



Emergency Video Relay Delivered by Sign Language Interactions (SLI)

Formal Application



Sign Language Interactions (SLI): Emergency Video Relay Formal Application

Introducing the SLI Group

The SLI Group, comprising Sign Language Interactions, InterpreterNow and SignVideo, is a market leader of language communication services for Deaf, deafened, and deafblind people across the UK. Established in 2003, we have 18 years' experience of delivering British Sign Language (BSL) interpreting on a 24/7/365 basis, supporting [⌘] Deaf and Deafblind BSL users each year UK-wide through high profile, face to face and video relay interpreting services commissioned by the public and private sectors. We have built a reputation for high quality, customer-focussed services and standards. In recognition, we have achieved the ISO9001 Quality Management standard and a range of awards, for example the Scottish Sensory and Equality Award for outstanding practice, innovation and dedication to sensory loss and inclusion in Scotland (2019)

We are also the leading BSL video interpreting supplier nationally, with unparalleled experience, capability, and resources, delivering video relay services for contactSCOTLAND-BSL, central Government (DWP), NHS 111, the National Pandemic Service (119), Northern Ireland Health and Social Care and Social Security Scotland. We currently handle on a voluntary basis [⌘] emergency calls per month across our services, and have established systems which ensure that they are answered quickly and handled appropriately. Ofcom's proposed service fits squarely into our core business portfolio and is what we are passionate about delivering.

SLI's organisational mission is *'to facilitate communication between Deaf and hearing people, so that language is no longer a barrier to access, understanding, and opportunities.'* This service aligns with our mission and our values, and we view its delivery as integral in our drive to maximise inclusion for the Deaf community, enabling all end users to access emergency communications.

SLI's Offer

In the sections below, we have aligned our proposal to your seven Approval Criteria, detailing and evidencing how we will meet your requirements in full and on an ongoing basis.

The communication providers and appointed emergency service supplier will need to work together to ensure the service design and features are developed fully and aligned to the General Conditions.

Working with our in-house creative marketing design manager, we have created a high level concept design to show how the brand, dedicated app and website could look - see appendices 1.

1. General Compliance

We have the capacity and capability to satisfy all requirements set out in the Emergency Video Relay General Conditions at C5, working closely with Ofcom and regulated providers (and the wholesaler, should one be appointed) to develop and deliver a confidential, accessible and resilient emergency video relay service which will be free of charge to end users.

We will ensure that the service complies with the Communications Act 2003 and Ofcom's regulatory requirements, including the Schedule of new General Conditions and the new defined term. Our service will:

- Be accessible to end users via readily available compatible terminal equipment with video capabilities, including smartphones, computers and tablets.
- Provide facilities for access to Emergency Organisations.
- Be fully resilient, and available 24/7/365.
- (Insofar as is reasonably practicable) allow for communication between end users of the service at speeds equivalent to voice communications, with a call answer time of within 5 seconds for at least 95% of calls.
- Provides a means of communicating by text in conjunction with video relay through our MMX total communication platform.
- Ultimately, prevent fatalities, promote quicker emergency responses, benefit the emergency services through faster and more accurate calls, and increase the dignity and peace of mind of Deaf BSL users simply by knowing the service is there for them should they need it.

Having participated actively in the consultation process and having engaged with key stakeholders over the last 18 months, SLI is confident that we can develop and implement the service by 17th June 2022. The design, development and implementation phases will be led by our CEO, Andrew Dewey, who has over 22 years' experience of developing pioneering, inclusive services for the Deaf community in the UK. For example, in 2020, in response to the global pandemic, working in partnership with James Watson-O'Neil, CEO of SignHealth, Andrew led the implementation of SLI's 24/7 BSL Health Access Service from a standing start to servicing 35,000 video relay calls across England, Wales and Scotland in its first 12 months.

