



<p>Team Name: French Language Services</p> <p>Team Lead: Director – French Language Services</p> <p>Approved by: Director – French Language Services</p>	<p>Reference Number: ORG.1010.PL.002</p> <p>Program Area: Administration</p> <p>Policy Section: General</p>
<p>Issue Date: October 1, 2015</p> <p>Review Date:</p> <p>Revision Date: April 27, 2023</p>	<p>Subject: Interpreter Services – Language Access</p>

*Use of pre-printed documents: Users are to refer to the electronic version of this document located on the Southern Health-Santé Sud Health Provider Site to ensure the most current document is consulted.*

**POLICY SUBJECT:**

Interpreter Services – Language Access

**PURPOSE:**

The purpose of the policy is to ensure that Southern Health-Santé Sud:

- Provides direction and guidance to staff in appropriate use of Interpreter Services.
- Reduces risk associated with language barriers and ensures privacy and impartiality by coordinating Interpreter Services on behalf of clients for whom language is a barrier.
- Meets legal requirements for informed consent and privacy/confidentiality.
- Supports client safety and quality of care.
- Enhances the client experience.

**BOARD POLICY REFERENCE:**

Executive Limitation (EL-1) Global Executive Restraint & Risk Management  
 Executive Limitation (EL-2) Treatment of Clients  
 Executive Limitation (EL-3) Treatment of Staff

**POLICY:**

1. Southern Health-Santé Sud staff identify and document the client’s need or request for an Interpreter/specific language during intake and registration procedures.
  
2. In complex, significant, serious or urgent situations, staff exercise discretion in determining the reasonable timeframe to wait for the availability of Interpreter Services by assessing the

benefits versus risks to the client of communicating through an Ad Hoc Interpreter, i.e. client presenting to the Emergency Department with life-threatening injuries and where urgent interpretation is necessary/available through accompanying family/friend.

3. When Interpreter Services are deemed required by the client or the health care provider, staff make all reasonable efforts to obtain the services of an Interpreter for encounters (in-person, teleconference or videoconference) that include, but are not limited to, discussing, explaining, obtaining, or performing the following:
  - History taking, examination, assessment and/or intake
  - Diagnosis, prognosis, treatment plan, care plan and/or related changes
  - Client and family conference or health information/education session
  - Mental health issues and concerns
  - Treatment, procedure, or investigation and any related equipment
  - Informed consent
  - Medication instructions and/or explanations of potential side effects
  - Discharge plan
  - Use of seclusion and/or restraints
  - Advance care plan and/or health care directive
  - End-of-life issues and/or decisions
  - Client participation in research and evaluation activities
  - Legal, financial and/or insurance matters (including Manitoba Public Insurance). In general, a staff member must be involved in such encounters in order to meet service eligibility criteria
4. For confidentiality and accuracy reasons, Southern Health-Santé Sud discourages accessing family, friends and volunteers to interpret. When a client declines Interpreter Services and requests that a family member or friend interpret instead, all parties are made aware that Interpreters are trained to provide accurate, unbiased, confidential services and there are risks when the Interpreter is not a trained health Interpreter. Such discussions are documented in the health record and psychosocial support for the Ad Hoc Interpreter may be provided as applicable.
5. Regardless of client's choice, staff may choose to access Interpreter Services. Such discussions are documented in the health record. In such instances, staff reserve the right to access Interpreter Services to monitor interpretation for accuracy/faithfulness, completeness and impartiality.
6. Minors under the age of 16 years do not interpret, except in extremely urgent situations, after all possibilities have been exhausted. In such situations, Ad Hoc Interpreters who are minors, under the age of 16 years, are provided with psychosocial support, as applicable and per circumstances.
7. Interpreters decline to provide Interpreter Services in situations where there is a real or perceived conflict of interest, or in which they feel inadequately prepared, trained or

qualified. If no other interpreter is available and all parties agree to the disclosed limitations during an encounter, the interpreter may continue to interpret.

8. Ad Hoc Interpreters such as Bilingual or Multilingual Employees are authorized to interpret, on a voluntary basis, for relatively short periods (usually less than 20 minutes). These encounters take place on site, during the employee's normal work hours, with the approval of the employee's supervisor/manager. Following are examples of encounters that do not require Interpreter Services:
  - Activities of daily living
  - Routine menu selection (where there are no dietary restrictions or food allergies)
  - Completion of forms not related to history, diagnosis, consent
  - Instructions for procedures for which education/consent has already been given (i.e. x-ray, blood work, lab work)
  - Determination of need for Interpreter Services
  - Registration
  - Appointment scheduling
  - Friendly support (patient comfort, requests, emotional support)
  - Client services (way-finding, general information/orientation)
9. Sight Translations of Vital Documents unavailable in languages other than English or French are performed by Interpreter Services in the presence of a staff member and documented in the health record. Regarding consent forms, Interpreters are required to include, in addition to the signature/declaration of the Interpreter, hand written documentation of what Sight Translation and/or interpretation was provided.
10. Staff do not use Computer-Assisted or Machine Translation in lieu of Interpreter Services and/or certified Translation Services.
11. The provision of all Interpreter Services or the client's choice not to use an Interpreter is documented in the health record by authorized staff in accordance with existing policies on access to or entries into the health record.

