



Police Headquarters
London Road
DEVIZES
Wiltshire
SN10 2DN
disclosure@wiltshire.police.uk

Date 01/11/2023

Our ref **FOI 2023/984**

I write in connection with your request for information, dated 12/10/2023, concerning translation and interpreting services.

I am required by the Freedom of Information Act 2000 to handle all requests in a manner that is blind as to the identity and motives of the requestor. Any information released as a response to a request is regarded as being published and therefore in the public domain without caveat.

Your request for information has now been considered and it is not possible to meet your requirements in full.

You wrote (with our response):

1. Please confirm your overall spending on Translation and Interpreting Services, for each of the financial years:
 - a. 2020-2021: £120,450.00
 - b. 2022-2023: £99,423.00

2. Please provide a breakdown of languages for the last 12 months

June 2022 – May 2023

Language
Polish
Romanian
Albanian
Portuguese
Arabic

Kurdish / Kurdish Sorani
Bulgarian
Turkish
Bengali
Portuguese (Brazilian)
Farsi (Persian)
Konkani
Tigrinya
Hindi
Spanish
Lithuanian
Italian
French
Punjabi
Vietnamese
Mandarin
Kurdish Sorani
Latvian (Lettish)
Chinese Mandarin
Malayalam
Brazilian Portuguese
Tamil
Nepali
Urdu
Russian
Twi

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Pashtu
BSL (British Sign Language)
Farsi
Somali
Audio into Text Transcription
Cantonese
Greek
Tagalog (Filipino)
Dutch
Georgian
Pashto
Ukrainian
Hungarian
Macedonian
Slovak
Fijian
Nepalese
Chinese Cantonese
Sylheti
Uzbek
Tagalog
Thai
Latvian
Amharic
Kurdish Bahdini
Telugu

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Czech
Kurdish Kurmanji
Mandinka
Afghan Pashtu
English
Sudanese Arabic
German
Swahili
Shona
Arabic (Moroccan/Tunisian/Algerian/Libyan)
Ashanti (Asante)
Hungarian Sign Language

3. What languages were your suppliers not able to supply in 2022?

Wiltshire police are exempting question 3, this particular question by virtue of Section 43 of the Act (Commercial Interests). S43 states that information is exempt information:

If it constitutes a trade secret

If its disclosure would or would likely to prejudice commercial interests of any person (including the public authority holding it)

This exemption is a qualified and class based exemption. A class based exemption means the legislators, when writing this piece of legislation, considered that the release of this type of information would cause harm to either the authority or individuals involved. Accordingly therefore the authority (i.e. Wiltshire Police) does not need to communicate the harm in disclosure.

In view of the fact that Section 43 (Commercial Interests) is a qualified exemption, I am required to apply a public interest test.

(Please see below)

4. Which external supplier(s) do you currently use to deliver your interpreting and translation services ? [DA Languages](#)

5. Are you able to provide approximate fee / interpreting session for:
a. In-person/face to face interpreting

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- b. Telephone interpreting
- c. Video interpreting

Wiltshire police are exempting question 5, this particular question by virtue of Section 43 of the Act (Commercial Interests). S43 states that information is exempt information:

If it constitutes a trade secret

If its disclosure would or would likely to prejudice commercial interests of any person (including the public authority holding it)

This exemption is a qualified and class based exemption. A class based exemption means the legislators, when writing this piece of legislation, considered that the release of this type of information would cause harm to either the authority or individuals involved. Accordingly therefore the authority (i.e. Wiltshire Police) does not need to communicate the harm in disclosure.

In view of the fact that Section 43 (Commercial Interests) is a qualified exemption, I am required to apply a public interest test.

(Please see below)

6. If you outsource the provision of interpreting services to an external provider, could you please confirm:

a) Whether the provider was contracted via a national framework? If so, which one? Yes, the National Police Language Services DPS Framework set up by Leicestershire Police

b) When does the current contract expire?

The current service provision commenced on 20th June 2022 for an initial period of 2 years, with the option to extend a further 2 years

c) Is there is an exclusivity clause, which would prevent you from piloting new cost saving interpreting services during the duration of your contract with your existing provider?