Andrew will act as the lead point of contact for Ofcom, the wholesaler and regulated providers, leading service development and implementation. He will be supported by a dedicated Project Team comprising of:

- [X], Director of Interpreting. [X] will oversee selection, training and ongoing resource planning for our interpreter team.
- Technical and Engineering Team, led by [X], Head of IT. This team will lead on app and website development and testing, and will be further supported by our parent company Sorenson's [X] team of engineers and software developers.
- Established PMO team, with experience of managing end to end delivery of projects and services
- Creative Design and Marketing Team. This team will lead on app and website branding and contents, including user guides, as well as working with Ofcom, regulated providers and the wider voluntary sector to promote and market the service. The team is led by our Director of Marketing and Design, and our Creative Marketing Manager. Both of these individuals are native BSL users, and will bring both their professional and lived experience to this project to maximise accessibility of the service.
- Customer service and community engagement team. This team includes native BSL and ISL users, they will provide on demand customer support and community outreach activity.

2. Accountability and Reporting

Our CEO will maintain top level oversight of all contractual matters throughout the agreed contract term, acting as the senior point of contact for Ofcom, the wholesaler and regulated providers, and ensuring compliance with any directions that Ofcom may make from time to time. We will also assign a dedicated project manager lead to manage the day-to-day running of the service. This will be [X], SLI Operations Manager. [X] has been with the Group for over [X] years and has overseen the successful delivery of our NHS 111 video relay service,

which handles over [X] calls per month, and has had [X] complaints per annum (during the last 6 years) and 0% downtime. [X] reports into our Director of Operations, [X].

Quarterly Management Information (MI) reports in the format specified by Ofcom will be collated by the Operations Manager before being submitted to [X], our Directors of Operations, for verification checks to ensure 100% accuracy before electronic (password protected) submission to Ofcom (and the wholesaler, if one is selected). This will include, as a minimum: number of app downloads; number of emergency communications; average speed of answering; and number and summary of any complaints.

We are able to easily provide a range of other performance and quality metrics which are recorded in real-time by our MMX video interpreting platform, should you wish. MMX generates a call data record for each call made through the service including: [X]. This includes:

- Real-time statistics: [X].
- Web-based statistic reports: [X], number of calls answered per-hour, answer time in seconds.
- [X] ensuring appropriate staffing levels are maintained which offer excellent service capacity and value for money for regulated providers.

Our Operations Manager will work with all key parties during the contract implementation period to agree and refine data collection and reporting mechanisms. We will also publish an annual report detailing compliance with the Approval Criteria and any related issues as directed by Ofcom.

3. Access

SLI will ensure end users can access the emergency video relay service via a dedicated app, and a dedicated website, free of charge (including the app itself being downloadable free of charge). Comprehensive, clear and user-friendly instructions on how to use the service will be available in both BSL and English on the app and the website. Users have a choice to register or not. Nothing will obstruct them from making an emergency call. In Northern Ireland, part of the Deaf community uses Irish Sign Language. SLI provide ISL video interpreters and translations and can make these services available, should Ofcom or CP's add this requirement. There is also the option to add the emergency 999 button for free on the UK's largest and most used SignVideo directory and contactSCOTLAND-BSL app.

The app and website will connect end users to our existing MMX interpreting platform, which SLI has used for the last nine years. MMX is already used to successfully deliver our video relay services including contactSCOTLAND-BSL (which also has its own dedicated app), NHS 111, Police 101, and the National Pandemic Service 119. The platform is highly secure, with accreditation to ISO9001, ISO27001 and Cyber Essentials, and is highly reliable and robust. It has been designed with the in-built functionality to handle emergency calls and is already used to deliver emergency video relay services in countries including Sweden, Netherlands, and America. SLI has extensive experience of configuring MMX to deliver aligned services, and of working with commissioners and public authorities to develop new video relay services with bespoke, highly specialised requirements. [X].

MMX is fully accessible via a range of current (and emerging) devices across multiple options such as videophone, website, standalone app, smartphone or tablet, and is compatible with mainstream technology platforms (currently iOS, Android and Windows) operating systems/versions, and with most mainstream web browser types and versions. The platform is future-proofed, backwards-compatible, and will be continuously updated during the contract term to ensure compatibility with current and future versions of operating system available in end user devices. The MMX platform also offers accessibility features for Deafblind people, for example a BSL user who has lost their sight and uses a braille display can connect to an interpreter, sign and receive a message back in braille.