#### **DEFINITIONS:**

**Ad Hoc Interpreters:** Untrained, unqualified persons who are called upon to interpret. These may include: staff, family members (including children), friends, registered volunteers, or bilingual/multilingual employees.

**Bilingual or Multilingual Employees/Bilingual or Multilingual Individuals:** Individuals with some degree of proficiency in two or more languages, usually English and a language(s) other than English, who are sometimes called upon to act as Ad Hoc Interpreters.

**Client:** Refers to all patients, clients, residents and substitute decision-maker(s) who may benefit from or request Interpreter Services (oral or visual).

**Interpreter:** An authorized and trained/qualified individual who facilitates spoken or visual language communication between two or more parties who do not share a common language by delivering, as faithfully as possible, the original message from a source into a target language. There are two common forms of Interpreter Services:

- Consecutive interpretation involves the conversion of a speaker or signer's message into another language after the speaker or signer pauses, in a specific social context (typically used in health care settings). In this form of interpreting, the interpreter may interrupt the speaker and ask him/her to repeat, clarify or rephrase so as to ensure accuracy and completeness in the delivery of the message.
- In simultaneous interpretation, the interpreted message is delivered nearly instantaneously after the original message (typically used in conference settings).

**Interpreter Services:** Interpreter services can be accessed via:

- Southern Health-Santé Sud Indigenous Health: for Indigenous languages
- Kivalliq Inuit Services: for Inuktitut
- E-Quality Communication Centre of Excellence (ECCOE): for American Sign Language (ASL)
- Shared Health Language Access: for all other languages - service in person (30+ languages), over the phone (200+ languages)

See Interpreter Services-Language Access flowchart (ORG.1010.PL.002.SD.01).

The range of services provided by an interpreter may include:

- **Conference Call:** Remote interpretation of a telephone conversation between two or more people who do not speak a common language. Can be used to schedule appointments, follow up or check in with clients after an appointment, procedure, etc., or to provide complex instructions prior to an appointment.
- **Face-to-face (in-person):** Interpreter is in the same room as the service provider and the client.
- **Home Visit:** Interpreter meets the service provider at the client's home and provides in-person Interpreter Services.
- **Message Relay:** Interpreter calls the client to relay information that has been provided by a third party, such as appointment details (name of service provider; appointment date, time, location; special instructions).  
Message Relay in the target language is performed as requested for face-to-face, home visit, teleconference or videoconference encounters.
- **Over-the-phone (OTP):** Interpreter from third party contracted service, i.e. *MCIS Language Solutions*, provides remote Interpreter Service over the phone as needed 24/7/365. OTP Interpreter Services can be used with hands-free speaker phones, dual handset phones, or less ideally with a regular phone handset that is passed back and forth. Note: Message Relay and Reminder Calls are not included in the services provided by OTP Interpreters.
- **Reminder Call:** Interpreter calls the client in accordance with Shared Health established guidelines, i.e. two (2) business days before the scheduled appointment to remind him/her of the appointment details (name of service provider, date/time, location and special instructions as applicable).

- **Sight Translation:** Conversion of a written document in one language to a spoken version in another language. The interpreter reads a document written in one language and instantly interprets it into another language.
- **Videoconference:** Interpreter provides remote services via MBTelehealth, Skype, Teams or Zoom.

**Language Constituencies:** The four Canadian constituencies that face barriers to health care and therefore benefit from language assistance services are:

- Indigenous people (First Nations, Métis, Inuit)
- Deaf/Deaf-Blind persons
- Minority speakers of official languages
- Newcomers (immigrants and refugees)

**Staff/Staff Member:** refers to Southern Health-Santé Sud staff.

**Translation:** Translation is the process whereby a translator converts a written text into a corresponding written text in a different language. Interpreter services are distinct from translation services. Examples of translation include but are not limited to:

- **Computer-assisted Translation:** Use of a number of tools, i.e. electronic dictionaries, glossaries, terminology databases, translation memories, to help a translator work accurately and quickly.
- **Machine Translation:** Use of computers to translate from one language to another without human intervention, i.e. Google Translate, Babble, etc.

**Vital Documents:** Includes but is not limited to intake forms, consent forms, education/information material (pertaining to a health care service, medical condition, or directives to follow), advance care plans and health care directives.

