

National Police Language Services Update – April 2024

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Introduction

Welcome to the Sixth update from the Police Dynamic Purchasing Solution (DPS) and the PAIT Scheme.

NPCC Lead for Language Services

The National Police Chiefs' Council (NPCC) selected a new National Lead to replace Chief Constable Simon Cole, who retired in March 2022.

Assistant Chief Officer Paul Dawkins from Leicestershire Police was appointed as the new lead. ACO Dawkins has the same passion for language services as CC Cole had and is already championing a number of new initiatives such as providing deaf awareness training to all police officers and staff in England & Wales.

Procurement

All police forces in England and Wales, with the exception of South Wales, Gwent and Dyfed-Powys are now utilising the Dynamic Procurement Solution.

Map 'A' at the end of this newsletter provides details of the police regions.

Map 'B' shows which LSP currently holds the contract in each region.

All police forces in England & Wales comply with the PAIT Scheme

Police Approved Interpreters and Translators

PAIT List

The PAIT List currently stands at 2314 individually named interpreters and translators. Thank you to each of you for agreeing to join the scheme and accept police assignments. We in the police are unable to do our job without your help.

Unfortunately 15 interpreters have already had NPPV3 vetting revoked since January 1st this year. Fortunately we have more interpreters joining us than leaving or being removed, but we really don't want to see any more having vetting revoked. Please read the vetting section below for more information on this subject.

Changes to PAIT Registration

When PAIT first started, there was a provision for an interpreter to be admitted to the scheme so long as they had submitted all relevant documentation to start their NPPV3 vetting process. The number of interpreters failing vetting was so low, that it was deemed by National Police Chiefs' Council to be a very low risk to policing. Since March of this year, that decision has been reviewed.

The percentage of interpreters being refused vetting has doubled in recent years and therefore it has been necessary to ensure that new interpreters to the PAIT List hold a current NPPV3 vetting BEFORE they are permitted to take assignments as a PAIT interpreter. They may still be used as a Non-PAIT interpreter (with all the associated checks being conducted and an Inspector authorising each assignment).

I hope you understand the reasoning behind this decision, which was not taken lightly.

Reminder Regarding PAIT Registration

You may be required to confirm your qualifications, experience and vetting with your LSP before they submit your details. Regardless of which membership organisation you may belong to, the LSP has an obligation under their contract with police to ensure all PAIT interpreters have had their details checked and verified.

I hope you will bear with the linguist recruitment department of your chosen supplier as they undertake the requirements of the DPS.

I am aware that the NRPSI are still willing to send letters to LSPs confirming that they have checked the experience of the named interpreter, if you are on the NRPSI Register. I would like to thank NRPSI for their assistance in this regard.

Compliance with GDPR/Data Protection

Please ensure you update your registered LSPs with your current name and address. I am still seeing instances of interpreters having different addresses registered with different LSPs. I also see interpreters registered with one LSP with what I assume are maiden names and then married names with another LSP.

Please ensure all your data is recorded correctly so that no one falls foul of the GDPR regulations.

Other Updates

Interpreting for Solicitor Consultations

I would like to provide a detailed update on this matter.

In 2020 the College of Policing (CoP) published detailed guidance stating that an interpreter should not be left alone with a victim, witness or suspect. This meant, an interpreter should not be with any of those persons without a member of the police service being present. The CoP guidance was not sufficiently specific, so NPCC added further guidance stating telephone interpreting should be used for solicitor consultation, so that the interpreter was not left in a room with the suspect and solicitor.

The Law Society have made representation regarding this policy, which is currently being

reviewed. I will be meeting with the CoP later in April to try to get detailed and final guidance on this matter.

Across the country, police forces are working to comply with the guidance (which is NOT new, but has only recently been observed by some forces). Some custody suites are equipped for telephone interpreting whilst others are not.

The CoP and NPCC Guidance is just that – guidance. It is not enshrined in law.

The only legal requirement for use of interpreters comes from the Codes of Practice Annex 'N' to the Police and Criminal Evidence Act (PACE), which states that a police inspector will decide whether an interpreter needs to be physically present, or whether a remote interpretation service may be provided. This must be done on a case by case basis.

In the meantime, I provide the following guidance for you:

If the police officer asks you to interpret for the solicitor consultation, and you are happy to do so, ensure that all notes you take during the consultation interview are handed to the solicitor at the conclusion of the consultation. You are reminded that you are subject to the same legal privilege as the solicitor, in that you may not disclose anything said during the interview to any other person (especially not the police). So if you hear something in interview that differs from what was said during consultation, you must not disclose this to any person.