MMX intelligently delivers all calls on a first-received basis, and will automatically route calls to our designated interpreters for this service using a pre-defined set of rules. It features in-built geolocation, whereby the location of the end user is displayed on the interpreter workstation in Google Maps – this will enable us to automatically record incident location (which will be validated during the call by the interpreter). It also enables end users to communicate with our interpreters using text relay, ensuring we meet all specified requirements.

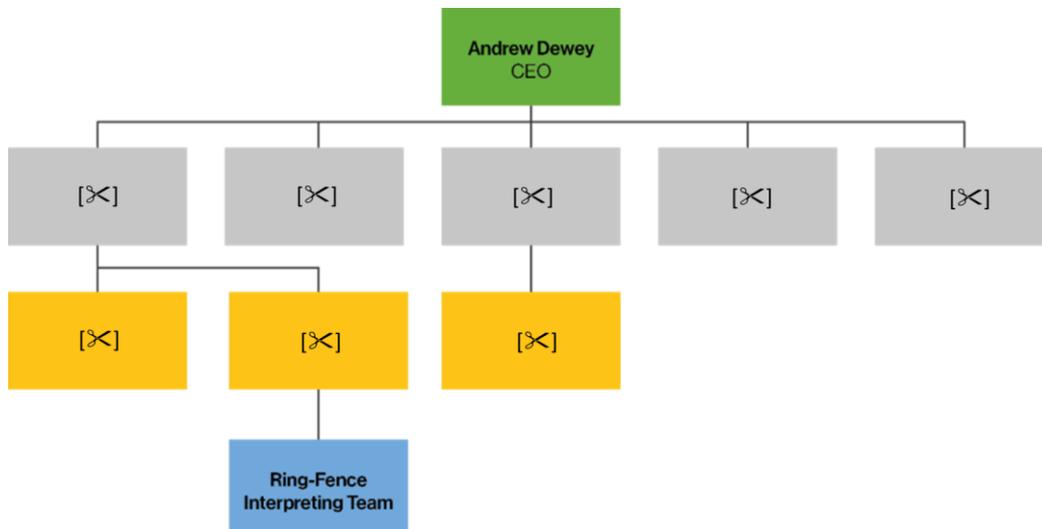
All end users will be given the option to register on the app and website – this will be voluntary only and not required in order to use or access the service. They will be asked if they would like to voluntarily provide their information in order to allow call backs from our interpreters (in video relay format) should the emergency services need to call back. End user data will be held within the agreed retention period and in compliance with data protection and privacy laws.

We confirm that we will liaise with regulated providers, including during the design and development phase, with a view to facilitating zero-rating of data used in connection with the service and/or app. Many of the larger in-scope regulated providers [redacted] are already clients of the SLI Group and therefore we have existing relationships which will facilitate collaborative working.

4. Operational Matters

SLI’s existing in-house interpreting capacity ensures we will implement this service using hand-picked, experienced and trusted interpreters. This includes currently [redacted] interpreters working at any one time during the day, and [redacted] the night. We have a robust staffing structure in place, ready to develop and deliver a UK video emergency service as follows:

Chart 1: Emergency service organisational structure



All interpreters working on this service will:

- Be registered Sign Language Interpreters with NRCPD (SLI fully funds full-time employees annual interpreting registration).
- Be DBS checked within the last two years.
- Have minimum three years' post-qualifying experience acting as a BSL interpreter in a range of settings.
- Follow industry Codes of Conduct plus additional guidelines e.g. adherence to Association of Sign Language Interpreters' Video Interpreting Best Practice Guidelines.
- Successfully completed tailored emergency call handling training.

As part of our recruitment process, each interpreter undergoes robust vetting, and must provide evidence of valid, up-to-date registration, which we cross-reference against NRCPD's online register annually. This means that they meet national standards and have completed a recognised interpreter training programme. We track registration expiry dates and send automated reminders to renew. If an interpreter does not renew/evidence their professional membership, they are suspended from assignments, ensuring we only ever use registered professionals.

