rights.
 - Supporting health consumers to gain an understanding of their health rights and responsibilities.
- > Provide trauma informed care by having awareness and acting with sensitivity in the recognition of the health consumer, carer and/or family who may have or are experiencing varying levels of trauma.
 - > Provide culturally safe and respectful care by not exposing health consumers to bias, discrimination or inappropriate behaviour, and understand cultural and social assumptions.

Communicating with consumers

When communicating with health consumers, SA Health employees must:

- > Provide health consumers with the relevant information regarding services, treatment options and costs in an open, clear, and timely manner.
- > Use plain language, appropriate to the health consumer's needs to ensure understanding.
- > Communicate sensitive information in an appropriate setting with recognition of the incapacitating effects of hospitalisation.

Interpreting and Translating

- > All SA Health employees and contracted staff must comply with the [South Australian Interpreting and Translating Policy for Migrant and Non-Verbal \(Sign\) Language](#).

LHNs, SAAS, and DHW divisions with health consumer facing functions must:

- > Operationalise the requirements of this policy through local procedures.
- > Keep record of all occasions when interpreting or translating services are required to assist in planning, budgeting, and compliance.
- > Engage professional interpreters during critical communications with health consumers.
- > Not use generative language translation applications during critical communications with health consumers.
- > Only use static translation tools that have been approved by the appropriate delegate (Executive Directors, Directors, heads of service/departments and other senior managers) within the LHN, SAAS, or DHW division, for day-to-day care of the health consumer, and not for critical communications.
- > Engage professional translation services to provide written documents for consumers where practicable.
- > Ensure the mode of interpreting is appropriate for each circumstance.
- > Hire interpreters/translators through a preferred interpreting and translating service and ensure interpreters/translators are certified by the National Accreditation Authority for Translators and Interpreters (NAATI):
 - except where languages are not available through a preferred provider in which case alternative providers can be used.
- > Ensure relatives, friends, and staff are not used as interpreters or translators for complex, technical or sensitive communications.
- > Bilingual staff must not be used for formal interpreting unless an interpreter is not available.

6. Mandatory related documents

The following documents must be complied with under this Policy, to the extent that they are relevant:

- > [Charter of Health and Community Services Rights Policy](#)
- > [Partnering with Carers Policy](#)
- > [South Australian Interpreting and Translating Policy for Migrant and Non-Verbal \(Sign\) Language](#)

7. Supporting information

- > [Consumer Information on Respecting Patients' Privacy and Dignity with Patient Centred Principles](#)
- > [Department for the Premier and Cabinet Interpreting and Translating Fact Sheets](#)
- > [Department of Human Services Disability Access and Inclusion Plan](#)
- > [Disability Employment Strategy 2020-2023](#)
- > [Health and Community Services Complaints Commission Charter of Rights](#)
- > [Interpreter & Translator Services Panel Buyers Guide](#)
- > [National Statement on Health Literacy – Taking action to improve safety and quality](#)
- > [Part Time Interpreters or Translators \(Public Service\) \(SA\) Award.](#)
- > [SA Health Guide for Engaging with Aboriginal People](#)
- > [South Australian Aboriginal Languages Interpreters and Translators Guide](#)
- > [South Australian Charter of the Rights and Freedoms of Vulnerable Adults](#)
- > [South Australian Policy Framework: Aboriginal Languages Interpreters and Translators](#)
- > [Staff Information on Respecting Patients' Privacy and Dignity with Patient Centred Principles](#)

8. Definitions

- > **Access to health services** means the timely use of health care services to achieve the best health outcomes. It covers entering the health care system, geographic availability, and the health service is one that a consumer trusts and can communicate with.
- > **Asylum seeker** means an individual who has fled their own country and seeking international protection.
- > **AUSLAN** means Australian sign language and is the sign language of the Australian Deaf community.
- > **Complex, technical or sensitive communications** means communication with health consumers that are of a complex, technical or sensitive nature, such as: admission to hospital and taking of a person's details, a diagnosis of a person's condition, the explanation of any proposed medical treatments, the signing of consent forms, the taking of consent for medical treatment or health care, any specific post-operative advice, any information given at time of discharge.
- > **Critical communications** means communication with health consumers around topics of:
 - o consent,
 - o diagnosis and prognosis
 - o medication or treatment regimen requirements
 - o discharge, and
 - o where communication carries risks of adverse outcomes.

