

NATIONAL REGISTER OF PUBLIC SERVICE INTERPRETERS

Chief Constable David Shaw and Chief Constable Andy Parker
West Mercia and Warwickshire Police Alliance
PO Box 487
Shrewsbury
SY2 6WB

6th August 2012

Dear Chief Constable Shaw and Chief Constable Parker

Ref: Interpreting Services

The National Register for Public Service Interpreter (NRPSI) have come to the knowledge, that your Police Alliance is in the process of reviewing your translation and interpretation service. We understood that you are making considerations to enter the Framework Agreement (FWA) and contracting with Applied Language Solutions (ALS).

NRPSI would like to express grave concerns over the Police Alliance decision to consider a contract with ALS. Clear evidence shows that the current FWA is not working, giving rise to miscarriages of justice and delays in the Courts.

Introduction

The National Register for Public Service Interpreter (NRPSI) is the UK's independent voluntary regulator for the interpreting profession. NRPSI maintains a register of professional, qualified and accountable public service interpreters. The Register is currently made up of over 2,200 interpreters in 101 languages.

The Ministry of Justice (MoJ) contract for interpreting services with Applied Language Solutions (ALS) through the Framework Agreement (FWA) has been in operation since 1st February 2012. In some areas, the FWA contradicts the National Agreement (NA) set up in 1999. The NA provides guidance on arranging suitably qualified interpreters and Language Service Professionals; as per the requirements of Articles 5 - the right to be informed in a language one understands of the reasons for the arrest and 6 - the right to a fair trial, including right to have the free assistance of an interpreter; of the European Convention on Human Rights (ECHR). NA requires spoken language interpreters to be registered on the National Register of Public Service Interpreters (NRPSI).

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You will be aware that the new system of FWA is patently unsuccessful in its delivery. (Some relevant weblinks are given below.) In addition to the many concerns being raised from the Courts and other users, our own registrants inform us of the very real problems interpreters are facing and the difficulties being encountered by their clients in the justice sector.

Although we understand and support the two fundamental objectives of the FWA as applied to the contract with ALS – those of increasing efficiency and reducing costs, we have a direct interest in what should surely be the underlying principle – that of maintaining the quality and fitness for purpose of public service interpreting provision.

Quality Service

NRPSI has been observing the operation of the ALS contract since its inception and has major concerns as quality requirements are not being met resulting in the justice system failing to deliver what is expected of it. We therefore have serious concerns about your Police Authority adopting this demonstrably failing system without significant changes to ensure quality is maintained.

Our concern is based on our understanding of ALS's failure to meet many of its contracted performance KPIs and the numerous complaints from judges and other judicial staff about ALS's failure to provide interpreters or supplying unqualified, inexperienced and incompetent interpreters resulting in disruptions and delays to criminal trials. Here we also emphasise that serious inaccuracies in court interpreting can lead to wrongful conviction, which is detrimental to public protection.

You will of course be aware that the majority of NRPSI registrants and a large proportion of qualified professional interpreters have refused to register with ALS due to the lack of quality assurance and very low rates of remuneration. Hence you entering into a contract based on the current Framework Agreement with ALS may result in limited access to qualified professional interpreters for the Police Services you represent.

Cost Saving

Currently, many interpreters contracted by ALS do not have recognised qualifications. As the FWA fails to provide clear quality control mechanisms and is solely cost driven, ALS is forced to compromise on the quality of service being provided.

The unsatisfactory and unreliable services being delivered by ALS have resulted in extensive disruption, delay and inaccuracies to judicial proceedings, incurring considerable costs.

The FWA's arrangement also adds an additional tier in the courts sourcing system by requiring ALS to set up a supplementary list of interpreters. The National Register readily exists, is publicly available and provides a list of qualified accountable professional interpreters who have met its stringent quality criteria. The FWA's tiered system has extended the sourcing process adding complexity and cost.

NRPSI understands the need for public bodies to make savings. However, cost savings should not be made at the expense of quality and public safety. We are concerned that by adopting the FWA in its current state your Police Authority will be obtaining a false economy.

Code of Conduct

NRPSI is the UK's only independent voluntary regulator for the interpreting profession. Our register is recognised as being independent, transparent and credible. Our registrants are vetted thoroughly against stringent quality criteria. All interpreters on our register are subject to a Code of Professional Conduct. We are the only body that operates an open and transparent complaints procedure where our registrants are accountable to disciplinary actions in occurrence of any breaches of the Code. Details are available through the links provided below.

To date we have yet to observe any other Code in the interpreting field that is equivalent to or professionally recognised like the NRPSI's Code of Professional Conduct.

Conclusion

NRPSI is gravely concerned at the evidenced deterioration in quality of public service interpretation since the application of the ALS Framework Agreement.

If West Mercia and Warwickshire Police Alliance enters a contract with ALS or any other supplier, they should be required to demonstrate and provide concrete assurances that your services will not be affected in the same way as the MoJ's have been.

You will need to ensure that the new arrangements will be robust, efficient and effective to prevent ongoing poor service and public abuse. The key criteria given below will need to be included in the contract agreement to ensure competent interpreting service and public protection:

- To ensure high quality standards and qualification based selection, only qualified professional interpreters who are on the NRPSI's Register are used in providing services
- To ensure professional suitability and technical ability clear recognition of appropriate qualification are set

- To ensure creditability and accountability, robust compliant resolution and redress procedure is established
- To ensure real cost effectiveness, secure assurance measures for costs control and monitoring procedures are set
- To ensure efficiency of the process and arrangements, KPIs along with independent verification or audit are incorporated

NRPSI would be more than happy to meet with you and your colleagues to assist in the review We believe that, if required we can provide you with some valuable support in maintaining the appropriate level of quality police service and public protection.

Related information and links

The National Register of Public Service Interpreters (NRPSI)
([NRPSI](#))

Professional Interpreters for Justice Campaign
([Professional Interpreters for Justice campaign](#))

Related press articles
([Linguist Lounge](#))

Yours sincerely,



Ted Sangster

Chairman