They will also have extensive experience of highly technical BSL interpreting and will be confirmed as competent to interpret highly sensitive and potentially pressured assignments. Our interpreters further bring an in-depth understanding of likely ethical issues to arise on this service, including respecting confidentiality and impartiality, responsibilities relating to disclosing information to relevant Authorities (e.g. safeguarding concerns), and recognising/responding to unacceptable behaviour by ends users.

For the emergency video relay service, we recommend a ring-fenced team of interpreters who will deliver this service, as well as pre-selecting a trained pool of experienced in-house interpreters who will provide additional overflow capacity as needed. All interpreters will be required to complete a comprehensive, service-specific training package as part of their induction before being authorised to commence delivery of the emergency service, including GDPR/data protection, confidentiality, Equality & Diversity, and safeguarding. We provide a range of CPD (minimum 30 hours per interpreter each year), which keeps their skills and knowledge up to date. This includes language skills, dealing with conflict, trauma-informed approaches to interpreting, and call handling best practice from our NHS24 call handlers.

In addition to our comprehensive CPD offer, our retention strategy aims to motivate and support our staff, and promote wellbeing, including:

- Competitive pay and reward: we are an accredited Living Wage Employer.
- Generous employee benefits e.g. private pension and sick pay, funding for each interpreter's annual registration.
- On-hand support throughout every shift from dedicated Interpreting shift Supervisors.
- Immediate de-brief with a peer or Interpreting Supervisor should an interpreter experience a challenging or traumatic situation arise.
- Regular team meetings facilitate peer-led discussions on issues relating to interpreting in a safe, open and supportive environment.
- In-house team of mental health first aiders
- Free professional counselling and distress management, CPD on health and wellbeing topics.

Procedures for avoiding harm/distress as a result of calls are detailed within our interpreting guidelines and include dealing with: nuisance, irrelevant or repeat calls; abusive and/or inappropriate calls; calls where the caller appears to be in distress/pain or incapacitated; and calls where the subject matter demands sensitivity and/or may require third party disclosure (safeguarding/welfare). All interpreters undertake induction training on dealing with challenging cases such as these, including role-playing challenging situations. SLI has established working partnerships with NHS 111, NHS24, HSCNI and Police Scotland through which call handling process are reviewed and interpreters shadow their call handlers to learn best practice in dealing with challenging callers. If an interpreter is distressed as a result of an assignment, immediate and confidential support is available, detailed above.

These provisions have enabled us to maintain a staff retention rate of 97% since 2016. We also provide guidance to interpreters on appropriate interpreting duration and call complexity, enabling them to use their professional judgement on when and how to bring in a second interpreter where needed.

Interpreters will deliver the service from a dedicated, well-lit and soundproofed video interpreting room. Interpreters work from a hybrid of SLI's offices across the UK and remote locations. There should be restricted access to the room, regardless of location all interpreters will be required to meet the same set-up standards including:

- Must wear professional attire, and ensure that torso, arms and face are clearly visible.
- Standard Door, no pocket, sliding, or accordion, so that no one can gain access while the interpreter is working
- Ergonomically adequate room size, desk and chair
- Safe Electricals/Extensions - i.e max of one extension cable, no cables chained one to one.
- Adequate Window Coverings
- Adequate Room Lighting
- Meets Minimum Internet Thresholds – 5 MBPS upload and download
- Use of company provided backdrop.
- Use of company provided technical equipment.
- No other devices i.e. phone, paper or pen on the desk.

All interpreters will be given a pre-configured Dell workstation (only facilitating access to VRS software), including webcam, headset and microphone. Our MMX platform will be programmed to route emergency calls to our dedicated interpreters delivering this service. [3<]. [3<]. This will ensure that we always have sufficient capacity, including during potential peaks. Our Head of Operations will carefully monitor service usage and capacity, and review resource levels on a monthly basis initially, scaling up or down as appropriate.