I will provide further updates as I get them.

Vetting Requirements

I wanted to highlight some of the issues I am seeing regarding NPPV3 vetting conditions.

If you are going outside the UK for any length of time (other than for a holiday) please ensure you inform your Vetting Officer. NPPV3 is not applicable whilst you are outside the UK. This means that you are not permitted to undertake any assignment that requires NPPV3 whilst away. So for example, undertaking translation or video remote assignments for police is not permitted while you are outside the UK.

I have seen that a few interpreters have had NPPV3 revoked recently because they did not disclose that they are living or working outside the UK.

The second issue regarding NPPV3 is that you are required to inform your registered agency and any register or membership organisation as soon as your NPPV3 vetting is revoked or suspended. Regardless of whether or not you intend to appeal the decision, you must inform PAIT, NRPSI, AIT or APCI as soon as you are informed that your vetting is no longer valid.

Unfortunately, I have had to invoke discipline processes through NRPSI in relation to a number of interpreters who continued to show a current NPPV3 privilege on the public facing NRPSI Register, despite them having their vetting revoked (in some instances, for many months). This is unacceptable. Please ensure you comply with all the conditions of your vetting. This includes updating your home address, change of name and change of circumstances regarding who you reside with and changes to close family members. You do not fail vetting for informing them of facts, but you may fail for not informing them.

Integrity Issues

Following on from the vetting issues above. I am aware of a practice being conducted in some police regions where interpreters are asking police officers to add extra time to the end of their bookings when the assignment finishes.

The terms of contracts for language services differ slightly across the UK, with some forces paying the booked duration, regardless of whether it finishes earlier, whilst other contracts state that police only pay for the actual time the interpreter was present. What this means is that on some regions, if you are booked for six hours, but only work for three, you only get paid for the three you worked, even though you might have forgone other work to attend that booking. I do not agree with these conditions and am working closely with police forces to ensure that future contracts are fairer to interpreters.

Having said all that, it is a criminal offence for you to ask a police officer to commit fraud.

One interpreter was charged with fraud in April and received a caution and monetary fine for altering their timesheet following a police assignment. They will never be allowed to undertake

police assignments again in the UK. It really isn't worth it. Police will take robust action against such behaviour.

Another practice I have been made aware of is, that some interpreters are attending police stations and recommending specific defence solicitor companies to detained persons. The PAIT Code of Conduct, NRPSI Code of Conduct and the Police Code of Ethics, all require you to remain independent. You are also there at the request of the police, not the detained person. You may not provide them with any guidance advice or support other than to faithfully interpret everything said during the assignment. This practice puts your impartiality and integrity in serious doubt.

Police Custody Suites have audio and visual recordings. A number of incidents of interpreters recommending a solicitor to a suspect are currently under investigation and appropriate action will be taken.

Publicising Your PAIT Number

I still receive regular requests from interpreters asking to publish their PAIT Number.

I am sorry, but the answer is always 'No'. I do appreciate that you have worked hard to achieve PAIT Status and that you are rightly proud of this achievement. The PAIT number is for Approved Suppliers and Police to use. It should not be added to email signatures or publicised in any way. There is always a security concern for any person providing services to police forces. Keeping this information out of the public domain is a way of mitigating any potential risk.

BSL CPD

I am working with various Agencies to provide police specific CPD for British Sign Language interpreters. I am acutely aware that whilst spoken language interpreters can obtain formal training through police and court pathways within their qualifications, BSL interpreters have no police-specific modules within their formal training.

I often hear comments that BSL interpreters feel ill-equipped to undertake police assignments, hence the CPD events.

I must stress, that these sessions are expensive for NPCC to run. I need to hire meeting rooms, provide food and refreshments as well as travel around the UK, therefore these are **not** to be seen as just days for interpreters to obtain their CPD hours at no cost. They are designed to accommodate BSL interpreters who have a desire to onboard with a supplier and undertake police bookings, or are already doing so and want to refresh their understanding of police procedures.

Finally:

Although some of the items in this newsletter may seem negative, it is important to remember that over 2300 PAIT interpreters are doing an absolutely superb job for police and are incredibly dedicated and professional in their approach to police interpreting. The less positive comments above, relate to a very small minority who are, and will continue to be, dealt with appropriately.

Thank you to those interpreters and translators who continue to take police assignments and assist us in our investigations. We cannot do so without your help and we, the police, appreciate what you do on a daily basis for us. If you are reading this newsletter and you do not currently take police assignments, please consider doing so.

