

Cabinet – 12 February 2020

Award of New Contract for the provision of Interpretation, Translation, Transcription and Easy Read (ITTE)

Portfolio: Councillor Chattha, Personnel and business support

Related portfolios:

Service: Resources and Transformation

Wards: All

Key decision: Yes

Forward plan: Yes

1. Aim

- 1.1 To ensure that the Council has a flexible and effective Interpretation, Translation, Transcription and Easy Read (ITTE) contract in place which is fit for purpose and that the Council continues to provide an effective and equitable ITTE service in line with the Equality Act 2010.

2. Summary

- 2.1 Walsall Council has a legal obligation to provide accessible communication and make reasonable adjustments so people can access our services under the Equality Act 2010. Some of our service users may need information in languages and formats other than written or spoken English.
- 2.2 The Council's current framework agreement for ITTE expires on 31 March 2020. The Council must enter into a new agreement so as to be able to provide this service beyond this date.
- 2.3. The current framework has a number of providers providing the following elements of the ITTE service:
- Interpreting and translation for spoken languages;
 - Interpreting and language service professionals for Deaf people;
 - Transcription for blind and partially sighted people;
 - Easy Read for people with learning disabilities.
- 2.4 This is a key decision because the expenditure over the lifetime of the proposed contract will be in the region of £640,000, depending on the needs of Walsall's diverse communities.
- 2.5 The award of the new ITTE contract is being recommended following evaluation of tenders received against advertised criteria; and on consideration of the

outcome of the evaluation being that the proposed contract award is the most economically advantageous tender, based on the quality and the total price.

- 2.6 Feedback on the current service suggests that a framework agreement is confusing and difficult to manage. The new contract will therefore be awarded to one provider, selected following a compliant tender process, on a call-off basis. This will enable the Council to work more easily and collaboratively with the provider, leading to relationships of high support, high challenge and true collaboration, as well as the development of a strategic relationship, leading to better outcomes for our service users.
- 2.7 The move to one provider is in line with the current industry approach. Most Public bodies have only one provider and this has been confirmed through the Council's membership of and attendance at the West Midlands Local Government Equality Network. In addition, discussions with ITTE providers acknowledge that a one-provider approach is easier to manage.
- 2.8 Cabinet Members should refer to the private session report for confidential details and commercially sensitive matters relating to the evaluation of tenders.

3. Recommendations

- 3.1 Subject to consideration of the information in the private session of the meeting, Cabinet will be asked to:
- 3.2 Approve the award of a new contract, with a lifetime value in the region of £640,000, depending on the needs of Walsall's diverse communities, to Word360 Ltd, for the provision of Interpretation, Translation, Transcription and Easy Read (ITTE) service. This will be for the period from 01 April 2020 until 31 March 2023, with an option to extend by up to 12 months to 31 March 2024.
- 3.3 Delegate authority to the Executive Director of Resources and Transformation to enter into an agreement with the successful provider on behalf of the Council and to subsequently authorise the variation, sealing or signing of any associated contracts, deeds or other related documents.

4. Report detail

- 4.1 Levels of English proficiency in Walsall are high, and in line with the average for England and Wales. Overall, 92.6% of residents speak English as their main language; a further 5.0% do not consider English their main language but speak it well.
- 4.2 This still leaves some households in which no one speaks English as their main language and over 6,200 residents who cannot speak English well (1,200 of whom cannot speak the language at all). There are in excess of 75 different main languages used by the 7.4% of the population whose main language is not English. It should be noted that recent statistics suggest that around 130 different languages are now used in Walsall schools. The 2021 census is likely to demonstrate increases in this area.

- 4.3 The Family Resources Survey estimates the number of people with a disability in the United Kingdom to be 13.9 million (22% of the population). Applying this means there are likely to be over 51,000 people with a disability in Walsall. Not all disabled people will have a disability that requires communication in a format other than spoken or written English. However, estimates show that there could be over 14,000 people with alternative communication needs in Walsall, made up of:
- nearly 8000 (2.9%) with sight loss causing significant impairment
 - over 6000 (2.2%) with a learning disability
 - over 200 (0.08%) sign language users
- 4.4 Public Health England estimates the number of people with learning disabilities in England is 20 per 1,000 population. Using the Census 2011 population this would mean there are over 5,200 people in Walsall who have a learning disability. Not all these people would benefit from easy read, as this figure covers the whole range of learning disabilities. However, easy read is also useful for people whose second language is English and so it can be a very useful method for providing information.
- 4.5 We know that new and emerging communities are growing and demand for interpreting will potentially grow with it, so it is imperative that the Council continues to provide a first class interpreting service.
- 4.6 The current framework contracts have been extended to 31 March 2020 in order to accommodate a transition into the next phase of interpreting services.
- 4.7 There are several circumstances when service users need interpretation, translation or transcription, including:
- rights and responsibilities of citizenship and democratic processes - register to vote or take part in local consultations;
 - full assessment of the person's needs - medical, financial or legal;
 - legal consequence or loss of rights if not acted upon - social benefits, health care, social care, supported housing;
 - for personal or confidential information, where clear understanding and consent are required;
 - where the person has requested that a particular language or format is used;
 - understanding local rules and requirements e.g. rubbish disposal, parking restrictions and common courtesies.
- 4.8 Interpretation is required for all people:
- where it is a statutory responsibility to provide the information or access to services to all;
 - responses - involvement and consultation documents
 - supporting local community groups or intermediaries working directly with new migrants or non-English speaking communities;
 - enabling people to function effectively as citizens in society and be able to get along with others.

