

From: **"Mochrie, Paul" <Paul.Mochrie@vancouver.ca>**
To: **"Direct to Mayor and Council - DL"**
Date: 6/19/2023 10:06:46 AM
Subject: Memo - Language Access Policy (ADMIN-073)
Attachments: 2023-06-16-CEC-Language Access Policy Memo.pdf
2023-06-14-CEC-Language Access Policy-ADMIN073-APPROVED.pdf

Dear Mayor and Council,

Please see the attached memo from Maria Pontikis on the City's new **Language Access Policy** (ADMIN-073), approved on June 14, 2023.

In summary:

- Language accessibility refers to **reducing barriers to accessing information or services for people with limited proficiency in English.**
- The policy establishes the principles and general standards for language accessibility in public-facing services provided by the City, with the overarching goal of **prioritizing critical/high-impact information** while reaching as many people as possible. The initial focus of the policy is on **translation.**

This new administrative policy will be presented publicly as a part of the City's annual update on the Equity Framework at the Council meeting on June 28, 2023.

If you have any questions, please contact Maria Pontikis at maria.pontikis@vancouver.ca or 604-218-6319.

Best,
Paul

Paul Mochrie (he/him)
City Manager
City of Vancouver
paul.mochrie@vancouver.ca



The City of Vancouver acknowledges that it is situated on the unceded traditional territories of the xʷməθkʷəy̓əm (Musqueam), Skwxwú7mesh (Squamish), and səliwətał (Tsleil-Waututh) Nations.

MEMORANDUM

June 19, 2023

TO: Mayor and Council

CC: Paul Mochrie, City Manager
Armin Amrolia, Deputy City Manager
Karen Levitt, Deputy City Manager
Maria Pontikis, Chief Communications Officer, CEC
Rosemary Hagiwara, Acting City Clerk
Teresa Jong, Administration Services Manager, City Manager's Office
Mellisa Morphy, Director of Policy, Mayor's Office
Trevor Ford, Interim Chief of Staff, Mayor's Office
Aftab Erfan, Chief Equity Officer, City Manager's Office
Michelle Bryant-Gravelle, Senior Director, Indigenous Relations, City Manager's Office

FROM: Maria Pontikis, Chief Communications Officer

SUBJECT: Language Access Policy (ADMIN-073)

RTS #: N/A

Dear Mayor and Council,

The purpose of this memo is to let you know about the City's new Language Access Policy (LAP), which was recently approved by the City Manager as an administrative policy (ADMIN-073). Implementation of this work flows from Council's 2023 Budget approval of funding for one RFT language access specialist position. For your awareness, the policy will be presented as a part of the update on the Equity Framework at the Council meeting on June 28, 2023.

Policy Overview

Language accessibility refers to **reducing barriers to accessing information or services for people with limited proficiency in English**, and includes translation and interpretation.

LAP establishes the principles and general standards for language accessibility in public-facing services provided by the City, with the overarching goal of **prioritizing critical/high-impact information** while reaching as many people as possible. The initial focus of the policy is on translation. Staff have developed an information-hierarchy to guide when the City should translate and into which languages. A simplified version has been summarized in table below.

The policy also touches on the respectful use of local Indigenous languages. As noted in LAP, guidelines and standards for the use of hən̓q̓əmi̓n̓əm and Skwxwú7mesh languages will require further engagement with xʷməθkʷəy̓əm, Skwxwú7mesh and səliłwətał Nations. As such, translation into hən̓q̓əmi̓n̓əm and Skwxwú7mesh is not recommended at this time.

Critical information for citywide audience	Non-critical information for citywide audience
<ul style="list-style-type: none"> Includes information that could impact public health and safety (e.g. heat emergency). Information in this category to be translated into the 12 most commonly used languages*: Traditional Chinese, Simplified Chinese, Tagalog, Spanish, Punjabi, Vietnamese, Farsi, Korean, Portuguese, French and Japanese 	<ul style="list-style-type: none"> Includes information related to compliance/regulations or public participation (e.g. tax notices). Information in these categories to be translated into the six most commonly used languages*: Traditional Chinese, Simplified Chinese, Tagalog, Spanish, Punjabi and Vietnamese. Translation of information “for public awareness only”, where no action is required, is optional (e.g. news releases).