### **PROCEDURE:**

1. Staff identifies and documents the client's need or request for an Interpreter/specific language.
2. When Interpreter Services are deemed required by the client or the health care provider, staff make all reasonable efforts to obtain Interpreter Services. In complex, significant, serious or urgent situations, staff exercise discretion in determining the reasonable timeframe to wait for the availability of interpreter services by assessing the benefits versus risks to the client and Southern Health-Santé Sud of communicating through interpretation.
3. To access Interpreter Services, see below and/or refer to Interpreter Services-Language Access flowchart (ORG.1010.PL.002.SD.01):

#### **3.1. For Indigenous Languages:**

- Call Southern Health-Santé Sud Indigenous Health (1-204-239-2212) and ask for an Indigenous Support Worker; Monday-Friday, 7:30 a.m. to 3:00 p.m.

### 3.2. For Inuktitut:

- Kivalliq Inuit Services: Call 204-989-1025, 8:30 a.m. to 4:30 p.m. Monday-Friday. Evenings and Weekends on call.

### 3.3. For American Sign Language (ASL) - hearing impairments and/or combination visual and hearing impairments):

- Monday-Friday, 9:00 a.m. to 5:00 p.m.: Contact *E-Quality Communication Centre of Excellence (ECCOE)*. Intake instructions:
  - Book online appointment via [www.eccoe.ca](http://www.eccoe.ca)
  - Log in: SHSS; password: LAIS2015
  - Complete form, ensuring requester name and phone number are inserted in 'Notes' section
  - Enter client's name in 'consumer' field
  - If incurring booking difficulties, contact 204-926-3271 or [booking@eccoe.ca](mailto:booking@eccoe.ca)
- After hours, weekend service and emergency service: call 1-204-475-6332 or [emergency@eccoe.ca](mailto:emergency@eccoe.ca)

### 3.4. For all Other Languages:

- Monday-Friday, 8:00 a.m. to 3:00 p.m.: contact Shared Health Language Access; see section 3.4.1 below for intake process
- For over the phone immediate/emergency interpreter services (24/7), call *MCIS Language Solutions* at 1-888-990-9014; you will need to provide client ID (6351)

3.4.1. Requester completes all fields of the Interpretation Services-Language Access Requisition/Confirmation/Cancellation Form (ORG.1010.PL.002.FORM.01) and selects required service(s).

Considerations of note include:

#### 3.4.1.1. Message Relay

- When the client is under 18 years of age (under the age of full legal responsibility), the requester should include name of the parent(s)/guardian(s) under "Additional Information".
- For safety and/or privacy reasons, in cases where the interpreter must not call the client regarding an upcoming appointment, the requester **MUST** indicate this under "Additional Information" and **MUST NOT** include the client's telephone number in the demographics.
- Calls that may require in-depth conversation or clarification, or result in discussion and/or questions, require a Conference Call and therefore are not appropriate for Message Relay.
- Message relay and reminder calls are **NOT** performed by OTP Interpreters (OTP Interpreter Service is a third party contracted service). If Message Relay or Reminder Call are required in these instances, additional arrangements need to be made with Shared Health Language Access.

#### 3.4.1.2. Videoconferencing

The requester selects one of the following videoconference platforms as referenced on the Interpretation Services-Language Access

Requisition/Confirmation/Cancellation [form](#); options include:

- Skype, Teams or Zoom: Prior to scheduling an appointment on an online platforms, an interpreter is pre-booked using the Interpretation Services-Language Access Requisition/Confirmation/Cancellation [form](#); once the appointment is confirmed, the requester is responsible to book on the selected platform and to submit the required information to [languageaccess@sharedhealthmb.ca](mailto:languageaccess@sharedhealthmb.ca) to join the videoconference on the date of the scheduled appointment. This might include a conference ID and password or a link to the meeting. All email exchanges must comply with existing privacy and confidentiality guidelines.
- MBTelehealth: An interpreter must be booked/confirmed prior to booking MBTeleHealth; using [MBTelehealth Booking Form](#), the requester books all MBTelehealth site locations for the client, the service provider and the Interpreter, i.e. “near end” site and the “far end” equipment.

#### 3.4.1.3. Over-the-Phone (OTP)

- Message relay and reminder calls are NOT performed by OTP Interpreters (OTP Interpreter Service is a third-party contract service.) If Message Relay or Reminder Call are required in these instances, additional arrangements need to be made with Shared Health Language Access.

3.4.2. Requester faxes the fully completed form to the Shared Health Language Access Administrative Office only during the times indicated on the form (Monday – Friday; 8:00 a.m. to 3:00 p.m.). Incomplete forms will be returned to the requester.