- 4.9 There are other times when ITTE services are beneficial, but are not a requirement. This will depend on the individual circumstances of the information and the customer. The Council does not encourage multilingual staff to use these skills as they go about their daily work, unless they have been specifically recruited for their linguistic skills.
- 4.10 During the autumn of 2019, a procurement process began to re tender for ITTE services. Equality remains at the very heart of service provision, so it will be crucial to ensure that interpreting services, in its entirety, must also remain a key element of that.
- 4.11 One provider will be awarded all elements of the ITTE contract, providing one point of contact for all interpreting needs. The tender process follows the same process as before and Procurement, Legal Services and Equality teams have worked closely to ensure that an appropriate and unbiased approach was taken through this process.
- 4.12 The decision to move to a single provider was approved at the December Corporate Equality Group, chaired by the Chief Executive.
- 4.13 Tenders are currently at the evaluation stage. A moderation meeting took place in January 2020, when a successful bid was selected. Sign off on that recommendation will be made, with a view to preparing intention to award notifications by 21 February 2020. Once this has been completed, Walsall Council will work with the successful provider in ensuring a first class service is ready to commence on 1 April 2020.
- 4.14 The evaluation of each tender is split 60% quality and 40% cost. This is in line with Procurement guidelines and approved as part of the initial process of establishing the tender application, with Procurement and Legal Services. The contract will be monitored by the Equality and Diversity team and this will feedback into the Corporate Equality Group, which is chaired by the Chief Executive. An ITTE report is published annually.
- 4.15 Whilst it is appropriate to use 2011 census information as evidence of Walsall's population, it should be noted that the changes in demographics in since then will have an effect on the figures presented above. Net migration, increased births over deaths and an aging population will contribute to how the ITTE service is being used.

5. Council Corporate Plan priorities

- 5.1 Equality is an underpinning support service which is integral to all areas of the Council delivering its services to all citizens. The provision of an effective ITTE contract will enable the Council to deliver upon its priorities set out in the corporate plan.
- 5.2 In terms of internal focus, the appropriate selection of an approved provider will ensure that Council services are efficient and effective. Regarding economic growth, the specification for the contract insists on the successful provider working with local interpreters and organisations providing ITTE. This will support

the outcome that supports job creation and accessibility throughout Walsall and the potential for sustainable job creation.

- 5.3 Enabling access to information in their own language will support residents, ensuring that everyone, including Children and those who are vulnerable, have an equal opportunity to participate and make decisions for themselves.
- 5.4 Communities, particularly those that are seldom heard and difficult to reach, are more likely to engage with the Council when it is clear that the Council can provide information to them in their language.

6. Risk management

- 6.1 The risks associated with entering into a new agreement are minimal. The tender process will ensure financial stability of the provider and, as the tender requires the successful provider to have an effective on-line management reporting programme monitoring of the contract during its term will be undertaken at every opportunity.
- 6.2 The risk of not entering into a new agreement is that the Council will not comply with the Equality Act 2010. In addition, if services use unregistered or no interpreters at all, there poses a risk for both the individual needing assistance and the Council, as information may be misunderstood, resulting in poor decision making, to the detriment of the individual and the Council.

7. Financial implications

- 7.1 The costs attributed to ITTE since a framework contract was put in place are set out in Table 1, below;

Table 1

2016-17	2017-18	2018-19
£50,617	£142,169	£157,209

- 7.2 The above figures demonstrate that the need for these services fluctuates in line with the demand.
- 7.3 This financial increase is consistent within the industry. Demand on services and public sector services remains high. In addition, the type of enquiry has often become more detailed and complex, resulting in more time demands on interpreters.
- 7.4 Walsall's diverse communities continue to grow, but a number of factors are suggested to have slowed the growth of spend down, including;
- A slight decrease in the number of actual bookings;
 - An increase in the use of telephone interpreting, which generally is a more cost effective approach to interpreting;
 - An increase in community engagement through such projects as the Walsall People Project, which has seen immediate and positive engagement results since its inception;

- Subsequently, as confidence grows in using English as a language, there is a reduced need to require interpreting and translation services;
- A reduction in the amount of bookings made for Polish interpreters, which has generally been the most requested language.

7.5 There is no designated central budget for ITTE service in the Council. Funding for all such services must come from the respective Directorate services. A simple breakdown of total bookings for the last financial year, below at Table 2, will demonstrate that Children's Services and Adult Social Care are the most consistent users of the ITTE service.

Table 2

Directorate	ASC	RandT	Child	EandE
Face to Face	292	25	1818	5
Telephone	28	8	654	4
Total	320	33	2472	9

- 7.6 Whilst acknowledging that the 2016 -19 contract is currently overspending against the current budget of £124,645, it should be noted that revised prices will mean that the new contract is anticipated to meet the proposed budget and may have a reduction. Based on the assumption that demand remains the same, a reduction is certainly most likely, given the initiatives identified in this section, as well as mainstreaming the process by having one provider. Costs have been and will continue to be reduced as there are additional controls in place, both internally and with providers, to ensure that framework providers only are used for ITTE purposes.
- 7.7 Walsall Council currently runs several government funded projects aimed at gathering intelligence about changing demographics and helping new residents to successfully settle into Walsall neighbourhoods. Walsall People Project and Walsall for All both have dedicated projects aimed at building community cohesion, particularly through helping people learn English. A new English Language Intelligence Unit was set up in August 2019, in order to map the current ESOL provision and open new community-led courses where they are most needed. In the long-term, this initiative should see a reduced demand for interpretation and translation services when accessing public sector services.

8. Legal implications

- 8.1 There are different legal obligations concerning provision of support for d/Deaf (i.e. sign language users and/or hard of hearing, but who may have English as their first language and may lip read and/or use hearing aids) and blind or deafblind people, compared to those who speak a community language.
- 8.2 Regarding disabled people (i.e. people who are d/Deaf, blind or deafblind), The Equality Act 2010 places a legal duty on all service providers to take steps or make "reasonable adjustments" in order to avoid putting a disabled person at a substantial disadvantage when compared to a person who is not disabled. Guidance produced by the Equality and Human Rights Commission states that "Anything which is more than minor or trivial is a substantial disadvantage." The

Act is explicit in including the provision of information in “an accessible format” as a ‘reasonable step’ to be taken.

- 8.3 The Equality Act 2010 places an additional duty on the Council as it is subject to the Public Sector Equality Duty (PSED). This requires the Council to have due regard to alleviate disadvantage experienced by people who share a protected characteristic, or to meet their particular needs, by making reasonable adjustments. Whilst not being able to speak English is not a ‘protected characteristic’ defined under the Equality Act 2010, supporting people in enabling them to receive information in their own language meets the needs of the PSED.
- 8.4 The Council will enter into a contract with the successful bidder in a form approved by Legal Services.