*Most commonly used home languages based on 2021 Census data, including languages spoken by 0.5% or more and 1.0% or more of the City’s population for critical and non-critical information, respectively.

Scope

Given the breadth and complexity of this work, the policy will be implemented via a phased approach. **There are a number of areas that are excluded from the initial scope of LAP:**

- City Council, Council proceedings, and Council-appointed bodies
- Vancouver Police Board
- Vancouver Board of Parks and Recreation
- Vancouver Public Library Board
- Interpretation (communicating verbally into another language)
- Accessible communication for people with disabilities (e.g. ASL, Braille)
- Other documents such as human resources, legal (bylaws) and procurement

As an administrative policy, staff are able to review and refine LAP on an iterative basis, to better respond to changing demographic needs and emerging opportunities. Major updates will be shared with Council for information.

Should you have any questions, please let me know.

Thank you,



Maria Pontikis
 Chief Communications Officer, Civic Engagement and Communications

604.673.8121 | maria.pontikis@vancouver.ca

POLICY TITLE	Language Access Policy
CATEGORY	Administrative
POLICY NUMBER	ADMIN-073
POLICY OWNER	Civic Engagement and Communications
ACCESS	Public

PURPOSE

This policy establishes the principles and general standards for providing language accessibility for public-facing services provided by the City of Vancouver and City staff, with an initial focus on translation.

This is in recognition that providing accessible information about the City’s services, programs and activities, in ways that reflect the linguistic and cultural diversity of the city, is a key factor for members of the public to be informed and engaged and to feel a sense of belonging. Accessible communication helps reduce risk and improve the delivery of services, and also helps to address gaps in equity and cultural redress.

This policy also recognizes that local Indigenous languages, hən̓q̓əmiñəḥ and Skwxwú7mesh, are vital to the cultural identities of the xʷməθkʷəy̓əm (Musqueam), Skwxwú7mesh (Squamish), and səliwətał (Tsleil-waututh) Peoples, whose lands the City of Vancouver is situated on. To respectfully incorporate these languages into the City’s social and physical landscape will require ongoing organizational change.

As stated in the City of Vancouver’s UNDRIP Strategy¹: “Indigenous cultural practices have been intentionally, systematically, and severely impacted by colonization... The City is a colonial government, which has played an active role in displacing Indigenous Peoples and imposing Western systems and values onto these lands, and therefore has a responsibility to take action in remedying and accounting for these harms... This includes a need to support cultural revitalization, such as the restoration of the original languages of these lands, hən̓q̓əmiñəḥ and Skwxwú7mesh.” (p.13)

GUIDING PRINCIPLES

1. The City should be providing equitable access to its services for all people, regardless of English language proficiency.
2. Language access, at a minimum, should be prioritized in City services that:
 - 2.1 Have a greater impact, including greater potential consequences, to individuals with limited English proficiency; and/or
 - 2.2 Serve, or have the potential to serve, a significant number of individuals with limited English proficiency.

¹ <https://council.vancouver.ca/20221025/documents/p1.pdf>

3. To reach more people with limited proficiency in English, this policy prioritizes the languages that are used at home by the greatest proportion of people city-wide.
4. Recognizing the limitations of census data, where feasible, the City is encouraged to expand language accessibility to reflect emerging needs – beyond what can be identified by census data – in communities that face greater barriers.

Special consideration will be given to the visibility and availability of language services in hən̓q̓əmiñəm and Skwxwú7mesh languages at a pace appropriate to xʷməθkʷəy̑əm, Skwxwú7mesh, and səliłwətał's work in language reclamation and revitalization.

