



Efficiency and Effectiveness Review Programme
Tranche 1: Interpreters & Translators

Summary Report

April 2002

The logo for the Metropolitan Police Authority (MPA), consisting of the letters "MPA" in a large, bold, green serif font.

Metropolitan Police Authority

Summary Report

Interpreters and translators play a vital role in allowing the MPS to comply with legislation governing the treatment of detainees, to secure satisfactory outcomes in the criminal justice system and facilitate effective communication with London's diverse population. As at December 2001, the MPS was forecast to spend just under £8.1m in 01\02 on interpreters and translators, of which over 95% goes on interpreting – overwhelmingly, in and around the custody environment. The outturn was reduced to £7 million in January 2002, but it is not yet clear whether any increase in demand post September 11th has been factored into this forecast.

Background

The MPS currently has 305 Interpreters and 158 Translators on the 'Official List'. These interpreters provide cover for 84 languages (source: DPCS Figures). There are also 19 British Sign Language Interpreters on the Official List. This service is managed centrally for MPS by DPCS (which also holds the budget, none of which is devolved to Boroughs or OCUs).

'Official List' interpreters are not guaranteed any specific amount of work, are not organised into a rota system and can be called by any station at any time, 24 hours a day, 7 days a week, 365 days a year. From our sample, 59% of interpreter attendance was during the daytime (i.e. 8am to 8pm). Interpreters working for the MPS are from a variety of backgrounds. Some are in full time employment with other organisations, others are self-employed or retired.

Interpreters can be used at most stages of the custody process, from the reading of rights through to solicitor interviews and release. Interpreters can be called for in any type of case: the criterion is the needs of the detainee - a judgement that is made by the custody sergeant, driven by legislation such as the Police and Criminal Evidence Act 1984 (PACE). The Race Relations Amendment Act 2000, Disability Discrimination Act 1995 and Human Rights Act 1998 are also relevant to this area.

The MPS also has written translated material for communicating the rights and entitlements to detainees. These have recently been made available to custody sergeants via the Intranet.

Key Problems

These services face three principal problems, primarily around:

- Cost
- Quality
- Sustainability

Rising costs. The 00\01 budget for interpreters and translators was £4.6 million, with a reported overspend of £2.7m (nearly £1 million was subsequently accounted for by accruals). The budget for 01\02 was set at £6.27m, and subsequently increased to £7.8 million in December 2001. Currently, the forecast outturn is £7m million (source: MetFIN).

The expenditure varies according to Borough, although some caution should be applied to this given the problems accurately allocating spend to Boroughs. 12% of expenditure between March to September 2001 was unallocated at the time of this review. This reflects problems with both data collected by the current interpreter claim form.

Variability of quality. Interpreters have a key role in the delivery of the MPS service, and many are much valued by the Officers who use their services. But more custody suites report problems finding interpreters who can attend quickly. There is also anecdotal evidence of problems with the services delivered by some interpreters.

A number of custody officers interviewed said that getting hold of an interpreter in the first place was the major problem they faced. This not only created work for Officers (usually the arresting Officer) having to ring round searching for an interpreter but was felt to delay effective reading of rights (where English was very limited), the completion of the medical risk assessment form (57M) and sometimes hampered the early identification of the detainees request for a solicitor.

Interviewees felt that once an interpreter had agreed to attend, their actual response time was generally good but could be improved. This is backed up by Accenture's sampling findings, which showed an average response time of an hour and forty minutes (this may be affected by some being scheduled to attend interviews or solicitor consultations which may not require an immediate response).

There are also no fully functioning mechanisms for getting feedback from officers using interpreters. DPCS have called upon officers for feedback on interpreters they have, but this has not happened recently due to pressure on resources. However there are plans to use the intranet to develop this further.

Sustainability. The MPS may face demand for a significant increase in the extent of its interpreting services following the Amended Race Relations Act 2001. The impact of this has not yet been assessed, either in terms of required policy decisions or potential budgetary pressures. Simultaneous to this development the MPS is requiring all suppliers to become members of the National Register of Public Service Interpreters – a qualification that two-thirds of MPS suppliers had not obtained at the time of this review.