9. Procurement Implications/Social Value

- 9.1 Advice and guidance has been provided by the Council’s Procurement Team throughout this process. The procurement exercise which the Council has carried out in accordance with the Council’s Contract Rules and the requirements of the Public Contracts Regulations 2015 (PCR) and has given consideration to social value, in line with the Public Services (Social Value) Act 2012. The successful bidder has satisfied our Social Value Charter, by supporting and incorporating social value aspects in to the services to be provided under the contract. This includes:
- Preventing and tackling ill-health and supporting greater independence;
 - Support for looked after children;
 - Creating educational, training opportunities and supporting business;
 - Support local schools to raise aspiration and improve educational attainment;
 - Supporting provision of community managed facilities and social activities.
- 9.2 The Council published this opportunity on 18 November 2019, with a return date of 20 December 2019. A Contract Notice was published via the Official Journal of the European Union (OJEU) and was posted to the Council’s e-tendering portal In-tend, to alert the market to the tender, in accordance with PCR and the Council’s Contract Rules.
- 9.3 Tenders were opened on 23 December 2019, by the Senior Procurement Officer and Head of Business Change, using a formal opening ceremony on the In-tend e-tendering portal. The Council received eleven tenders, as set out in Table 3 below:

Table 3

Tenderer Name
AA Global Language Services
Absolute Interpreting and Translations
A to Z Interpreting and Translations Services
DA Languages
Five Star Languages
Global Translation Services
Inter Translation Services

K International
On Call Interpreters
Premium Linguistic Services
Word360 Translation and Interpreting Language Services

Tender Evaluation Process

The Tenders were evaluated in accordance with the criteria published in the ITTE, as shown in the tables below:

Weighted Price Criteria

- 9.4 The evaluation of this section is against information included in the pricing schedule.

Table 4

Criteria	Percentage
Price Scenario 1 - Translation	15%
Price Scenario 2 - BSL	15%
Price Scenario 3 Braille/Audio	5%
Price Scenario 4 Easy Read	5%
Total	40%

Weighted Service Criteria

- 9.5 The evaluation of this section will be against information included in the Tender Quality Questionnaire.

Table 5

Criteria	Percentage
Criteria 1 – Social Value	5%
Criteria 2 – Service Delivery Methodology	20%
Criteria 3 – Meeting Specification Requirements	15%
Criteria 4 – Equality Act	5%
Criteria 5 – Training, Development and Allocation	5%
Criteria 6 – Transcribing Documents	5%
Criteria 7 – Easy Read Questionnaire	5%
Total	60%

- 9.6 The tenders were evaluated by Brian Fitzgerald (Consultation and Equalities Officer), Irena Hergottova (Corporate Consultation and Equalities Lead) and Jay Patel (Senior Commissioning Officer for Complex Needs and Mental Health).

Tender Outcome

- 9.7 The tender attracted 35 expressions of interest and 11 bids. 8 of the tenders were from Midlands providers. Each member of the evaluation panel individually evaluated the tenders.

- 9.8 Following the individual evaluations, a moderation meeting was conducted, chaired by Procurement colleagues, to reach a consensus on which bid offered the best quality and value for money.
- 9.9 As part of the tender process and, in order to establish effective compliance with social value, all applicants for this contract were asked how, in the provision of this contract, would they assist the Council in meeting its social value charter. Applicants were requested to offer ways in which their organisation would support the Charter over and above the obligations of the contracted services set out in the specification.
- 9.10 Given the commercially sensitive nature of the tender evaluation information, a report detailing the outcome of the evaluation is provided in the Private Session Agenda Cabinet Report.
- 9.11 Steps have been taken to minimise procurement related risk. However, there will always remain an inherent risk of legal challenge associated with any procurement undertaken by the Council.

10. Property implications

- 10.1 None

11. Health and wellbeing implications

- 11.1 The purpose of an effective tender process for ITTE is to set out the principles which are needed to ensure a safe, high quality interpreting and translation service. The use of an inadequately trained (or no) interpreter poses risks for both the individual needing assistance and the Council. When this occurs, neither can be assured that accurate and effective communication is taking place. The error rate of untrained interpreters (including family and friends) may make their use more high risk, than having no interpreter at all.
- 11.2 The implementation of an effective ITTE service provision should assist people's ability to improve their own health and wellbeing. Potentially, the ITTE service works with some of the Borough's most vulnerable people; Children, people with disabilities (especially learning disabilities) and communities that are difficult to engage with. A service providing equal access to information and services will improve wellbeing and mental health.
- 11.3 The ITTE service will ensure that each users' individual and unique characteristics and requirements have been taken into account and catered for.

12. Staffing implications

- 12.1 None

13. Reducing Inequalities

- 13.1 The implications for reducing inequalities have been taken into account and assessed as set out below.

- 13.2 Walsall's population has risen by 6.2% from 253,401 in 2001 to 269,323 according to the 2011 census. The minority ethnic group population (everyone who is not White; English, Welsh, Scottish, Northern Irish or British) has shown an increase from 37,547 (14.81%) in 2001 to 62,085 (23.05%) in 2011.
- 13.3 Compared with the rest of the West Midlands (33.98%), Walsall (23.05%) has a lower percentage of minority ethnic group people and is the fifth lowest, compared with the other West Midlands areas. However, it is clear that, with new communities emerging, this figure is likely see higher percentages in the 2021 census.
- 13.4 The largest increase is in people of Asian background, with a rise from 10.4% of all ethnic minority people in 2001 to 15.2% in 2011. Within this group, those of Pakistani background have increased the most to 5.3% of all residents (although Asian Indian remains the largest minority ethnic group at 6.1%).
- 13.5 Nine out of ten Walsall residents (90.1%) were born in the UK. However, according to 2011 census only 1.0% of residents were born in EU Accession countries. This is lower that 2.0% in England and with neighbouring authorities of Wolverhampton (2.1%) and Sandwell (2.6%). However according to more recent University of Birmingham research¹ the proportion of European born population in Black Country is now closer to between 7-10%¹ and this explains some of the frequently requested new languages for interpretation and translation purposes.
- 13.6 The top requested languages from the current ITTE contract to 2017/18 are listed in Table 6 below:

Table 6

	Punjabi	Mirpuri	Polish	Urdu	Bengali	Slovak	Romanian
2016/17	178	167	311	250	204	142	
2017/18	253	256	433	312	222	185	244
2018/19	328	136	283	207	247	155	418

- 13.7 It is interesting to note that the Polish language is no longer the most requested language in 2018/19. As the most requested language in four of the previous six years, Polish has now been replaced by the Romanian language, which has seen a notable increase in the past two years and also by the Punjabi language, which has seen its most prolific usage since 2013/14.
- 13.8 Again, Walsall is seeing diverse languages being requested, as new communities continue to arrive in the borough. This is demonstrated by the fact that 45 languages were requested in 2018/19. However, it also is evident that interpretation and translation needs for the more common languages are still being requested. Looking at the breakdown of telephone and face-to-face bookings shows that more people are beginning to use the telephone service.