5. To reflect the changing demographics and needs of communities in the city, this policy and the practices that follow should be iterative and reviewed on an ongoing basis as needed.
6. The City has committed to taking action on the aspects of language preservation and revitalization that prioritizes the rights of the Nations. In addition to the UNDRIP Strategy, future policy work around and hən̓q̓əmiñəm and Skwxwú7mesh languages will centre Indigenous People's visibility and voice on the land and across the city, as guided by the Nations and respecting their protocols.
7. This policy supports and aims to align with the City's Equity Framework², which came from the need to address injustices and inequities experienced by a broader cross-section of our society.

SCOPE

The provisions of this policy addresses the translation of written content and applies to public-facing information provided directly by the City and City staff.

This policy is intended to be a starting point for offering a consistent approach to language access across City of Vancouver operations. At this time, the policy does not provide specific standards or guidelines to the following areas:

1. **Service areas:** This policy does not apply to the Vancouver Police Board, the Vancouver Board of Parks and Recreation or the Vancouver Public Library Board, although they are encouraged to adopt this policy. This policy also does not apply to members of City Council, Council proceedings, and Council-appointed agencies, boards and commissions.
2. **Interpretation:** Guidelines and standards for language interpretation may be developed in future updates of this policy. The City's 3-1-1 service continues to provide live interpretation when requested by members of the public.

² <https://vancouver.ca/files/cov/equity-framework.pdf>

3. **Accessible communication for people with disabilities:** This policy does not currently address language accessibility standards for individuals who may use American Sign Language, Braille or Augmentative and Alternative Communication.³
4. **Local Indigenous languages:** Guidelines and standards for the use of hən̓q̓əmin̓əm̓ and Skwxwú7mesh languages will require further engagement with xʷməθkʷəy̓əm Indian Band, Skwxwú7mesh Nation, and səliwətaʔ Nation. The use and visibility of these languages will be given special consideration as the languages of the Indigenous rightsholders in these territories, the xʷməθkʷəy̓əm, Skwxwú7mesh, and səliwətaʔ Peoples.
5. **Additional limitations:** While this policy generally addresses public-facing information, the following areas of information will be exempt from this policy: human resources, legal (including bylaws), procurement, and other documents where the primary audience is not the public.

DEFINITIONS

Auto-translation	Software or digital platform that converts, using artificial intelligence, written content from one language into another in place of a professional translator.
Awareness-building information	City information that is intended to build general awareness with little to no expectation of further action by the public.
CEC	The City's Civic Engagement and Communications Department.
Compliance / regulatory information	City information to facilitate compliance with a City bylaw, where non-compliance with such bylaw may have material adverse consequence (such as taxes, fines, fees, or withholding of services).
Critical information	City information that could impact the immediate and direct health and safety of the public, including information about the sudden disruption of critical City services.
Critical City services	City infrastructure and operations that must be maintained, and without which serious injury, loss of life and/or destruction of infrastructure may result.
Equity	A practice aimed at achieving fairness by treating people differently based on a context of need, opportunity, circumstance and consideration of historic and structural inequities. Equity is also an outcome in which people,

³ Guidelines on communications for people with disabilities should be developed in the future to align with legislation from other levels of government and with the City's Accessibility Strategy.

