

National Police Language Services Update - March 2021

Contents

- Introduction
- Governance Structure
- Procurement Update
- Regional progress
- PAIT Scheme Update
- PAIT Roll Out
- Senior Responsible Owner Decisions
- Code of Conduct
- Discipline Process
- Other Updates
- Fake Interpreter Case/Actions

Introduction

Welcome to the first of what we hope will become regular National Police Language Services update.

This may be a long update as we explain the journey we have taken and where we are currently. It is hoped that future updates will be shorter as the policies and procedures for procuring language services and working with interpreters and translators progresses and you all become more familiar with them in practice.

Governance Structure

A formal Governance Structure was agreed by Chief Constable Simon Cole QPM, who is the NPCC National Portfolio Lead for Police Language Services.

The structure is shown at the rear of this newsletter. The Independent Advisory Group members have received invites and all meetings shown on the structure chart either have, or are scheduled to commence in March and April.

An Action Plan for National Police Language Services 2021/2022 is in the final stages of approval and will be circulated once finalised.

Procurement Update

The National Police Dynamic Procurement System for Language Services was launched in September 2020 and is in place until September 2027. It has been designed to meet the exacting needs of all police forces in England, Scotland and Wales.

Four Regions are currently in the process of procuring Language Services from the DPS:-

- **Midlands Region**

Leicestershire, West Midlands, Lincolnshire, Nottinghamshire, Northamptonshire, Warwickshire, West Mercia, Derbyshire & Staffordshire

- **South East Region**

Sussex, Surrey, Hampshire & Thames Valley

- **North West Region**

Greater Manchester, Merseyside, Cheshire, Lancashire Cumbria & North Wales

- **London Region**

Metropolitan Police & City of London Police

- **East Region about to commence supplier Engagement**

Essex, Kent, Bedfordshire, Cambridgeshire, Hertfordshire, Norfolk, Suffolk

Police Approved Interpreters and Translators (PAIT) Update

The PAIT Scheme was launched in November 2020. It provides a system for police to regulate interpreters and translators, sets standards and specifications to ensure that police receive the highest qualified and experienced interpreters and translators when required.

An explanatory document can be found on the National Police Language Services website ([National Police Dynamic Purchasing System for Language Services \(npcc.police.uk\)](https://npcc.police.uk)) for those who have no knowledge of the scheme.

Here are the latest updates for the PAIT Scheme:

Work has continued to define what the PAIT Scheme should include. In particular, we are working to set an exacting specification for all forms of interpreting and translation that allows for flexibility, provides the largest possible pool of qualified, vetted and experienced interpreters and translators, whilst still allowing for the fall-back of an Inspector's authority if a suitable interpreter cannot be sourced.

There has been ongoing consultation with all stakeholders, including Language Service providers (LSPs), The Chartered Institute of Linguists (CIOL), Interpreter Representative Groups, Voluntary representative bodies such as The National Register of Public Service Interpreters (NRPSI) and The National Register of Communication Professionals for Deaf/Deafblind People (NRCPD), as well as a number of individual interpreters.

The PAIT Scheme comes into effect on 1st April 2021. Here is the approved roll out timeline:

Spoken Language Face to Face Interpreters	1st April 2021
British Sign Language BSL (& other Non-Spoken interpreting disciplines)	1st October 2021
Translators and Transcribers	1st April 2022
Telephone Interpreters	1st October 2022

The specification allowing a spoken language interpreter or translator to be approved as a PAIT is being finalised and will be circulated in a subsequent update.

A number of decisions have been made regarding the PAIT Scheme and they are reproduced below:

A deaf person coming into contact with police in any circumstances, would expect a BSL interpreter to hold a yellow badge, indicating they are on a national register. As this is so well known in the deaf community, a deaf person would not have confidence in an interpreter who did not produce the yellow badge.

D4. NRCPD will be a mandatory requirement for a BSL interpreter under the PAIT Scheme.