¹ <https://www.birmingham.ac.uk/Documents/college-social-sciences/social-policy/iris/2013/eu-accession-migration-final-conference-report.pdf>

Some languages, such as Mandarin, demonstrate a greater need for telephone interpreting than face-to-face.

- 13.9 Whilst it is appropriate to use 2011 census information as evidence of Walsall's population, it should be noted that the changes in demographics, particularly, following the EU enlargement are yet to be fully estimated. Walsall Council currently runs several government funded projects aimed at gathering intelligence about changing demographics and helping new residents to successfully settle into Walsall neighbourhoods.
- 13.10 Walsall People Project and Walsall for All both have dedicated projects aimed at building community cohesion, particularly through helping people learn English. A new English Language Intelligence Unit was set up in August 2019, in order to map the current ESOL provision and open new community-led courses where they are most needed. In the long-term, this initiative should see a reduced demand for interpretation and translation services when accessing public sector services.
- 13.11 The provision of this contract ensures that the Council meets its legal obligation to provide accessible communication and make reasonable adjustments so people can access our services under the Equality Act 2010.
- 13.12 An equality impact assessment (EqIA) is attached for consideration.
- 13.13 The new contract will continue to be a positive step in promoting and reinforcing equality in Walsall. As such, the revised three year plan will provide a positive effect across all characteristics, as there will be minor improvements to the contract.
- 13.14 The effective implementation and monitoring of the ITTE contract will mean that all characteristics, and in particular, disability, race, religion and belief and sex will be considered as part of any equality decision making process. All other characteristics can be given equal priority, as there is the opportunity, with any booking, to request an interpreter or service that reflects the individual needs, expectations and wishes of the enquirer.
- 13.15 Any complaints, concerns and issues around a protected characteristic will be closely monitored through a complaints process and evaluation meetings. Therefore, the potential for any negative impact on a protected characteristic is minimised.
- 13.16 The successful Provider will be expected to comply with the Council's Protocol and equality considerations. Failure to do so will invoke the Council's disciplinary processes.

14. Consultation

- 14.1 A variety of consultation exercises were undertaken, as demonstrated in the EqIA. This included face to face meetings with current ITTE providers, feedback from users of the current framework contract and discussions at the Corporate Equality Group.

- 14.2 The feedback suggests that the current ITTE services are fit for purpose. However, in order to assist Council staff in offering a first class service and service users in receiving the same, the proposed move to a single provider can be easily done with no negative effect on people with protected characteristics.

15. Decide

- 15.1 Cabinet is requested to approve the recommendations made in section 3 of this report.

16. Respond

- 16.1 In the event that Cabinet approve the award of this contract The Equality and Diversity Team will continue to work closely with Procurement in evaluating tenders, appointing the successful bidder and working with that provider to ensure that the contract is fully commissioned by 01 April 2020, is tailored and fit for purpose.
- 16.2 Where appropriate, the Council will complete a new supplier/payee set up process in March to ensure timely contract preparation signing and filing for contract commencement on 1 April 2020.

17. Review

- 17.1 The Contract will have a real time online management system, so all activity can be monitored on a daily basis. The successful provider will have regular review meetings, initially quarterly, so that any issues and concerns can be responded to promptly and efficiently.

Background papers

Equality Impact Assessment – **Appendix A**

Author

Brian Fitzgerald
Consultation and Equality Officer
☎ 07741 153257
✉ brian.fitzgerald@walsall.gov.uk



Dr Helen Paterson

Chief Executive
☎ 01922 652006

12 February 2020

B. Chattha

Councillor Bal Chattha
Personnel and Business Support Portfolio

12 February 2020

Equality Impact Assessment (EqIA) for Policies, Procedures and Services

Proposal name	Interpreting, Translation, Transcription and Easy Read services (ITTE)		
Directorate	Resources and Transformation		
Service	Community, Equalities and Cohesion		
Responsible Officer	Brian Fitzgerald		
Proposal planning start	30 May 2019	Proposal start date (due or actual date)	1 April 2020

1	What is the purpose of the proposal?	Yes / No	New / revision
	Policy		
	Procedure		
	Guidance – Code of Conduct		
	Is this a service to customers/staff/public?	Yes	New
	If yes, is it contracted or commissioned?	Yes	
	Other - give details		
2	What is the business case for this proposal? Please provide the main purpose of the service, intended outcomes and reasons for change?		
	<p>Good communication ensures our messages are understood and not misunderstood. Some of our customers may need information in languages and formats other than written or spoken English, so we need to provide them with accessible services. We have legal obligations to provide accessible communication and make reasonable adjustments so people can access our services under the Equality Act 2010.</p> <p>As a Council, we have committed to “meeting the needs and expectations of people who use services. This means fair access for all, ensuring that the customers of Walsall are treated with dignity and respect. All groups of customers will positively benefit from our services. Information to customers about services will be provided in accessible formats, based on their particular need as far as reasonable and within resources available.” Walsall Council Equality and Diversity Protocol; http://int.walsall.gov.uk/service_information/equality_and_diversity/equality_and_diversity_corporate_documents.</p> <p>This assessment covers the tender process for the 2020 – 2023 ITTE contract. The 2016 – 19 interpretation contract was a framework agreement, with suppliers providing one of more elements of the ITT service namely:</p> <ul style="list-style-type: none"> • Interpreting and translation for spoken languages; • Interpreting and language service professionals for Deaf people; • Transcription for blind and partially sighted people; • Easy Read for people with learning disabilities and whose first language is not 		



English.

The suppliers were ranked according to the quality and price of their bids using questions about their services, company, employees and workers, equality and ITTE expertise. The result was that the following providers were responsible for providing a variety of ITTE service to Walsall Council, as different skills are needed depending on what type of communication is required.

Interpretation and Translation - Word360;

Interpreting and communication for Deaf people - BID Services;

Transcription for blind and partially sighted people - Walsall Society for the Blind;

Easy Read for people with learning disabilities - Word360 (0121 554 1981)

Particularly with Interpretation and Translation, all bookings were made with the first ranked contractor and, if they could not do the work, then a second or third ranked contractor would be used. All Council services have access to book ITTE jobs, via the Council's intranet, where there are full instructions and guidance. Each service is responsible for payment as jobs arise as there is no corporate budget for ITTE.