3.4.3. Requester awaits confirmation of interpreter availability. Confirmations are typically faxed to the requester within 24-72 hours of receipt of the request form. Less commonly-used languages may require more time to schedule.

3.4.4. Once the confirmation has been received, the requester:

3.4.4.1. Informs the client and the service provider that an interpreter has been scheduled.

3.4.4.2. Documents in the client’s health record the Interpreter Services scheduling confirmation.

3.4.4.3. Informs Shared Health Language Access when changes have been made to scheduled appointments.

3.4.5. Cancellations: Language Access must be notified of cancellations whenever a Shared Health Language Access Interpreter has been scheduled. The requester completes this section as indicated on the form and faxes it to Language Access at 1-204-940-8650.

3.4.6. Day of Appointment:

3.4.6.1. General Instructions:

See Tips for working with professional interpreters (ORG.1010.PL.002.SD.02).

**Conference Call:**

- Interpreter calls staff member a few minutes prior to scheduled appointment.
- Staff member initiates three-way phone connection (calls client) and connects all parties to the call.
- Encounter takes place.
- Staff member documents on health record that the encounter has taken place and any other appropriate health information as required by documentation standards.

**Face-to-face (in-person):**

- Interpreter is in the same room as the staff member and the client.
- Interpreter arrives a few minutes prior to scheduled appointment.
- Encounter takes place.
- Interpretation Services-Language Access Requisition/Confirmation/Cancellation Form (ORG.1010.PL.002.FORM.01) is completed and signed by staff member and interpreter.
- Staff member documents on health record that the encounter has taken place and any other appropriate health information as required by documentation standards.

**Home Visit:**

- Interpreter and staff member enter premises together. (For safety reasons, the interpreter is not authorized to enter home visit premises until the staff member has arrived.)
- If the staff member is late or unable to attend the scheduled encounter, she/he must call Shared Health Language Access at 1-204-940-8563 (Monday – Friday; 8:00 a.m. to 3:00 p.m.) to inform Shared Health Language Access of the expected time of arrival. If the staff member is late and has not notified Shared Health Language Access, the Interpreter will attempt to reach the staff member by phone. If this is unsuccessful, the Interpreter will leave the location after the established 15-minute wait time.
- Encounter takes place.
- Interpretation Services-Language Access Requisition/Confirmation/Cancellation Form (ORG.1010.PL.002.FORM.01) is completed and signed by service provider and interpreter.



- Staff member documents on health record that the encounter has taken place and any other appropriate health information as required by documentation standards.

#### **Videoconference**

- All parties access the platform 5-10 minutes prior to scheduled appointment.
- Staff member documents on health record that the encounter has taken place and any other appropriate health information as required by documentation standards.

#### **Over-the-phone (OTP):**

- Staff member and client arrive a few minutes prior to scheduled appointment.
- Staff member dials toll free number as instructed and follows the Automated Voice Response (AVR) prompts. Interpreter is usually available within seconds. If not, call again in a few minutes.
- Once the interpreter is on the line, brief the interpreter, then engage in conversation with the client.
- Encounter takes place.
- Staff member documents on health record that the encounter has taken place and any other appropriate health information as required by documentation standards.

3.4.6.2. If a follow-up appointment is needed for continuity of care, a new request for Interpreter Services is completed. The same interpreter may be scheduled if requested, to the extent possible.

#### **3.4.7. Accounting:**

3.4.7.1. Invoice will be issued to the requester listed on the Interpretation Services-Language Access Requisition/Confirmation/Cancellation Form (ORG.1010.PL.002.FORM.01).

3.4.7.2. Requester sends invoice to Site/Program Director who processes invoice utilizing GL code 399-1-7111040-35090 and sends to Director – French Language Services via Southern Health-Santé Sud interdepartmental mail for processing/approval.

4. In all cases, the provision of Interpreter Services or the client's choice not to use an Interpreter is always documented in the health record by authorized staff in accordance with existing policies on access to or entries into the health record. As deemed appropriate, the request for interpretation services form may be added to the health record. (Note: When efforts are unsuccessful in scheduling an interpreter, the requester documents in the health record what measures were taken, by whom and what alternate measures were taken.)

**SUPPORTING DOCUMENTS:**

- [ORG.1010.PL.002.FORM.01](#) Interpretation Services-Language Access Requisition/Confirmation/Cancellation
- [ORG.1010.PL.002.SD.01](#) Interpretation Services-Language Access flowchart
- [ORG.1010.PL.002.SD.02](#) Tips for working with professional interpreters

**REFERENCES:**

[MBTelehealth Booking Form](#)

WRHA Interpreter Services – Language Access Policy : Sept 2016.

Accessibility for Manitobans Act (AMA), December 2013