Causes

Some of these difficulties arise from a growth in *demand* for interpreting services, which in turn result from the increased diversity of London's population as well as a rise in the overall number in arrests – both factors being ones over which the MPS has little control. But this overall growth includes a sharp rise in the number of immigration cases (illegal entry or overstaying) – and not all of these costs are currently being recovered from the Immigration and Nationality Directorate (IND) of the Home Office. The costs which are recovered are not currently offset against the spend as Boroughs locally reclaim these costs on advice from DPCS as to the charges incurred.

But many of the difficulties are caused less by issues of demand than of *supply* – specifically, the way in which the MPS commissions, organises, delivers and pays for its interpreting services. The MPS:

- **does not organise interpreters into rotas** (even for the languages in greatest demand), meaning that rapid response cannot be guaranteed and is often forthcoming only after extensive efforts by custody sergeants;
- **organises interpreters on a purely London-wide basis**, thereby potentially missing opportunities for a cheaper and quicker service arising from Borough based provision. Nor does MPS use data to respond to pinch-points of acute demand for particular languages and skills (an activity hampered by current resource constraints);
- **pays its interpreters on a par with other criminal justice agencies but more generously than most other London public sector organisations**, particularly with payment arrangements for travel time and minimum periods;
- **makes little use of telephone interpreting through existing interpreters**, even though such an approach is cheaper, quicker and therefore potentially more effective in selected circumstances (such as reading of rights).

The problems facing interpreting provision as a whole are underpinned by a lack of formal quality standards, unclear ownership of the service by senior police management and the absence of a long-term strategy for the service's future development and supply.

Recommendations for Action

The main report makes recommendations in the following areas:

- **Improve the financial position of the service** in the short-term by looking to maximise (as part of current negotiations) recovery of IND-related costs and making increased use of telephone interpreting (recommendations 1 & 5)
- **Identify key languages and ‘pinch points’** where the MPS needs to tackle its limited ability to meet demand and consider Borough-based provision, and a model that targets the high demand languages for a pan-London rota (recommendations 2 & 4)
- **Collect and assess data on how the service is being used** and address the problems with current data recording to ensure an accurate reflection of Borough spend (recommendations 3)
- **Produce policy statement and reorganise management responsibilities** to ensure more effective and efficient ownership and delivery of the service. The policy statement will set out the overall role of the service, its objectives, scope for local provision, and resolve conflicting advice of different ACPO polices in this area (recommendation 7; 8 & 9)
- **Develop quality standards** for agreement with main users covering:
 - Inputs – the skills and qualifications required of interpreters and translators, as well as targeted training requirements
 - Outputs – timeliness of response, satisfaction of officers and solicitors, accuracy of translated material
 - Outcomes - contribution to effective running of criminal justice, for example reporting and successful prosecutions (recommendation 6)
- **Take some fundamental decisions about the way in which the service is supplied and organised.** These decisions should be taken by senior police management across PRS, TP, SO and DCC (with PRS having the overall lead), who should be given responsibility for determining the future strategy for the service and associated questions of quality standards, service organisation, investment in new technology and facilities, and financial devolution (recommendations 7 & 10)

The recommendations are attached in full below.

Recommendations and Actions

The following section outlines the recommendations made in the report. The recommendation number indicates the order in which they appear in the report, and they are presented here in terms of short-term, medium term and strategic.

No.	Short-term Recommendations	Priority H\M\ L	Suggested MPS lead	Indicative Savings	Potential costs (Staff days)	MPS Response
1	<i>Ensure that the full costs of interpreting services for immigration cases are included within negotiations with IND, with a view to maximizing the percentage of costs recovered as income from IND.</i>	H	AC PRS	£1.42m	15 Central	Accepted – action has started. Income must be credited against the Interpreters' budget (GL5757) to offset against expenditure.
3	<i>Prior to evaluation of alternative supply models address the problems with current data recording to ensure an accurate reflection of Borough spend.</i>	M	AC PRS	N/A	15 Central 10 Local	Accepted. LFMS would take the lead (assuming change of strategic management to AC PRS). The resources required may need to be prioritised against other recommendations.
4	<i>Tackle priority pinch points where evidence suggests existing MPS list is not effective in order to improve running of the existing service by re-organising (or increasing current supply through recruitment) of provision for languages, such as Albanian, Twi, Bengali, Turkish and Arabic.</i>	M	AC PRS	N/A		Accepted. This forms an integral part of the current LFMSB policy move towards registration of interpreters via the National Register.
5	<i>MPS should maximise the use MPS interpreters for telephone interpreting, in particular for the</i>	H	AC PRS	£360K	15 Central 15 Local	Accepted. A policy shift will be pursued.