Because of the need to simplify the process, it was decided to dispense with a framework contract for the 2020 contract. Instead, one provider will be awarded all elements of the ITTE contract, so providing one point of contact for all interpreting needs. The tender process will, however, follow the same process as before and Procurement, Legal and the Equality teams have worked closely to ensure that an appropriate and unbiased approach was taken through the tender process.

There are several circumstances when customers need interpretation, translation or transcription. For individuals that involve:

- rights and responsibilities of citizenship and democratic processes - register to vote or take part in local consultations;
- full assessment of the person's needs - medical, financial or legal;
- legal consequence or loss of rights if not acted upon - social benefits, health care, social care, supported housing;
- personal or confidential nature and clear understanding and consent are required;
- the person has expressed for a particular language or format in a prior communication;
- understanding local rules and requirements e.g. rubbish disposal, parking restrictions and common courtesies.

For all

- where it is a statutory responsibility to provide the information or access to services to all;
- responses - involvement and consultation documents
- supporting local community groups or intermediaries working directly with new migrants or non-English speaking communities;
- enabling people to function effectively as citizens in society and be able to get along with others;

There will be other times when it would be a good idea, but it is not a requirement. This will depend on the individual circumstances of the information and the customer. The council does not encourage multilingual staff to use these skills as they go about their daily work, unless they have been specifically recruited for their linguistic skills. However, the council accepts that there are occasions when staff may use their communication skills to assist customers, when they approach the council and can provide a valuable service. This is mainly at frontline level and if interpreter is not immediately viable. Customer details and basics can be taken with any request to arrange a meeting with an interpreter present.

Relatives and friends of customers, no matter what age or ability, should not be used for ITTE, to either access council services or to provide information to staff. This is because;

- there can be no guarantee of confidentiality and impartiality;
- they will almost certainly not have professional indemnity insurance;
- they will be unaware of professional or safe-to-practice standards.

The only time when they may be used would be in a social setting when there is no official business of the council being carried out.

For information, please find, below, some relevant detail from the previous year's ITTE contract;

Total Bookings	Completed
Telephone	694
Face to Face	1956
BSL	127
Total	2777

Top requested languages to 2017/18

	Punjabi	Mirpuri	Polish	Urdu	Bengali	Slovak	Romanian
2012/13	336	108	277	316	460	353	
2013/14	391	78	567	313	463	205	
2014/15	287	208	820	215	274	144	
2015/16	288	264	238	211	177	85	
2016/17	178	167	311	250	204	142	
2017/18	253	256	433	312	222	185	244
2018/19	328	136	283	207	247	155	418

It is interesting to note that the Polish language is no longer the most requested language in 2018/19. As the most requested language in four of the previous six years, Polish has now been replaced by the Romanian language, which has seen a notable increase in the past two years and also by the Punjabi language, which has seen its most prolific usage since 2013/14.

Again, Walsall is seeing diverse languages being requested, as new communities continue to arrive in the borough. This is demonstrated in the Table, below, where 45 languages were requested in 2018/19. However, it also is evident that interpretation and translation needs for the more common languages are still being requested. Looking at the breakdown of telephone and face-to-face bookings shows that more people are

beginning to use the telephone service. Some languages, such as Mandarin, demonstrate a greater need for telephone interpreting than face-to-face.

Language	Requested Bookings	Language	Requested Bookings
Albanian	12	Amharic	4
Arabic	27	Bengali	247
British Sign Language	127	Bulgarian	2
Czech	33	Dari	29
Dutch	2	Farsi	67
French	72	Greek	1
Gujarati	20	Hindi	9
Hungarian	210	Italian	16
Kapampangan	1	Kurdish	36
Kurdish - Sorani	29	Latvian	2
Lingala	2	Lithuanian	11
Mandarin	45	Mandinka	1
Mirpuri	136	Pashto	66
Persian	3	Polish	283
Portuguese	9	Punjabi	328
Romanian	418	Russian	15
Slovak	155	Somali	3
Spanish	130	Sudanese	5
Sylheti	19	Thai	7
Tigre	3	Tigrigna	12
Turkish	4	Twi	5
Urdu	207	Vietnamese	19
Yoruba	2		

It is clear that an ITTE service is very much required. Total costs have increased over the years, as can be seen from the box below;

2012-13	2013-14	2014-15	2015-16	2016-17	2017-18	2018-19
99,927	126,032	141,408	93,146	50,617	142,169	157,209

Whilst there has been an increase in expenditure for 2018/19, the increase is not sizeable, as compared with the dramatic increase from 2016/17 to 2017/18. This increase cannot be attributed to the cost of jobs, as there has not been a major change over the period 2012/19.

3 Who is the proposal likely to affect?

People in Walsall	Yes / No	Detail
All	Y	People whose first language is not English and those with disabilities.
Specific group/s	Y	
Council employees	Y	
Other (identify) – Walsall Council Councillors		

4 Please provide service data relating to this proposal on your customer's protected characteristics.

Walsall's population has risen by 6.2% from 253,401 in 2001 to 269,323 according to the 2011 census. The minority ethnic group population (everyone who is not White; English, Welsh, Scottish, Northern Irish or British) has shown an increase from 37,547 (14.81%) in 2001 to 62,085 (23.05%) in 2011.

Compared with the rest of the West Midlands (33.98%), Walsall (23.05%) has a lower percentage of minority ethnic group people and is the fifth lowest, compared with the other West Midlands areas. However, it is clear that, with new communities emerging, this figure is likely see higher percentages in the 2021 census.

Walsall population by broad group 2001 to 2011

Group	2001	2011
White British	85.2%	76.9%
All other White	1.2%	1.9%
Mixed	1.4%	2.7%
Asian	10.4%	15.2%
Black	1.4%	2.3%
Other	0.4%	0.8%

The largest increase is in people of Asian background, with a rise from 10.4% of all ethnic minority people in 2001 to 15.2% in 2011. Within this group, those of Pakistani background have increased the most to 5.3% of all residents (although Asian Indian remains the largest minority ethnic group at 6.1%).

Nine out of ten Walsall residents (90.1%) were born in the UK. According to 2011 census only 1.0% of residents were born in EU Accession countries. This is lower than 2.0% in England and with neighbouring authorities of Wolverhampton (2.1%) and Sandwell (2.6%). However according to more recent University of Birmingham research the proportion of European born population in Black Country is now closer to between 7-10%¹ and this explains some of the frequently requested new languages for interpretation and translation purposes.

