

## DMPC Decision – PCD 1195

**Title: Technology to allow Language and Cultural Services to deliver 24/7 Language Support to all of the MPS as required by the Police and Criminal Evidence Act 1984**

### Executive Summary:

The Language and Cultural Services (LCS) team are facing increased demands for their services from officers on the frontline and this situation risks a degradation in service unless the existing CRM system is replaced. With an increase in officer numbers, this will also lead to greater demand.

The present CRM system used is no longer fit for operational purpose due to its unreliability and slow response times. It is no longer in support and over the last few years a team from Accenture have been required to keep it running. The code behind the existing system is unavailable so no new functionality can be added and a replacement system is urgently required.

Since 2013 and the introduction of their current system, LCS has seen an increase of 47% in assignments and 178% increase in translation support. The introduction of the new system directly supports the community in enabling direct access to the appropriate language service more quickly in an emergency or non-emergency situation.

### Recommendation:

The Deputy Mayor for Policing and Crime is recommended to:

1. Approve the purchase of a new Customer Relationship Management system (CRM) for the Language and Cultural Services (LCS) team with a Capital spend of £376,400 to be funded from the MO11 Reserve
2. Approve ongoing Revenue cost of £69,700 in 2022/23 and £142,200 per annum from 2023/24 which will be funded from the MO11 BAU revenue budget.
3. Approve Procurement Route and the Award to Workbooks (the procurement route has been completed by MPS Commercial Services).

### Deputy Mayor for Policing and Crime

I confirm I have considered whether or not I have any personal or prejudicial interest in this matter and take the proposed decision in compliance with the Code of Conduct. Any such interests are recorded below.

The above request has my approval.

**Signature**

*Hanahucherd.*

**Date**

**21/04/2022**

## **PART I - NON-CONFIDENTIAL FACTS AND ADVICE TO THE DMPC**

### **1. Introduction and background**

- 1.1. The Language and Cultural Services (LCS) team are responsible for delivering the growing demand for linguistic services across the Metropolitan Police Service (MPS). This work involves providing frontline officers with access to approved interpreters and translators.
- 1.2. At present LCS use a Microsoft Dynamics based CRM System built by Fujitsu that went live in 2013. This system manages the booking and deploying of interpreters and translators; retaining their qualifications, vetting records and feedback reports; making and recording payments to interpreters and translators for their service. But the system is no longer fit for operational purpose due to its unreliability and slow response times. Over the last few years a team from Accenture have been required to keep it running and so a replacement system is urgently required.
- 1.3. A fundamental problem with the existing Fujitsu system is that the underlying upgrade code is not available making it impossible to add new functionality. It is also incompatible with Windows 10 mobile devices and does not fully comply with the General Data Protection Regulation (GDPR) that came into force on 25th May 2018.
- 1.4. The present situation is no longer tenable for LCS as the increased demand for their services means they need to exploit new technology, increase capacity and make better use of existing staff rather than using time consuming work arounds when the system fails or hangs. The new system is required to meet the LCS customer expectations for a fast response and to enable efficiency and customer drives within the team.

### **2. Issues for consideration**

- 2.1. Ongoing Revenue cost of £69.7k in 2022/23 and £142.2k per annum from 2023/24 will be funded from the MO11 BAU revenue budget.
- 2.2. The present CRM platform is no longer in formal support from the original developers and support is provided on a 'best endeavours' basis. Reliability is an issue, which is causing disruption to the service provided to frontline officers and payment delays to interpreters and translators.
- 2.3. The absence of the original developer's code means that the present CRM cannot be developed and neither can it take advantage of new technology that would help LCS to become more efficient and improve their service.
- 2.4. The new system will enable the streamlining and automation of the LCS processes, will integrate with MS Office and eliminate the rekeying of information and manual effort.

- 2.5. The new system will ensure compliance with the General Data Protection Regulation (GDPR).
- 2.6. MO11 LCS have secured funding from their own budget for the new CRM System which includes formal support agreements.
- 2.7. The integration strategy between the new CRM and the MPS infrastructure has not been fully defined but this will not impact on the functionality of the new system.
- 2.8. Since 2013 and the introduction of their current system, LCS has seen an increase of 47% in assignments and 178% increase in translation support. The introduction of the new system directly supports the community in enabling direct access to the appropriate language service more quickly in an emergency or non-emergency situation.