	particularly those facing the greatest barriers, can access City services without impediment.
hənqəmiḥəm	hənqəmiḥəm is the original language of the lower reaches of the what is now known as the Fraser River spoken by the Musqueam and Tseil-Waututh Peoples, and many others.
Home language(s)	The language(s) a person speaks most often at home and/or the language in which they feel most comfortable, as defined by Statistics Canada.
Individuals with limited English proficiency	Individuals who have a limited ability to read, speak, write and/or understand English.
Interpretation	Oral (spoken) transmission of information from one language into another language. The source of the content can be spoken or written.
Language access	Using translation, interpretation and other methods, such as universal icons or graphics, to reduce the barriers for people with limited proficiency in English to access information and services.
Localized/ Neighbourhood-level	City services and programs that are specific to an area or a neighbourhood (not citywide).
Participatory information	City information intended to encourage the use of City services, participation in activities or changes in behaviour.
Professional translation	The conversion of written content from one language into another language by a person who is a professional translator. Note: for Indigenous languages, translations may be provided by a person or group of people (such as language keepers or Elders).
Quality assurance	Review and proofreading of the translated content to ensure that: a) the document accurately reflects the content and tone of the original document, while being culturally appropriate; b) terminology is used consistently; and c) there are no typographical or formatting errors.
Sḵwxwú7mesh	Sḵwxwú7mesh is one of 10 languages that belong to the Coast Salish languages branch, and spoken by the Squamish People.

Translation	The conversion of written content from one language into another language(s).
-------------	---

POLICY STATEMENTS

1. Roles and responsibilities

The City of Vancouver aims to provide information and services in a manner that is reflective of the City's linguistic diversity, and in accordance with this policy.

1.1. Civic Engagement and Communications (CEC) is responsible for:

- 1.1.1. Developing an internal communications approach for this policy
- 1.1.2. Advising City departments with language access implementation
- 1.1.3. Providing advice and support to build internal capacity within City departments
- 1.1.4. Monitoring implementation of the policy

1.2. City departments are responsible for:

- 1.2.1. Developing and implementing internal processes for embedding language accessibility in planning and operations
- 1.2.2. Assessing the language access needs for public-facing services or programs offered as per this policy
- 1.2.3. Determining the necessary budget and staff resources for language access in their annual work plan and/or project plans
- 1.2.4. Assisting with the collection of key metrics in coordination with Civic Engagement and Communications

1.3. All staff are responsible for:

- 1.3.1. Familiarizing themselves with this policy and related best practices
- 1.3.2. Applying this policy, where feasible, in their public-facing work

2. Information categories and geographic distribution

2.1. Critical information intended for:

- **City-wide** distribution shall be professionally translated into the home languages used by **0.5% or more**⁴ of residents in the city as indicated by the latest census data available.

⁴ Based on 2021 Census data, this equates to Vancouver's 12 most commonly used home languages, which includes English, Traditional Chinese, Simplified Chinese, Tagalog, Spanish, Punjabi, Vietnamese, Farsi, Korean, Portuguese, French and Japanese.

- **Localized/neighbourhood-level** distribution shall be professionally translated into the home languages used by **1.0% or more⁵ of residents of the area**, as indicated by the latest census data available.
- 2.1.1. Efforts should be made to release translations at the same time. However, in an emergency, information may be communicated immediately in English and translations should be provided as soon as they become available.
 - 2.1.2. A **translated summary** may be provided in place of a full translation, if the summary contains enough information for an individual to understand the purpose, impact or actions required.
 - 2.1.3. Translations for critical information shall be reviewed for **quality assurance** through a process developed by Civic Engagement and Communications.
- 2.2. **Compliance/regulatory information** intended for:
- 2.2.1. **City-wide** distribution shall be professionally translated into the home languages used by **2.0% or more⁶ of residents in the city** as indicated by the latest census data available.
 - 2.2.2. **Localized/neighbourhood-scale** distribution shall be professionally translated into the home languages used by **2.0% or more of residents of the area**, as indicated by the latest census data available.
 - 2.2.3. A **translated summary** may be provided in place of a full translation, if the summary contains enough information for an individual to understand the purpose, impact or actions required.
 - 2.2.4. **Auto-translation** of compliance/regulatory information may only be used if all of the following circumstances are met:
 - The content is being shared for informational purposes only (e.g. background information)
 - The content is being shared on a digital platform to be used in tandem with auto-translation software
 - The format of the content (i.e. file type) is compatible with the auto-translation software.⁷
 - 2.2.5. Translations for compliance/regulatory information shall be reviewed for **quality assurance** through a process developed by CEC.