The Council is committed to meeting the needs and expectations of people who use its services. This means fair access for all, ensuring that the customers of Walsall are treated with dignity and respect. All groups of customers will positively benefit from our services. Information to customers about services will be provided in accessible formats, based on their particular need as far as reasonable and within resources available.

¹ <https://www.birmingham.ac.uk/Documents/college-social-sciences/social-policy/iris/2013/eu-accession-migration-final-conference-report.pdf>

Walsall Council Workforce profile

The Walsall Council Workforce Profile for 2017 – 18, provides the following summary breakdown of employee protected characteristics;

Workforce Profile Summary

Directorate	Headcount	Male	% Male	Male P/T**	# % Male P/T**	Female	% Female	Female P/T**	# %Female P/T**	White British	% White British	ME*	% ME*	Ethnicity not stated ***	% Not Stated ***	Disabled	% Disabled
Children's Services	690	101	14.64%	13	1.88%	589	85.36%	137	19.86%	440	63.77%	186	26.96%	64	9.28%	22	3.19%
Economy & Environment	839	471	56.14%	40	4.77%	368	43.86%	125	14.90%	704	83.91%	118	14.06%	17	2.03%	30	3.58%
Resources & Transformation & CMT	1250	354	28.32%	74	5.92%	896	71.68%	565	45.20%	944	75.52%	265	21.20%	41	3.28%	57	4.56%
Adult Social Care	362	63	17.40%	5	1.38%	299	82.60%	66	18.23%	239	66.02%	109	30.11%	14	3.87%	29	8.01%
TOTAL	3141	989	31.49%	132	4.20%	2152	68.51%	893	28.43%	2327	74.08%	678	21.59%	136	4.33%	138	4.39%

Walsall Council Profile by Age and Directorate

Directorate	Headcount	16-24	%	25-29	%	30-34	%	35-39	%	40-44	%	45-49	%	50-54	%	55-59	%	60-64	%	65+	%
Children's Services	690	32	4.64%	65	9.42%	99	14.35%	95	13.77%	91	13.19%	87	12.61%	105	15.22%	79	11.45%	32	4.64%	5	0.72%
Economy & Environment	839	55	6.56%	54	6.44%	71	8.46%	106	12.63%	109	12.99%	111	13.23%	127	15.14%	147	17.52%	51	6.08%	8	0.95%
Resources & Transformation & CMT	1250	26	2.08%	45	3.60%	66	5.28%	112	8.96%	111	8.88%	183	14.64%	257	20.56%	241	19.28%	140	11.20%	69	5.52%
Adult Social Care	362	8	2.21%	20	5.52%	28	7.73%	47	12.98%	53	14.64%	64	17.68%	62	17.13%	62	17.13%	15	4.14%	3	0.83%
TOTAL	3141	121	3.85%	184	5.86%	264	8.40%	360	11.46%	364	11.59%	445	14.17%	551	17.54%	529	16.84%	238	7.58%	85	2.71%

Walsall Council Workforce Profile by Disability and Directorate

Directorate	Headcount	Disability	% Disabled	Not Disabled	% Not Disabled	Not Stated	% Not Stated
Children's Services	690	22	3.19%	559	81.01%	109	15.80%
Economy & Environment	839	30	3.58%	771	91.90%	38	4.53%
Resources & Transformation & CMT	1250	57	4.56%	1094	87.52%	99	7.92%
Adult Social Care	362	29	8.01%	311	85.91%	22	6.08%
Total	3141	138	4.39%	2735	87.07%	268	8.53%

Walsall Council Workforce Profile by Ethnic Group and Directorate

Ethnic group	Category	Children's Services	% Childrens	Economy & Environment	% Economy & Environment	Resources & Transformation & CMT	% Resources & Transformation & CMT	Adult Social Care	% Adults Social Care	Total Council Employees	% Total workforce
Asian or Asian British Category	Indian	52	7.54%	46	5.48%	120	9.60%	27	7.46%	245	7.80%
	Pakistani	15	2.17%	11	1.31%	32	2.56%	7	1.93%	65	2.07%
	Bangladeshi	3	0.43%	5	0.60%	9	0.72%	0	0.00%	17	0.54%
	Other Asian	2	0.29%	2	0.24%	4	0.32%	11	3.04%	19	0.60%
Black or Black British Category	Black African	12	1.74%	2	0.24%	9	0.72%	15	4.14%	38	1.21%
	Black Caribbean	50	7.25%	20	2.38%	40	3.20%	24	6.63%	134	4.27%
	Other Black	7	1.01%	3	0.36%	2	0.16%	9	2.49%	21	0.67%
Chinese	Chinese	1	0.14%	1	0.12%	0	0.00%	0	0.00%	2	0.06%
Mixed Category	White and Asian	5	0.72%	0	0.00%	5	0.40%	2	0.55%	12	0.38%
	White and Black African	3	0.43%	1	0.12%	0	0.00%	0	0.00%	4	0.13%
	White and Black Caribbean	17	2.46%	9	1.07%	7	0.56%	6	1.66%	39	1.24%
	Other Mixed	3	0.43%	1	0.12%	6	0.48%	0	0.00%	10	0.32%
White Category	British	440	63.77%	704	83.91%	944	75.52%	239	66.02%	2327	74.08%
	Irish	5	0.72%	3	0.36%	7	0.56%	2	0.55%	17	0.54%
	White - Other European	2	0.29%	5	0.60%	4	0.32%	1	0.28%	12	0.38%
	Other White	8	1.16%	8	0.95%	16	1.28%	3	0.83%	35	1.11%
Other Ethnic Group		1	0.14%	1	0.12%	4	0.32%	2	0.55%	8	0.25%
Not Stated		63	9.13%	12	1.43%	40	3.20%	11	3.04%	126	4.01%
Prefer not to say		1	0.14%	5	0.60%	1	0.08%	3	0.83%	10	0.32%
Total		690		839		1250		362		3141	100%