### **3. Financial Comments**

- 3.1. This proposal will involve a capital spend of £376.4k and an ongoing revenue cost of £69.7k in 2022/23 and £142.2k per annum from 2023/24. These costs will be funded from within existing MPS resources.
- 3.2. These revenue costs are additional costs for licensing due to moving to Digital Policing's Cloud Strategy. The maintenance costs will continue to be covered by Digital Policing.

### **4. Legal Comments**

- 4.1. A Crown Commercial Services framework agreement is in place as the preferred route to market for the proposed contract award.
- 4.2. An award of this product will be procured in accordance with MOPAC's Regulations and the route to market is compliant with these Regulations. There are no personnel implications and TUPE will not apply to this procurement action.
- 4.3. This new system will efficiently allow LCS to continue to fulfil their legal PACE obligations by allocating and deploying language resources within the communities of London. Suspects, victims and witnesses have the right to be able to communicate effectively throughout criminal proceedings and to have language services supplied if needed.
- 4.4. Under the Ministry of Justice (2015) Code of Practice for Victims of Crime, a victim or witness is entitled to request interpretation and/or translation services in a language they understand – for example, when reporting a crime, being interviewed or giving evidence.

- 4.5. Suspects also have the right to have access to language services under the Police and Criminal Evidence Act 1984 (PACE) and PACE Code C, 13 and Code H for terrorism matters. See also the Directive 2010/64/EU of the European Parliament and of the Council of 20 October 2010.
- 4.6. The Human Rights Act 1998 and Article 6 (3) of the European Convention on Human Rights (ECHR) guarantees the right to have the free assistance of an interpreter if the accused cannot understand or speak the language used in court.
- 4.7. The Mayor's Office for Policing and Crime ("MOPAC") is a contracting authority as defined in the Public Contracts Regulations 2015 ("the Regulations"). All awards of public contracts for goods and/or services valued at £189,330 or above shall be procured in accordance with the Regulations. This report confirms the value of the proposed contract exceeds this threshold.
- 4.8. The report confirms the MOPAC's route to market is compliant with the Regulations.
- 4.9. The MOPAC Scheme of Delegation and Consent provides the Deputy Mayor for Policing and Crime ("DMPC") has delegated authority to approve:
- Business cases for revenue or capital expenditure of £500,000 and above (paragraph 4.8); and
  - All requests to go out to tender for contracts of £500,000 or above, or where there is a particular public interest (paragraph 4.13).
- 4.10. Paragraph 7.23 of the Scheme provides that the Director of Strategic Procurement has consent for the approval of the award of all contracts, with the exception of those called in through the agreed call in procedure. Paragraph 4.14 of the Scheme provides the DMPC reserves the right to call in any MPS proposal to award a contract for £500,000 or above.

## **5. Commercial Issues**

- 5.1. The paper is seeking the approval to procure and award the contract.
- 5.2. The strategic route to market is via G-Cloud 12 on the Digital Marketplace. MPS Commercial Services have conducted a search on the Digital Marketplace to return a shortlist of potential products. All search results were saved on the Digital Marketplace for audit purposes.
- 5.3. This framework allows UK public sector bodies to choose and purchase cloud computing services covering infrastructure, platform, software, and specialist cloud services. This is a quicker process, and the suppliers are already prequalified. This is a simple, low risk procurement route.
- 5.4. The Business reviewed shortlisted suppliers' documents (to include Supplier Service Offering, Supplier Terms and Conditions and Supplier Pricing Schedule) on the Digital

Marketplace to assess suitability against the requirement and determine the Service that best meets LCS' needs.

- 5.5. A down-selection and evaluation process has been completed with consideration of:
  - Whole life cost – the cost effectiveness, price and running costs of the service
  - Technical merit and functional fit
  - After-sales-service-management
  - Non-functional characteristics
- 5.6. Workbooks has been selected as the preferred supplier to implement and support a Customer Relationship Management system for an initial contract for 2 years with a 1 + 1 year renewal option.

## **6. GDPR and Data Privacy**

- 6.1. The MPS is subject to the requirements and conditions placed on it as a 'State' body to comply with the European Convention of Human Rights and the Data Protection Act (DPA) 2018. Both legislative requirements place an obligation on the MPS to process personal data fairly and lawfully in order to safeguard the rights and freedoms of individuals.
- 6.2. Under Article 35 of the General Data Protection Regulation (GDPR) and Section 57 of the DPA 2018, Data Protection Impact Assessments (DPIA) become mandatory for organisations with technologies and processes that are likely to result in a high risk to the rights of the data subjects.
- 6.3. The Information Assurance and Information Rights units within MPS will be consulted at all stages to ensure the project meets its compliance requirements.
- 6.4. The project does not use currently personally identifiable data of members of the public, so there are no current GDPR issues to be considered. If the project uses personally identifiable data of members of the public at a later date DPIAs will be completed as needed.