⁵ Home languages at the localized scale will vary, please refer to the Neighbourhood Home Language Data Table.

⁶ Based on 2021 Census data, this equates to Vancouver's seven most commonly used home languages, which includes English, Traditional Chinese, Simplified Chinese, Tagalog, Spanish, Punjabi and Vietnamese.

⁷ For example, some auto-translation software programs are not compatible with PDFs, graphics and web forms on vancouver.ca

2.3. Participatory information intended for:

- 2.3.1. **City-wide** distribution should be professionally translated into the home languages used by **2.0% or more** of residents in the city as indicated by the latest census data available.
- 2.3.2. **Localized/neighbourhood** scale distribution should be professionally translated into the home languages used by **2.0% or more** of residents of the area, as indicated by the latest census data available.
- 2.3.3. A **translated summary** may be provided in place of a full translation, if the summary contains enough information for an individual to understand the purpose, impact or actions encouraged.
- 2.3.4. **Auto-translation** may only be used if all of the following circumstances are met:
 - The content is being shared for informational purposes only (e.g. background information)
 - The content is being shared on a digital platform to be used in tandem with auto-translation software
 - The format of the content (i.e. file type) is compatible with the auto-translation software.
- 2.3.5. Translations for participatory information should be reviewed for **quality assurance** through a process developed by CEC.

2.4. **Awareness-building** information is encouraged to be professionally translated, particularly where the information has a greater impact and auto-translation is not available.

- The recommended threshold for **city-wide** distribution is home languages used by **2.0% or more of residents in the city**, as indicated by the latest census data available.
 - The recommended threshold for **localized/neighbourhood** distribution is home languages used by **2.0% or more of residents of the area**, as indicated by the latest census data available.
- 2.4.1. A **translated summary** may be provided in place of a full translation.
 - 2.4.2. If professional translations are not available, **auto-translation** may be used provided all of the following circumstances are met:
 - The content is being shared on a digital platform to be used in tandem with auto-translation software
 - The format of the content (i.e. file type) is compatible with the auto-translation software.
 - 2.4.3. Staff are encouraged to have translations reviewed for **quality assurance** through a process to be developed by CEC.

- 2.5. Public-facing planning documents may fall into one or more of the information categories outlined above. In determining the applicable category, staff should consider all relevant circumstances and factors, such as level of impact, intended audiences and how people would interact with the information provided.
- 2.6. For all other types of information and geographic distribution not covered above, the department shall assess whether translation is necessary to improve access to City services, in consultation with CEC as needed.

3. Discrepancies in Translations

Translations are provided as a convenience to individuals with limited proficiency in English. In the case of any discrepancies, the original English-language content will prevail.

4. Home languages

- 4.1. The top home languages applicable to this policy will be determined as per the latest census data available. For the list of top home languages, please refer to the [Quick Reference Table](#) (see Appendix A) or the Neighbourhood Home Language Data Table.
- 4.2. To respond to emerging needs, departments may offer translations in additional home languages beyond what is required by this policy.
- 4.3. Given that English and French are the official languages of Canada, City departments may provide French translations, beyond the requirements of this policy, for provincial, federal or international audiences, or as deemed necessary by a department.

5. hən̓q̓əmiñəm and Skwxwú7mesh languages

At this time, this policy is not recommending that staff seek translations in hən̓q̓əmiñəm and Skwxwú7mesh languages. The City recognizes the ongoing struggle for survival and revitalization of local Indigenous languages. To develop standards for local Indigenous languages, future engagement will be required with x̣ẉməθḳẉəỵəm, Skwxwú7mesh, and sə̣ḷiḷẉətạ Nations.