5. Quality of Service

SLI confirms our ability to answer calls within 5 seconds, 95% of the time as a minimum. We will achieve this response time by having a ring-fenced on-demand team of interpreters.

Where possible, an interpreter will complete a call even if it lasts longer than 30 minutes. As detailed above, they will be trained in using their professional judgement on when/how to bring a second interpreter onto a call, undertaking team interpreting to make sure they capture all linguistic and visual information in highly charged situations. We know from experience that this will particularly be relevant with highly vulnerable callers, when multiple parties are signing, where there are multiple visual communications occurring (e.g. demonstrating CPR and signing), or in emergency and/or suicidal situations. This ensures our interpreters have appropriate emotional and practical support during the call, and that nothing is misunderstood or misinterpreted. They will also undergo training on determining the most appropriate point at which to exit an emergency communication once the emergency services have arrived.

The service will be underpinned by SLI's proven performance management processes and ISO9001-accredited Quality Management System, which will be overseen by the service lead, our Head of Operations. This will include:

- Management procedures giving clear instructions and guidance supporting effective delivery, management and quality enhancement e.g. SLI User Manual for video interpreting.
- Systematic quality assurance of interpreting delivery following a risk-based audit schedule, ensuring consistent standards across all provision e.g. live call monitoring by Interpreting Supervisors; [redacted]; audit of recorded calls; and collation and analysis of stakeholder and end user feedback. We confirm this will include bi-monthly quality of service checks of emergency communications that will be carried out by senior interpreters retained by the emergency video relay service. We would suggest that these occur more frequently during the initial period following Go Live (e.g. weekly).
- Detailed performance reports and data monitoring and analysis for each service which informs management meetings, staff performance reviews, standardisation, and strategic decision-making.
- Internally-generated continuous improvement plans issued to support quality improvement activities, reviewed and updated quarterly.

Uniquely, our MMX platform has the in-built capability to record all video conversations as required. Retention of any recording will be in line with the retention periods for emergency voice calls and recordings must be stored safely, securely and accurately, in line with standards for voice calls. We will comply with all applicable data protection and privacy laws.

6. Adequate Resources

SLI confirms that we have sufficient funds, facilities and staff to provide the emergency video relay service and to enable us to perform properly the administrative, technical and professional work in scope. We are in a stable financial position, [redacted].

From a facilities and staffing perspective, we bring an experienced, long-standing senior management team which has experience of successfully overseeing the implementation and delivery of 24/7/365 video relay services including NHS111, the National Pandemic Video Relay Service, contactSCOTLAND-BSL and the 24/7 BSL Health and Social Care Remote Sign Language Interpreting Service. These are underpinned by the same tried-and-tested systems and facilities that we will deploy for this service, including our ISO9001 Quality Management System and performance management framework, our MMX platform, and investment in high quality Dell workstations and associated technical and telecommunications infrastructure.

Our interpreting team use fully secure PCs [redacted]. Each workstation is fully secure and only accessible through encrypted login. These are Dell All-In-One machines running Windows 10 Professional. Each workstation has two cameras, two headphones, and superfast fibre broadband connection; all administered and supported by SLI's Operations and Technical & Engineering Support teams. Interpreters also use high-quality Plantronics headsets and lighting kits to optimise workstation lighting. There are no single points of failure in our service setup.

Our systems have sufficient technical resilience and resources to provide an uninterrupted service (so far as is technically feasible). Our MMX platform offers a range of features, including:

- Enhanced videophone streaming, including bi-directional symmetric real-time transfer of voice and motion video between two locations.
- Video requirements of 25-30 frames per second at CIF resolution and with overall delay not exceeding 400 ms, and video inhibition option.
- Sound synchronization better than 100 ms, and ability to mute calls.
- [redacted].
- [redacted].
- Voice carry-over: The system includes the ability for a BSL user who prefers to use their voice to be able to speak to the recipient (voice-carry-over) and receive any reply in BSL via the SLI interpreter.
- Geolocation: the location of the user is displayed on the interpreter workstation in Google Maps.
- High levels of information security: The servers and database are hosted by Pulsant in a secure, access-controlled Tier 4 Location in Milton Keynes. Pulsant provides a fully managed, 24-hour service, with independent and fully redundant power and lighting, multiple layers of physical security, and a service availability of 100% uptime for power and transit. Pulsant is accredited to ISO27001, ISO9001 and ISO14001.