## **7. Equality Comments**

- 7.1. The proposed SaaS solution supports and is compatible with the web content accessibility guidelines (WCAG 2.1)
- 7.2. This proposed project contributes towards the Anchor Institutions Charter because the Metropolitan Police Service will be supporting all communities in London and helping to narrow inequalities by enabling faster/improved access to the full range of Language services available.
- 7.3. Under the Equality Act 2010, the Metropolitan Police Service must have due regard to the need to eliminate discrimination.

- 7.4. Sign language interpreting services must also be provided to people who are deaf or have a hearing impairment. British Sign Language (BSL) is commonly used in the UK, but interpreting services in other sign languages may also be required. A language professional must be used if clear and concise communication is not possible without them, and/or if a person who is deaf or has a hearing impairment requests it.
- 7.5. This system will hold the database to ensure this is met by the Metropolitan Police Service.

## **8. Background/supporting papers**

- 8.1. Report.

**Public access to information**

Information in this form (Part 1) is subject to the Freedom of Information Act 2000 (FOIA) and will be made available on the MOPAC website following approval.

If immediate publication risks compromising the implementation of the decision it can be deferred until a specific date. Deferral periods should be kept to the shortest length strictly necessary.

**Part 1 Deferral:**

Is the publication of Part 1 of this approval to be deferred? NO

If yes, for what reason:

Until what date: n/a

**Part 2 Confidentiality:** Only the facts or advice considered as likely to be exempt from disclosure under the FOIA should be in the separate Part 2 form, together with the legal rationale for non-publication.

Is there a **Part 2** form – YES

**ORIGINATING OFFICER DECLARATION**

*Tick to confirm statement (✓)*

**Financial Advice:**

The Strategic Finance and Resource Management Team has been consulted on this proposal.

✓

**Legal Advice:**

The MPS legal team has been consulted on the proposal.

✓

**Equalities Advice:**

Equality and diversity issues are covered in the body of the report.

✓

**Commercial Issues**

The proposal is in keeping with the GLA Group Responsible Procurement Policy.

✓

**GDPR/Data Privacy**

- GDPR compliance issues are covered in the body of the report.
- A DPIA is not required.

✓

**Drafting Officer**

Craig James has drafted this report in accordance with MOPAC procedures.

✓

**Director/Head of Service:**

The Acting Chief Finance Officer has reviewed the request and is satisfied it is correct and consistent with the MOPAC's plans and priorities.

✓

**Chief Executive Officer**

I have been consulted about the proposal and confirm that financial, legal and equalities advice has been taken into account in the preparation of this report. I am satisfied that this is an appropriate request to be submitted to the Deputy Mayor for Policing and Crime.

**Signature**



**Date 12/04/2022**





MAYOR OF LONDON  
OFFICE FOR POLICING AND CRIME

**Technology to allow Language & Cultural Services (LCS) to deliver 24/7  
Language Support to all of the MPS as required by PACE**

**MOPAC Investment Advisory & Monitoring meeting 01/04/22**

**Report by Marie Heracleous on behalf of the Chief of Corporate Services**

**Part 1 – This section of the report will be published by MOPAC. It is  
classified as OFFICIAL – PUBLIC**

***EXECUTIVE SUMMARY***

1. The LCS team are facing increased demands for their services from officers on the frontline and this situation risks a degradation in service unless the existing CRM system is replaced. With an increase in officer numbers, this will also lead to greater demand.
2. The present CRM system used by is no longer fit for operational purpose due to its unreliability and slow response times. It is no longer in support and over the last few years a team from Accenture have been required to keep it running. The code behind the existing system is unavailable so no new functionality can be added and a replacement system is urgently required.
3. Since 2013 and the introduction of their current system, LCS has seen an increase of 47% in assignments and 178% increase in translation support. The introduction of the new system directly supports the community in enabling direct access to the appropriate language service more quickly in an emergency or non-emergency situation.

