

Chief Constables' Council

Title: Regulating, Standardising and Professionalising Language Services through the Police National Framework by Creating Police Approved Interpreters and Translators (PAITs)

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1. INTRODUCTION

- 1.1. Traditionally, dating back to the National Agreement of 2007, the National Register of Public Service Interpreters (NRPSI) has been seen by police services across the UK as an independent body that regulates the language professionals deployed to police assignments.
- 1.2. As market forces have influenced procurement practices and police budgets have been reduced, the need for forces to ensure high standard interpreting and achieve value has led to the practice of awarding language service contracts to language service providers (LSPs) rather than the protracted practice of individual police officers making multiple phone calls to interpreters on an authorised list in order to secure their attendance.

2. RISKS TO POLICE FROM CURRENT PRACTICE

- 2.1. The NRPSI register is voluntary. Many interpreters now are registered with LSPs rather than with NRPSI. By only using NRPSI registered interpreters, the pool available for police use is reduced by well over 50%, which will impact on fulfilment.



- 2.2. Wording around police practice and guidance is unclear as to whether police 'should' or 'must' use NRPSI registered interpreters. This could lead to judicial arguments and the potential loss of cases at court if the defence seize on the fact that an interpreter or translator was not on the NRPSI register.
- 2.3. Whilst NRPSI interpreters are subject to a code of conduct and may be disciplined resulting in removal from the register, the LSPs and police are not made aware of this due to a lack of current information sharing and the resulting risk to current and future prosecutions is high. Interpreters are also subject to LSP codes of conduct. None of which meet the specific needs of police assignments.
- 2.4. The National Police Framework for Language services is modelled on the exclusive use of LSPs to deploy interpreters to police assignments. Continued media and news reports are being distributed by NRPSI, stating (inaccurately) that police are accepting lower qualified and experienced interpreters due to the involvement of LSPs. Over time, this could engender a lack of confidence in police prosecutions involving interpreters. There is a need to ensure the integrity of the new Police Framework and secure its reputation as fit for police use from the outset.
- 2.5. The NRPSI Registrant checks that interpreters have the correct qualifications, vetting and experience, but they do not authorise any of these. They are the final link in the journey of an interpreter to becoming approved for police use. It is unnecessary, as LSP's check all of these requirements when on-boarding a new linguist irrespective of whether they are NRPSI registered or not. It is an extra step that adds no value for the language professionals as NRPSI do not act as a Language Service Provider or assign them to police deployments.
- 2.6. Some forces across the country have already removed the NRPSI requirement from their policies, indicating a lack of confidence in the register as a suitable 'independent' regulatory body for police use. There is a need for a consistent approach across the country to prevent confusion, particularly as forces begin to procure regionally on the National Police Framework.

3. PROPOSAL

- 3.1. The introduction of a police specific procurement framework for language services, provides a timely opportunity for the police service to take full control of language services.
- 3.2. A new category of **Police Approved Interpreter and Translator (PAIT)** is proposed with the following advantages:
 - 3.2.1. No requirement for linguists to be on a voluntary register. The National Police Contract Manager will hold a full list of all approved interpreters and translators.
 - 3.2.2. All language professionals will be bound by the Police Code of Ethics, as they are deemed 'contractors'.
 - 3.2.3. Conduct matters and poor practice by language professionals investigated by LSPs will be overseen by the National Police Contract Manager, thus ensuring an interpreter expunged from one LSP list will be expunged from all lists (and no longer be able to work for police). It will be conducted in consultation with Warwickshire Police Vetting Unit to ensure intelligence and disciplinary outcomes are shared with all stakeholders. Police investigations will remain independent but conclusions should be shared with the National Police Contract Manager to ensure the integrity of future prosecutions.
 - 3.2.4. Training, guidance and information sharing will be coordinated on a national basis across all LSPs and all linguists.
 - 3.2.5. One single ID card will be made available to all approved interpreters and translators who hold PAIT status.

- 3.3. The proposals above are designed to meet the needs of modern policing requirements and will ensure the professionalisation and standardisation of police interpreters and translators across all forces.
- 3.4. There will be resistance from a minority of interpreter pressure groups, who will see the PAIT as a move away from independent review and regulation, but the fact is that NRPSI was only ever a voluntary register with a slowly reducing membership. The PAIT system is independent of commercial and political influence.
- 3.5. The police will regulate the use of language professionals. The police are, and always will maintain independence in their dealings with the public, employees and contractual obligations.
- 3.6. The PAIT system is designed to regulate language professionals for police use and ensure the integrity of all investigations, prosecutions and other interactions with non-English speaking or deaf people who come into contact with police.

4. ASSURANCE

- 4.1. The PAIT system will ensure the integrity of all language professionals used for police assignments through:
 - 4.1.1. Highest standards of interpreting set by the requirement for NPPV3 vetting, DPSI or DPI qualification and a minimum number of hours public service interpreting experience before gaining approval.
 - 4.1.2. Similar standards for qualifications, vetting and experience will be set for translators and transcribers, as well as for non-spoken (BSL) interpreters.
 - 4.1.3. Standardised information sharing between police forces, interpreters, LSPs and vetting agencies.
 - 4.1.4. Suitable conduct and behaviour code based on independent review and oversight, linked with sharing to all stakeholders as described above.
 - 4.1.5. Enhancement of the status of police linguists through the title of 'Approved' Police Interpreter and Translator.
 - 4.1.6. More effective regulation of Language Service Providers by police through auditing and information sharing to ensure the service they provide meets the needs of the police forces.

5. DECISIONS REQUIRED

- 5.1. Council is asked to:
 - i. Support the proposal to develop a Police Approved Interpreter/Translator (PAIT)
 - ii. Mandate that language professionals deployed to police assignments no longer require to be on the National Register of Public Service Interpreters (NRPSI), so long as they are on the PAIT register.
 - iii. Mandate that all future documentation relating to police use of language professionals (National Police Framework, Authorised professional Practice etc.) omits any reference to NRPSI requirements and instead refers to the PAIT system.
 - iv. Confirm that the PAIT system replaces the 2007 Agreement on police use of Linguists.

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