The MMX platform is purpose built for handling emergency services and used by other governments around the world to provide video access for public services, health care and emergency, such as Bildtelefoni in Sweden, CAB Flanders in Belgium, CDA Sanad Relay in Dubai and Thai Telecommunications Relay Services. It is also used as the technical platform for national VRS providers including Tess Germany, Global VRS USA, PROCOM Switzerland, Småtegn Denmark. It is currently operational in 13 countries around the globe. It has also been successfully used to underpin SLI's contactSCOTLAND-BSL service since 2012 and is also used on our other services, including NHS 111, Pandemic Flu service, HSC Northern Ireland, and Police 101. [redacted], we receive; second and third line technical support on a 24/7/365 basis; full platform performance monitoring, service escalation and reporting; technical development/upgrades; and app support. We also have dedicated in-house systems support through our Engineering and Technical Team, and our parent company Sorenson's [redacted] team of engineers and software developers (24/7/365, as needed).

SLI deploys a core complaints process, which can be tailored for individual services to meet individual commissioner requirements. Our complaints policy is available in a range of formats including BSL and Easy Read. Details will be shared on the service's website and app, and should you wish, we can embed links within both the website and app enabling end users to submit a complaint. All management staff, supervisors and interpreters are trained in how to receive and record complaints. Our process comprises:

1. In first instance, complaints can be made to our dedicated Customer Care Service that is staffed by Deaf BSL users. Complaints will be logged and acknowledged within 24 hours either over email/phone, via the app, or as a BSL video recording via video-mail/online contact form.
2. Any complaints which cannot be immediately resolved are escalated to the relevant manager (Head of Operations) for further investigation. They will review the evidence and consult further as necessary to identify the most appropriate way to resolve the issue.
3. The relevant manager will communicate the outcome of the investigation and resolution offered to the complainant in writing within 5 working days.
4. If an appeal is made, it will be escalated to the CEO for review and final decision within 20 working days.
5. If the complaint remains unresolved and the complainant is not satisfied, we will then refer them to the Authority.

We will report on the number of complaints received, complaints resolved, and any trends or themes identified as part of our formal monthly reporting to the Authority. SLI provides full assurance of our ability to provide an excellent level of customer service, for example our 12-month complaint rate for all services sits at [X] complaints per annum.

7. Provision on Fair, Reasonable and Non-Discriminatory Terms

SLI would be happy to contract directly with providers of number-based ICS and IAS, or with a wholesaler. We will deploy ringfenced interpreters and leverage existing infrastructure and systems. These successfully underpin our other high profile video relay services, including contactSCOTLAND-BSL, HSCNI, NHS 111, and the National Pandemic Service 119. Service capacity will be reviewed monthly for the initial delivery period, with resources scaled up or down as appropriate and in consultation with Ofcom and the wholesaler. We are confident that SLI's proposal, built upon robust infrastructure and a responsive resourcing approach, will offer excellent service quality and value for money.

SLI undertakes to agree to contract in respect of the service on a fair, reasonable and non-discriminatory basis as part of any contract with any regulated provider, wholesaler, and/or another third party intermediary. We will ensure the inclusion of a clause in such contracts, documenting that the contract has been agreed on that basis. Further, if we enter into a contract with an intermediary in respect of this service, we will require as part of that contract, that the intermediary will contract with regulated providers on a fair, reasonable and non-discriminatory basis; and that the intermediary will ensure the inclusion of a clause in its contracts, documenting that the contract has been agreed on that basis.

Signed for and on behalf of Sign Language Interactions Ltd

Date: 11th August 2021

Signature: 

Full name: Andrew Dewey

Position: CEO

Appendices

1. Mock-ups of the service's app screen and website.

SERVICE DESIGN and CONCEPT REDACTED