**Recommendations**

The Deputy Mayor for Policing and Crime, via the Investment Advisory and Monitoring meeting (IAM), is asked to:

**Approve...** The purchase of a new Customer Relationship Management system (CRM) for the Language and Cultural Services (LCS) team with a Capital spend of £376.4k to be funded from the MO11 Reserve

**Approve...** Ongoing Revenue cost of £69.7k in 2022/23 and £142.2k per annum from 2023/24 which will be funded from the MO11 BAU revenue budget.

**Approve...** Procurement Route and the Award to Workbooks (the procurement route has been completed by MPS Commercial Services)

### **Time sensitivity**

A decision is required from the Deputy Mayor by 15/04/2022 This is because...

We have an existing CRM system that is not currently fit for Operational service. We also have a time pressure to introduce the new solution due to the fragility of the existing system which needs to be de-commissioned before January 23 to avoid having to move it out of its existing datacentre Eagle.

### **Non-confidential facts and advice to the Deputy Mayor for Policing and Crime**

#### **Introduction and background**

The Language and Cultural Services (LCS) team are responsible for delivering the growing demand for linguistic services across The Metropolitan Police Service (MPS). This work involves providing our frontline officers with access to approved interpreters and translators.

At present LCS use a Microsoft Dynamics based CRM System built by Fujitsu that went live in 2013. This system manages the booking and deploying of interpreters and translators; through to retaining their qualifications, vetting records and feedback reports; as well as make and record payments to interpreters and translators for their service. But the system is no longer fit for operational purpose due to its unreliability and slow response times. Over the last few years a team from Accenture have been required to keep it running and so a replacement system is urgently required.

A fundamental problem with the existing Fujitsu system is that the underlying upgrade code is not available making it impossible to add new functionality. It is also incompatible with Windows 10 mobile devices and does not fully comply with the General Data Protection Regulation (GDPR) that came into force on 25th May 2018. The present situation is no longer tenable for LCS as the increased demand for their services means they need to exploit new technology, increase capacity and make better use of existing staff rather than using time consuming work arounds when the system fails or hangs. The new system is required to meet the LCS customer expectations for a fast response and to enable efficiency and customer drives within the team.

#### **Issues for consideration**

- Ongoing Revenue cost of £69.7k in 2022/23 and £142.2k per annum from 2023/24 which will be funded from the MO11 BAU revenue budget.
- The present CRM platform is no longer in formal support from the original developers and support is provided on a 'best endeavour's' basis. Reliability is an issue, which is causing disruption to the service provided to frontline officers and payment delays to interpreters and translators.
- The absence of the original developer's code means that the present CRM cannot be developed and neither can it take advantage of new technology that would help LCS to become more efficient and improve their service.

- The new system will enable the streamlining and automation of the LCS processes, will integrate with MS Office and eliminate the rekeying of information and manual effort.
- The new system will ensure compliance with the General Data Protection Regulation (GDPR)
- MO11 LCS have secured funding from their own budget for the new CRM System which includes formal support agreements.
- The integration strategy between the new CRM and the MPS infrastructure has not been fully defined but this will not impact on the functionality of the new system.

### **Contributes to the MOPAC Police & Crime Plan 2017-2021<sup>1</sup>**

#### **Improved Decision Making:**

Getting the right information to the right people at the right time to improve decision making. Track key information with robust Management Information data on trends for the MPS.

- Faster response times
- Self-service calendars and claims process
- All interactions and information held in one place
- Clear and simple reporting tool
- Reduce manual administration tasks

### **Financial, Commercial and Procurement Comments**

The paper is seeking the approval to procure and award:

Our strategic route to market is via G-Cloud 12 on the Digital Marketplace. MPS Commercial Services have conducted a search on the Digital Marketplace to return a shortlist of potential products. All search results were saved on the Digital Marketplace for audit purposes.

This framework allows UK public sector bodies to choose and purchase cloud computing services covering infrastructure, platform, software, and specialist cloud services. This is a quicker process, and the suppliers are already prequalified. This is a simple, low risk procurement route.

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<sup>1</sup> [Police and crime plan: a safer city for all Londoners | London City Hall](#)

The Business reviewed shortlisted suppliers' documents (to include Supplier Service Offering, Supplier Terms and Conditions and Supplier Pricing Schedule) on the Digital Marketplace to assess suitability against the requirement and determine the Service that best meets LCS' needs.