Walsall Council Workforce Profile by Religion or Belief and Directorate

Directorate	Children's Services	% Childrens	Economy & Environment	% Economy & Environment	Resources & Transformation & CMT	% Resources & Transformation & CMT	Adult Social Care	% Adults Social Care	Total Council Employees	% Total workforce
Buddhist	1	0.14%	0	0.00%	3	0.24%	0	0.00%	4	0.13%
Christian	171	24.78%	212	25.27%	418	33.44%	103	28.45%	904	28.78%
Hindu	9	1.30%	8	0.95%	16	1.28%	5	1.38%	38	1.21%
Jewish	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Muslim	13	1.88%	19	2.26%	43	3.44%	9	2.49%	84	2.67%
Other Religion	5	0.72%	3	0.36%	19	1.52%	8	2.21%	35	1.11%
Sikh	17	2.46%	23	2.74%	42	3.36%	10	2.76%	92	2.93%
No Religion	87	12.61%	150	17.88%	162	12.96%	52	14.36%	451	14.36%
Prefer Not to Say	17	2.46%	11	1.31%	19	1.52%	11	3.04%	58	1.85%
Not Stated	370	53.62%	413	49.23%	528	42.24%	164	45.30%	1475	46.96%
Total	690		839		1250		362		3141	100%

Walsall Council Workforce Profile by Sexual Orientation and Directorate

Directorate	Children's Services	% Childrens	Economy & Environment	% Economy & Environment	Resources & Transformation & CMT	% Resources & Transformation & CMT	Adult Social Care	% Adults Social Care	Total Council Employees	% Total workforce
Bisexual	1	0.14%	2	0.24%	1	0.08%	0	0.00%	4	0.13%
Prefer Not to Say	25	3.62%	19	2.26%	39	3.12%	7	1.93%	90	2.87%
Gay	3	0.43%	6	0.72%	2	0.16%	2	0.55%	13	0.41%
Heterosexual	328	47.54%	426	50.77%	693	55.44%	206	56.91%	1653	52.63%
Lesbian	5	0.72%	6	0.72%	3	0.24%	1	0.28%	15	0.48%
Not Stated	328	47.54%	380	45.29%	512	40.96%	146	40.33%	1366	43.49%
Total	690		839		1250		362		3141	100%

The Council has adopted a zero tolerance approach to all forms of unlawful and unfair discrimination on the grounds of age, disability, sex, gender identity, marital or civil partnership status, race, ethnic origin, colour, nationality, pregnancy or maternity, religion or belief (or no religion or belief), sexual orientation, class or social background, political belief or Trade Union affiliation. The ITTE contract is in place to provide fairness and opportunity for all involved in the Council's employment and service provision. The Family Resources Survey (<https://www.gov.uk/government/statistics/family-resources-survey-financial-year-201617>) estimates the number of people with a disability in the United Kingdom to be 13.9 million. Applying this means there are likely to be over 51,000 people with a disability in Walsall. Not all disabled people will have a disability that requires communication in a format other than spoken or written English. However, estimates show that there could be over 14,000 with alternative communication needs in Walsall, made up of:

- nearly 8000 (2.9%) with sight loss causing significant impairment
- over 6000 (2.2%) with a learning disability
- over 200 (0.08%) sign language users

According to the Census 2011 there were 205 people who used sign language as their main language, with 150 (73.2%) using British Sign Language and 14 (6.8%) using other forms of sign language.

Public Health England estimates the number of people with learning disabilities in England is 20 per 1,000 population. Using the Census 2011 population this would mean there are over 5,200 people in Walsall who have a learning disability. Not all these people would benefit from easy read, as this figure covers the whole range of learning disabilities. However, easy read is also useful for people whose second language is English and so it can be a very useful method for providing information.

Changing demographics

Whilst it is appropriate to use 2011 census information as evidence of Walsall's population, it should be noted that the changes in demographics, particularly, following the EU enlargement are yet to be fully estimated. Walsall Council currently runs several government funded projects aimed at gathering intelligence about changing demographics and helping new residents to successfully settle into Walsall neighbourhoods. Walsall People Project and Walsall for All both have dedicated projects aimed at building community cohesion, particularly through helping people learn English. A new English Language Intelligence Unit was set up in August 2019, in order to map the current ESOL provision and open new community-led courses where they are most needed. In the long-term, this initiative should see a reduced demand for interpretation and translation services when accessing public sector services.

5 Please provide details of all engagement and consultation undertaken for this proposal. (Please use a separate box for each engagement/consultation).

Consultation Activity

Type of engagement/consultation	Face to face/email/complaints process	Date	2016 - 2019
Who attended/participated?	Responses from various council officers		
Protected characteristics of participants	There is no confirmed data for protected characteristics, but the individuals would suggest a varied mix of protected characteristics.		
Feedback General feedback about the ITTE process, including ways in which the process could be improved. During this time, it was suggested that the process for booking an interpreter was complicated. There were a number of providers and this resulted in Council staff being unable to appropriately use the ITTE framework. This often resulted in breaches of use and confusion.			

Type of engagement/consultation	Meetings	Date	2019
Who attended/participated?	Representatives from the current preferred providers for ITTE. The Equalities team met with Walsall Society for the Blind on 11 April, Birmingham Institute for the Deaf (BID) on 28 June and Word360 on 16 July.		
Protected characteristics of participants	There is no confirmed data for protected characteristics, but the list of attendees will suggest a varied mix of protected characteristics.		
Feedback Outside of contract discussions, it was agreed that the Framework contract was not considered the best way forward. Whilst accepting that it would not be in a position to tender for a full ITTE contract, BID saw merit in one provider and would be happy to work with another main provider in supporting interpreting services. This provided the inspiration to include a bid from a group of providers as one bid in the tender process. Walsall Society for the Blind was generally unhappy with the framework agreement, as it received little or no work from the contract. Word360 was happy to move to a single provider and felt that most interpreting organisations that could offer such a service, would support such a process.			

Type of engagement/consultation	Face to face meetings, emails	Date	2019
Who attended/participated?	A representative from the Council's Procurement (Susan Wilson) and Legal (Christopher Kerr) teams.		
Protected characteristics of participants	There is no confirmed data for protected characteristics, but the list of attendees will suggest a varied mix of protected characteristics.		
Feedback Contract meetings mainly with Susan Wilson, which commenced on 10 September 2019 and including 25 September (with Christopher Kerr in attendance), 14 October, 23 October, 7 November, 13 November, 14 December and 23 December. These meetings determined the correct approach in establishing a			

tender process and agreed methodologies for the contract, specification, questions and associated documents required to determine a successful tender application. Outside of these meeting dates, emails and impromptu conversations would be undertaken to forward any barriers or concerns around the process.