- > **Diverse health consumer groups** means the varying social, economic and geographic circumstances of consumers, including but not limited to:
 - Aboriginal and Torres Strait Islander.
 - People living with a disability or cognitive impairment.
 - People living with a mental health illness.
 - People with complex and chronic health needs/conditions.
 - People living with alcohol or other substance abuse problems.
 - People from culturally or linguistically diverse backgrounds.
 - People from migrant, refugee and asylum seeker backgrounds.
 - People who identify as lesbian, gay, bisexual, intersex, transgender, queer or gender diverse.
 - Children and young people, especially those who are or have been under the guardianship of the Chief Executive of the Department for Child Protection.
 - Older people.
 - People from different faiths.
 - People who are homeless.
- > **Generative language translation apps** mean tools using machine translation (including with the use of AI) where the translation is created by a computer or program with no or minimal human intervention.
- > **Health consumer** means people who use or are potential users of health care services and their representative (including carers, substitute-decision makers, person responsible).
- > **Health literacy** means:
 - 'Individual health literacy' which includes the skills, knowledge, motivation, and capacity of a person to access, understand, appraise and apply information to make effective decisions about health and health care and take appropriate action, and
 - The 'health literacy environment' which includes the infrastructure, policies, processes, materials, people, and relationships that make up the health system and have an impact on the way in which people access, understand, appraise and apply health-related information and services.
- > **Migrant** means a person who changes their country of residence.
- > **Mode of interpreting** means in person, telephone, video, or AUSLAN or any other mode.
- > **Preferred interpreting and translating service** means panellists listed in the Interpreter & Translator Panel Buyers Guide being:
 - Oncall Interpreters and Translators (Oncall)
 - Interpreting and Translating Centre (ITC) (Department of Human Services)
 - Deaf: Can Do (DCD) [AUSLAN services only]
- > **Professional interpreter** means interpreters who are credentialed by the National Accreditation Authority for Translators and Interpreters at the Certified Interpreter/Translator level.
- > **Professional translator** means translators who are credentialed by the National Accreditation Authority for Translators and Interpreters at the Certified Interpreter/Translator level.
- > **Refugee** means a person who has fled their country because of war, persecution, or natural disaster, and meets the eligibility criteria under the applicable law.
- > **State-wide services** includes State-wide Clinical Support Services, Prison Health, SA Dental Service, BreastScreen SA and any other state-wide services that fall under the governance of the Local Health Networks.

- > **Static translation tool** means tools that assist in the translation process where the translation itself is created by a human including communication story boards, cue cards, and computer-aided translation software.

9. Compliance

This policy is binding on those to whom it applies or relates. Implementation at a local level may be subject to audit/assessment. The Domain Custodian must work towards the establishment of systems which demonstrate compliance with this policy, in accordance with the requirements of the [Integrated Compliance Policy](#).

Any instance of non-compliance with this policy must be reported to the Domain Custodian for the Legal and Corporate Governance Policy Domain and the Domain Custodian for the Risk, Compliance and Audit Policy Domain.

10. Document ownership

Policy owner: Domain Custodian of the Legal and Corporate Governance Domain

Title: Equity of Access, Interpreting and Translating Policy

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Contact for enquiries: healthpolicylegislation@sa.gov.au

11. Document history

| Version | Date approved | Approved by | Amendment notes |
|---------|---------------|---|--|
| 2.0 | 6/11/2023 | Deputy Chief Executive, Strategy and Governance | Updated and re-templated in accordance with Policy Framework |
| 1.1 | 15/5/2020 | Director Corporate Affairs | Incorporating Interpreting & Translating Requirements |
| 1.0 | 13/09/2019 | SA Health Policy Committee | Original approved version. |