A down-selection and evaluation process has been completed with consideration of:

- Whole life cost – the cost effectiveness, price and running costs of the service
- Technical merit and functional fit
- After-sales-service-management
- Non-functional characteristics

Workbooks has been selected as the preferred supplier to implement and support a Customer Relationship Management system for an initial contract for 2 years with a 1 + 1 year renewal option.

A Capital spend of £376.4k to be funded from the MO11 Reserve and an ongoing Revenue cost of £69.7k in 2022/23 and £142.2k per annum from 2023/24 that will be funded from the MO11 BAU revenue budget.

These revenue costs are additional costs as licensing due to moving to Digital Policing's Cloud Strategy. The maintenance costs will continue to be covered by Digital Policing.

## **Legal Comments**

A Crown Commercial Services framework agreement is in place as the preferred route to market for the proposed contract award.

An award of this product has been procured in accordance with MOPAC's Regulations and the route to market is compliant with these Regulations. There are no personnel implications and TUPE will not apply to this procurement action.

This new system will efficiently allow LCS to continue to fulfil their legal PACE obligations by allocating and deploying language resources within the communities of London. Suspects, victims and witnesses have the right to be able to communicate effectively throughout criminal proceedings and to have language services supplied if needed.

Under the Ministry of Justice (2015) Code of Practice for Victims of Crime, a victim or witness is entitled to request interpretation and/or translation services in a language they understand – for example, when reporting a crime, being interviewed or giving evidence.

Suspects also have the right to have access to language services under the Police and Criminal Evidence Act 1984 (PACE) and PACE Code C, 13 and Code H for terrorism matters. See also the Directive 2010/64/EU of the European Parliament and of the Council of 20 October 2010.

The Human Rights Act 1998 and Article 6 (3) of the European Convention on Human Rights (ECHR) guarantees the right to have the free assistance of an interpreter if the accused cannot understand or speak the language used in court.

## **Equality Comments**

The proposed SaaS solution supports and is compatible with the web content accessibility guidelines (WCAG 2.1)

This proposed project contributes towards the Anchor Institutions Charter because we will be supporting all communities in London and helping to narrow inequalities by enabling faster/improved access to the full range of Language services available. Under the Equality Act 2010, the Metropolitan Police Service must have due regard to the need to eliminate discrimination.

Sign language interpreting services must also be provided to people who are deaf or have a hearing impairment. British Sign Language (BSL) is commonly used in the UK, but interpreting services in other sign languages may also be required. A language professional must be used if clear and concise communication is not possible without them, and/or if a person who is deaf or has a hearing impairment requests it.

This system will hold the database to ensure this is met by The Metropolitan Police Service.

### **Privacy Comments**

The MPS is subject to the requirements and conditions placed on it as a 'State' body to comply with the European Convention of Human Rights and the Data Protection Act (DPA) 2018. Both legislative requirements place an obligation on the MPS to process personal data fairly and lawfully in order to safeguard the rights and freedoms of individuals.

Under Article 35 of the General Data Protection Regulation (GDPR) and Section 57 of the DPA 2018, Data Protection Impact Assessments (DPIA) become mandatory for organisations with technologies and processes that are likely to result in a high risk to the rights of the data subjects.

The Information Assurance and Information Rights units within MPS will be consulted at all stages to ensure the project meets its compliance requirements.

The project does not use currently personally identifiable data of members of the public, so there are no current GDPR issues to be considered. If the project uses personally identifiable data of members of the public at a later date DPIAs will be completed as needed.

### **Real Estate Implications**

No impact on real estate as a result of this proposed project

### **Environmental Implications**

There are no environmental impacts from the proposed project.

It is generally recognised that cloud-based systems can save carbon because servers are optimised as they are not simply allocated to single requirements.

## **Background/supporting papers**

Technology to allow Language & Cultural Services to deliver 24/7 Language Support to all of the MPS as required by PACE - Business Justification Paper

Report author: Rebecca Wraight – Head of Language Services MO11  
Graham Seamons – Business Engagement Manager Digital Policing

**Part 2 – This section refers to the details of the Part 2 business case which is NOT SUITABLE for MOPAC Publication.**

The Government Security Classification marking for Part 2 is:  
OFFICIAL-SENSITIVE [OPERATIONAL]

Part 2 The relevant sections under the FOIA that would exempt this information from disclosure:

- **Section 40 Personal Information**

The paper will cease to be exempt until 31 December 2024.

Any request for information under FoIA would need to be assessed on a case by case basis, no matter what or when the original decision was made, as the circumstances may have changed e.g. information no longer commercially sensitive.