Ensure continued confidence of deaf/deafblind community in BSL Interpreters used for police assignments

The circumstance described in relation to NRCPD, is not replicated for NRPSI. A person requiring spoken interpretation, would in all probability be unaware of NRPSI. There is a further complicating factor that the pool of NRPSI interpreters is lower than the number of qualified, vetted and experienced interpreters available for police assignments.

By Mandating NRPSI as a requirement would limit those available in the pool. We continue to work with NRPSI to ensure the PAIT Scheme is acceptable to all forms of interpreting and translating.

D5. NRPSI will not be a mandatory requirement for spoken language PAIT interpreters.

Ensures no reduction in pool of available interpreters for police assignments.
All NRPSI assurance checks are conducted by DPS Approved LSPs with further assurances provided through regular DPS Audits.

Two exemptions have been developed that are available to police forces if the circumstances are applicable.

D6. Those police forces with a current language services contract expiring prior to 1st April 2022 may be exempt from the PAIT Scheme so long as they conduct a risk assessment as to how they are ensuring quality of language services in the interim. Entry to be made in the force risk register and copied to the National Police Contract Manager for Language Services.

Provides extra time for forces and LSPs to prepare for PAIT compliance by 1st April 2022

D7. Any force without a language services contract may be exempt from PAIT in order to continue with local arrangements for interpreters and translators, so long as they conduct a risk assessment as to how they are ensuring quality of language services in the interim. Entry to be made in the force risk register and copied to the National Police Contract Manager for Language Services.

Provides extra time for forces and LSPs to prepare for PAIT compliance by 1st April 2022

Code of Conduct

A PAIT Code of Conduct is being developed to ensure any interpreter or translator undertaking a police assignment is aware of how they are expected to conduct themselves.

This is in addition to the agency code of conduct, an NRCPD or NRPSI code of conduct they may have signed up to.

Additionally any person undertaking work for a police service (including interpreters and translators) is subject to the Police Code of Ethics. Obviously not every aspect of that code is applicable to contractors.

The code can be read here: [Code of Ethics | College of Policing](#)

Discipline Processes

Unfortunately, in the past it has been possible for an interpreter to be struck off a register or agency approval list, but for that person to still obtain work with another agency. The information sharing protocols were not in place to allow a police service to share information about an interpreter or translator with an agency, or vice versa. Agencies did not share information of a discipline nature between themselves.

The PAIT Scheme includes an information sharing protocol that allows for all agencies that are approved as suppliers to police forces, to share discipline information. Leicestershire Police will hold a master list of all approved interpreters and translators and will oversee all discipline, consulting with Warwickshire Vetting Unit where necessary to ensure the integrity of all police investigations involving interpreting or translating. The documentation is being finalised and will be shared in a later newsletter.

Other Updates

Fake Court Interpreter

You may be aware of a recent court case involving an interpreter who was charged with Fraud after being paid for 140 court case interpreting/translation assignments that he was not qualified to accept.

<https://www.independent.co.uk/news/uk/crime/court-interpreter-fake-mirwais-patang-b1801634.html>

CC Cole wrote to NPCC Colleagues updating on the number of actions put in place to ensure that agencies are checking interpreter's and translator's documentation correctly. These actions include:

- Ensuring original documents are checked wherever possible for all interpreters and translators
- Re-circulate to all LSPs the information document from CPNI on how to identify fraudulent documentation
- 10% dip sample by LSPs of all police interpreters to ensure rechecking of qualifications/ vetting/right to work in UK

- The next round of LSP audits on the DPS will commence in August this year and will include suitable checks are made to ensure compliance
- All interpreters **MUST** be issued with an ID card that has a full face photograph of the interpreter which is less than 18 months old (allowing for at least a yearly replacement)
- Reminder for all police staff to check credentials of any interpreter and translator carefully and if necessary confirm with the LSP if there are any doubts.

Ian Fraser
Head of Procurement and Support Services
Leicestershire Police

Mark Lewis
National Police Contract Manager for Language Services
Leicestershire Police

March 2021

National Police Language Services Governance Structure