	<i>reading of rights and completion of the 57M risk assessment form.</i>					
8	<p><i>Reorganise management responsibilities to ensure more effective and efficient ownership and delivery of these objectives by:</i></p> <ul style="list-style-type: none"> <i>• allocating responsibility for policy, service specification and commissioning to PRS</i> <i>• transferring ownership of budgets to TP (ensuring effective links with SO to ensure their requirements are met)</i> <i>• allocating oversight of day-to-day local operations in each BOCU\OCU to a lead officer (to be member of that unit's management team)</i> <i>• supporting this process with monthly management information (having first addressed existing problems with accuracy of financial information)</i> 	H	AC PRS	N/A	N/A	<p>Partly accepted. Caveats about the efficiency and effectiveness of a devolved service have been presented to Accenture.</p> <p>Management and financial information will require some IT expenditure and resourcing (which has not been identified) and monthly reporting is accepted subject to this qualification.</p> <p>Identification of a BOCU liaison lead is fully supported, but there may be resource implications for BOCUs which are not identified.</p>

No.	Medium-term Recommendations	Priority H\M\L	Suggested MPS lead	Indicative Savings	Potential Costs (Staff days)	MPS Response
6	<p><i>PRS should develop quality standards for agreement with main users (TP, SO, Diversity Directorate). These standards should cover:</i></p> <ul style="list-style-type: none"> • <i>Inputs – the skills and qualifications required of interpreters and translators, as well as targeted training requirements</i> • <i>Outputs – timeliness of response, satisfaction of officers and solicitors, accuracy of translated material</i> • <i>Outcomes - contribution to effective running of criminal justice, for example reporting and successful prosecutions.</i> 	H	AC PRS	N/A	40 Central 60 Local	Accepted. The staff days could not easily be absorbed within existing LFMSB workforce levels. There may be a function for a 'principal interpreter' role which was explored during the 2001-02 fee negotiations.
7	<p><i>Ensure TP and lead officers are provided with quarterly information on performance against agreed policy standards.</i></p>	M	AC PRS	N/A		Accepted. See comment against recommendation 8 in relation to IT development for measuring key performance indicators.

<p>2</p>	<p><i>Examine more effective ways of organising existing supply by:</i></p> <ul style="list-style-type: none"> • <i>examining workloads to identify scope for contracts and rota with a cadre of interpreters for high demand languages in order to improve quality and availability</i> • <i>examining workloads to identify feasibility of Borough based provision</i> 	<p>M</p>	<p>AC PRS</p>	<p>N/A</p>	<p>40 Central 15 Local</p>	<p>Accepted in principle. LFMSB support the introduction of contracts subject to constraints of employment legislation affecting overall service levels.</p> <p>LFMSB has established a framework for a rota of sign language interpreters which may be an effective model for some spoken languages.</p>
<p>9</p>	<p><i>PRS to produce a policy statement for interpreting and translator services setting out its overall role and objectives in supporting MPS, by:</i></p> <ul style="list-style-type: none"> • <i>agreeing policy with main users of the service, TP and SO, as well as Diversity Directorate</i> • <i>assessing implications of Amended Race Relations Act as well as PACE compliance.</i> 	<p>M</p>	<p>AC PRS</p>	<p>N/A</p>	<p>15 Central</p>	<p>Accepted</p>

No.	Long Term Recommendations	Priority H\M\L	Suggested MPS lead	Indicative Savings	Potential Costs (Staff days)	MPS Response
10	<p><i>Ensure the current Best Value review of custody considers options for modernising provision of interpreting and translating services by:</i></p> <ul style="list-style-type: none"> • <i>identifying the potential implications and opportunities that a move to fewer, larger custody suites may provide</i> • <i>assessing the improvement opportunities provided by the adoption of new tools and technology (such as intranet, video links) in the wider context of custody requirements and other 3rd party services used, such as FMEs</i> • <i>considering options for new outsourced model (for example independent Charitable Trusts funded by MPA) for overall delivery of all 3rd party</i> 	M	AC PRS	N/A	N/A	Accepted. The recommendations effectively set out the MPS long-term strategy for developing the custody officer-witness/victim/detainee interface. This will be a major project, which will impact on existing service systems, and, although costs will be significant, there will be justifiable benefits.

	<i>services, such as interpreters, appropriate adults and FMEs.</i>					
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