Paul Dawkins
Assistant Chief Officer Leicestershire Police
NPCC Lead for Language Services

Mark Lewis
National Police Contract Manager for Language Services
Leicestershire Police

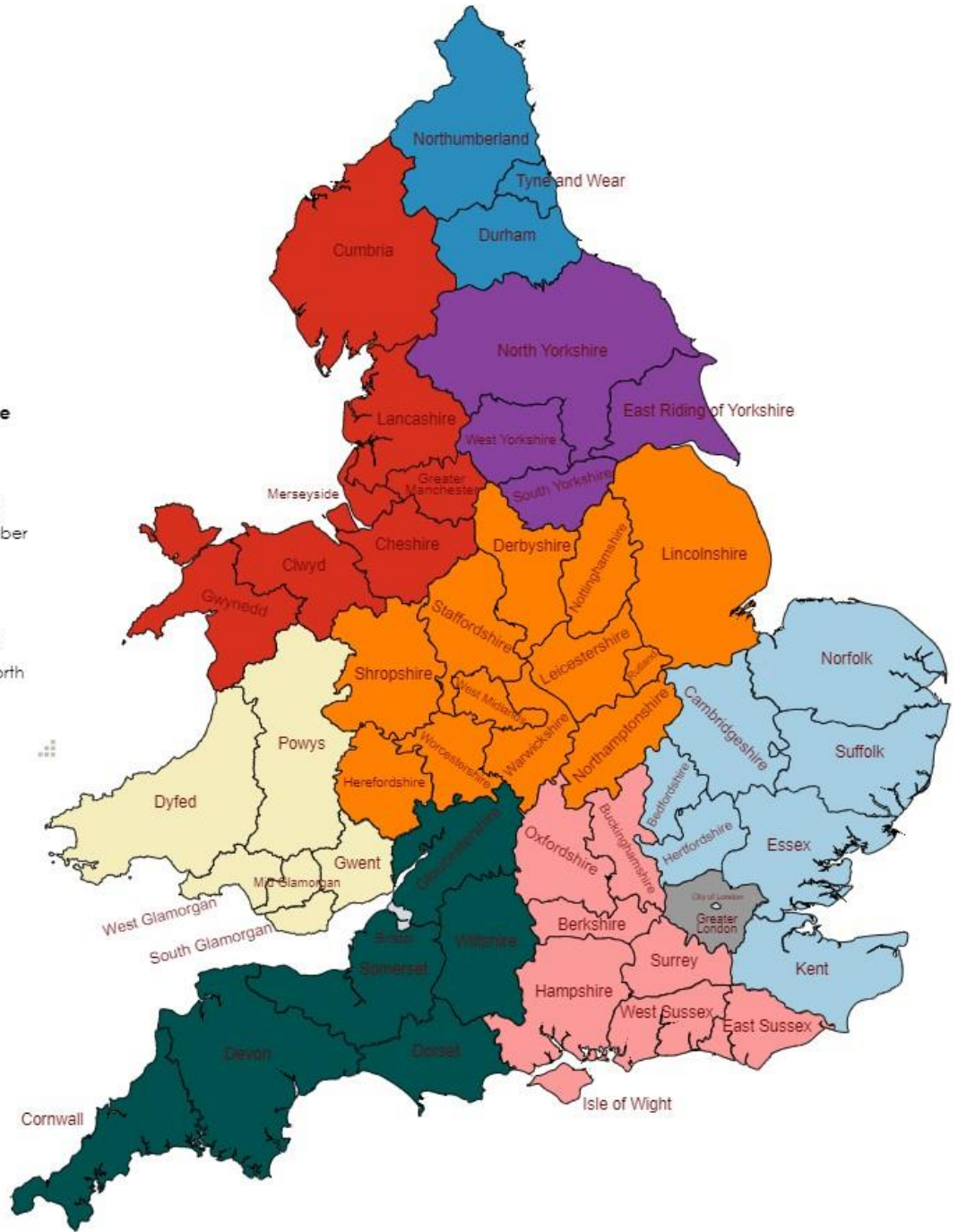
April 2024

To contact us regarding Police Language Services, email pait@leicestershire.pnn.police.uk

Map 'A' Police Regions

England & Wales Police Regions for DPS

- North East England
- North West England
- Yorkshire & the Humber
- Midlands
- East of England
- South of England
- South West England
- Wales (Excluding North Wales)
- London



Map 'B' Service Providers

Service Providers as of December 2023

- thebigword
- Cintra
- Language Line TI
- Welsh Interpreting and Translation Services (WITS)
- Language Line Solutions for Telephone Interpreting Metropolitan Police In-House Services for F2F & Trans
- D A Languages
- Language Line Solutions