- 5.1. If translations into hən̓q̓əmiñəm and Skwxwú7mesh are deemed necessary and appropriate, staff must work with the Indigenous Relations department at the City of Vancouver to seek permission from the Nations.
- 5.2. When working with hən̓q̓əmiñəm and Skwxwú7mesh languages, staff must present those translations accurately and respectfully (e.g. correct font, orthography and terminology).

6. Further considerations

- 6.1. This policy should aim to align with accessibility standards adopted in similar policies of senior levels of government.
- 6.2. City staff should use plain language to make content more accessible for individuals at all English proficiency levels. Visual representation, such as images and infographics, may also be provided to make content more accessible.
- 6.3. Recognizing that not all home languages will be reflected in this policy or for all audiences, departments should consider the language accessibility needs of additional groups, such as businesses, community organizations, newcomers, and workers who live outside of the city.
- 6.4. Recognizing that the City often shares culturally significant topics, departments should consider translating content into the languages reflecting the respective cultural groups.
- 6.5. Staff should consider cultural norms and differences when developing and designing content for translations.
- 6.6. To better reach linguistically diverse communities, staff should consider sharing translated content in ways that reflect the communication preferences of those communities.

Reference Documents

[Language Access Policy - Quick Reference Table](#)

Neighbourhood Home Language Data Table

RELATED POLICIES

- [Access to City Services without Fear Policy \(COUN-003\)](#)
- [Advertising Policy \(AG-010-01\)](#)
- [Community Relations - Intercultural & Race Relations \(AG-001-01\)](#)

APPROVAL AND REVIEW HISTORY:

Version 1 approved by:	Civic Engagement and Communications General Manager	6/14/2023
	City Manager	6/14/2023

Next review date 6/13/2025

Appendix A: Language Access Policy - Quick Reference Table (June 2023 version)

What do I need to translate?		
Information Categories	Citywide	Localized*
<p>Critical Information that will or may impact the immediate and direct health and safety of residents, and/or sudden disruption of the City's critical services. Examples: extreme weather warnings, emergency alerts.</p>	0.5% or more of home languages	1.0% or more of home languages
<p>Compliance / Regulatory Information to help follow regulations or bylaws, which may have direct consequences. Examples: taxes, fines, fees, or withholding core services.</p>	1.0% or more of home languages	2.0% or more of home languages
<p>Participatory Information that is intended to encourage use of City services, participation in activities, or changes in behaviour. Examples: engagement surveys, joining events or programs</p>	1.0% or more of home languages	2.0% or more of home languages
<p>Awareness-building Information that is intended to build general awareness without the expectation of further action by the public. Examples: notice of holidays, promotional/marketing</p>	Recommend 1.0% or more of home languages	Recommend 2.0% or more of home languages
<p>Other For all other types of information or situations not captured above, the department will assess if translation is needed, CEC to advise as needed</p>		
<p>*Localized: Refers to smaller geographic scales, such as local planning area(s), but larger than blocks or intersections. Refer to Neighbourhood Home Language Data Table.</p>		
Home Languages Citywide (2021 Census)	Population	% of Pop.
Traditional Chinese (TCH)	56,445	8.6%
Simplified Chinese (SCH)	30,925	4.7%
Tagalog	10,835	1.7%
Spanish	8,600	1.3%
Punjabi	8,505	1.3%
Vietnamese	7,755	1.2%
Farsi	5,550	0.8%
Korean	5,100	0.8%
Portuguese	3,995	0.6%
French	3,955	0.6%
Japanese	3,620	0.6%
<p>Additional languages may need to be included, if a specific need has been identified.</p>		
Further Considerations		
<ul style="list-style-type: none"> • Create a summary of key need-to-know details for shorter and faster to read translations • Write in plain language so that everyone can understand easily • Use visuals (e.g. infographics) to better explain ideas • Consider language needs of additional groups (businesses, community organizations, workers living outside of the city) • Seek to understand cultural norms and preferences • Auto-translation can be helpful but has limitations 		
<p>Please refer to the full Language Access Policy for more details, or visit the Currents page</p>		