Type of engagement/consultation	Corporate Equality Group	Date	2019
Who attended/participated?	12 members of the Corporate Equality Group attended this meeting, as well as a graduate working in Children's Services. Representatives included the Chief Executive (Chair), an Equality champion from each directorate, Human resources (HR) representative, Head of Legal, Trade union representatives and other key council and Equality officers.		
Protected characteristics of participants	There is no confirmed data for protected characteristics, but the list of attendees will suggest a varied mix of protected characteristics.		
Feedback Provided a brief update on the tender proposal and the way forward. There was no feedback provided.			

Type of engagement/consultation	Face to face meetings with Deaf Community	Date	2019
Who attended/participated?	Walsall Deaf residents, supported by Walsall Deaf Employment Services		
Protected characteristics of participants	All attendees had one or more disabilities, in particular, deafness. There was a mix of gender.		
Feedback Deaf people wanted equal access to services and information. The new ITTE contract will continue to provide this. In addition, the requirement in the specification, around advancing technology, will allow the Council to look at new ways of engaging with Deaf people, through video calls.			

Type of engagement/consultation	Corporate Equality Group	Date	02/12/2019
Who attended/participated?	12 members of the Corporate Equality Group attended this meeting, as well as a graduate working in Children's Services. Representatives included the Chief Executive (Chair), an Equality champion from each directorate, Human resources (HR) representative, Head of Legal, Trade union representatives and other key council and Equality officers.		
Protected characteristics of participants	There is no confirmed data for protected characteristics, but the list of attendees will suggest a varied mix of protected characteristics.		

	Feedback Approval granted for the ITTE approach. There was one question around the completion of the process in time for the 1 April start date. The confirmed schedule allayed fears of any delay.			
6	Concise overview of all evidence, engagement and consultation			
	The feedback suggests that the ITTE is fit for purpose. It has been agreed that the 2016 Framework contract, whilst maintaining a strong equitable process, was not an easy system to manoeuvre around. Therefore, to assist Council staff in offering a first class service and service users in receiving the same, it has been decided to move to a single provider for 2020 onwards. This can be easily done with no negative effect on people with protected characteristics.			
7	How may the proposal affect each protected characteristic or group? The effect may be positive, negative, neutral or not known. Give reasons and if action is needed.			
	Characteristic	Effect	Reason	Action needed Yes / No
	Age	The new tender process will continue to be a positive step in promoting and reinforcing equality in Walsall. As such, the revised three year plan will provide a positive effect across all characteristics, as there will be minor improvements to the contract. The effective implementation and monitoring of the ITTE contract will mean that all characteristics, and in particular, disability, race, religion and belief and sex will be considered as part of any equality decision making process. All other characteristics can be given equal priority, as there is the opportunity, with any booking, to request an interpreter or service that reflects the individual needs, expectations and wishes of the enquirer. Any complaints, concerns and issues around a protected characteristic will be closely monitored through a complaints process and evaluation meetings. Therefore, the potential for any negative impact on a protected characteristic is minimised. The successful Provider will be expected to work alongside the Council's Community, Equality and Cohesion team, in order to understand changing local demographics (Walsall for All & Walsall People Project) and work in partnership with voluntary and community sector providers, particularly where multilingual services are available. They will also have to comply with the Council's Protocol and equality considerations. Failure to do so will invoke the Council's disciplinary processes.		
	Disability			
	Gender reassignment			
	Marriage and civil partnership			
	Pregnancy and maternity			
	Race			
	Religion or belief			
	Sex			
	Sexual orientation			
	Other (give detail)			
	Further information			

8	Does your proposal link with other proposals to have a cumulative effect on particular equality groups? If yes, give details.	(Delete one) Yes
	Because of the nature of this work, all equality decisions will be reflected throughout Council services.	
9	Which justifiable action does the evidence, engagement and consultation feedback suggest you take?	
	A	No major change required
	B	Adjustments needed to remove barriers or to better promote equality
	C	Continue despite possible adverse impact
	D	Stop and rethink your proposal

Action and monitoring plan				
Action Date	Action	Responsibility	Outcome Date	Outcome
27/09/2019	Pre-Procurement - Supplier Consultation	Brian Fitzgerald	01/09/2019	Completed
22/10/2019	Prepare ITT document and provide specification to procurement	Brian Fitzgerald/Susan Wilson/Christopher Kerr	22/10/2019	Completed
14/11/2019	Develop Draft Conditions of Contract	Christopher Kerr/Susan Wilson	14/11/2019	Completed
04/10/2019	Prepare Advertisements	Susan Wilson	04/10/2019	Completed
14/11/2019	Sign Off Final ITT Documents and set up on e-Procurement system (InTend)	Brian Fitzgerald/Susan Wilson	14/10/2019	Completed

18/11/2019	Publish on InTend/OJEU/Contracts Finder	Susan Wilson	18/11/2019	Completed
20/12/2019	Tender Opening Ceremony	Susan Wilson	20/12/2019	Completed
15/01/2020	Evaluate Tenders	Brian Fitzgerald	15/01/2020	
17/01/2020	Moderation and Internal Review	Brian Fitzgerald/ Susan Wilson	22/01/2020	
24/01/2020	Sign off Recommendation Report	Brian Fitzgerald/ Susan Wilson	24/01/2020	
21/02/2020	Prepare Intention to Award Notifications	Susan Wilson		
03/02/2020	Prepare Cabinet Report	Brian Fitzgerald/ Susan Wilson		
12/02/2020	Cabinet Meeting	Brian Fitzgerald		
21/02/2020	Scrutiny Call-In	Brian Fitzgerald		
21/02/2020	Notify Intent to Award	Susan Wilson		
03/03/2020	Notify Successful and unsuccessful Companies	Susan Wilson		
01/04/2020	Complete New Supplier/Payee Set Up Process and Contract Preparation Signing and Filing	Brian Fitzgerald/ Susan Wilson		
01/04/2020	Contract start	Brian Fitzgerald		

Update to EqIA	
Date	Detail

Contact us

Community, Equality and Cohesion
Resources and Transformation

Telephone 01922 655797

Textphone 01922 654000

Email equality@walsall.gov.uk

Inside Walsall: [http://int.walsall.gov.uk/Service information/Equality and diversity](http://int.walsall.gov.uk/Service_information/Equality_and_diversity)