The current Contract includes the provision for sourcing all Interpreting and Translation requirements. Any such pilot could be considered during any re-tendering phase but would need to be approved for use under the National Police Language Services DPS Framework set up by Leicestershire Police

7. From which budget within your organisation are interpreting services funded? Crime Standard and Justice

8. Where do you advertise your tenders? If you do not do a full tender / which frameworks would you use?

National Police Language Services DPS Framework set up by Leicestershire Police. Any Tender opportunities are communicated to approved Suppliers on the Framework Lot used.

9. What is the start and end date for either the framework or direct contracts you have with interpreting and translation supplier(s)?
The current service provision commenced on 20th June 2022 for an initial period of 2 years, with the option to extend a further 2 years.

10. Please provide the name and email of the contract manager for the service
Hannah Di Stefano (Regional Procurement Lead for this service area)

Senior Category Buyer (Professional Services) - South West Police Procurement Service (SwPPS)

E-mail: hannah.distefano@devonandcornwall.pnn.police.uk

11. If we would like to engage in conversation with a member of staff in your organisation to discuss the innovation we propose to develop, who would be the most suitable person to approach?

Hannah Di Stefano (Regional Procurement Lead for this service area)

Senior Category Buyer (Professional Services) - South West Police Procurement Service (SwPPS)

E-mail: hannah.distefano@devonandcornwall.pnn.police.uk

For questions 3 and 5:

Public Interest Test under Section 43

Considerations Favouring Disclosure:

Wiltshire Police is accountable for the public funds that it spends. There is a legitimate public interest in knowing that Wiltshire Police's financial resources are used appropriately and that value for money is achieved.

Considerations Favouring Non- Disclosure:

Disclosure of this information is likely to damage the relationship between Wiltshire Police and the service providers involved and prejudice their commercial interests. This is because the release of information that may identify unit costs of goods or a service purchased by means of a contract made between Wiltshire Police and a supplier will prejudice Wiltshire Police's position in future negotiations.

Balancing Test:

I have carefully considered your request for information and am acutely aware that any information disclosed under the Freedom of Information Act is information disclosed to the world, not just you, the requester. In this case the right of the public to know needs to be weighed against the damage caused to the service provider/s and ultimately Wiltshire Police itself.

It has been argued in the points favouring disclosure that there is an identifiable public interest in knowing that Wiltshire Police obtains value for money when outsourcing services, especially in the current financial climate, however the force's interests might be jeopardised by release of information that relates to sensitive commercial information held about business, financial or contractual issues, preventing the force from obtaining the best

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deal available. While there is also a legitimate public interest in knowing that Wiltshire Police tenders for services and contracts fairly and correctly, any release of this tendering information, which details fully the unit cost of various examinations, would cause harm with regard to the relationship between Wiltshire Police and the provider. Disclosure would reveal to competitors and anyone else who wishes to know, the unit cost

Section 17 of the Freedom of Information Act 2000 requires Wiltshire Police, when refusing to provide information (because the information is exempt) to provide you the applicant with a notice which: (a) states that fact, (b) specifies the exemption in question and (c) states (if that would not otherwise be apparent) why the exemption applies. In accordance with the Freedom of Information Act 2000 this letter acts as a Refusal Notice for those aspects of your request.

Exemption applied:

Section 43 of the Act (Commercial Interests)

Wiltshire Police would like to thank you for the interest that you have shown in the Force.

Yours sincerely

Force Disclosure Decision Maker



Wiltshire Police offers a re-examination of your case under its review procedure.



Force Disclosure Unit

Wiltshire Police HQ, London Road, Devizes, Wiltshire SN10 2DN
Telephone 101 ext 62005

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Freedom of Information Request Appeals Procedure

1. Who Can Ask for a Review

Any person who has requested information from Wiltshire Police, which has been dealt with under the Freedom of Information Act, is entitled to complain and request an internal review, if they are dissatisfied with the response they received.

2. How to Request a Review

Requests for review of a Freedom of Information request must be made in writing to the:

Force Disclosure Unit
Wiltshire Police Headquarters,
London Road, Devizes,
Wiltshire,
SN10 2DN

Email at disclosure@wiltshire.police.uk.

The reference number, date of the request and details of why the review is being requested must be included. Requests for review should be brought to the attention of the Force Disclosure Unit within 20 working days of the Force's response to the original Fol request.

3. Review Procedure

Receipt of a request for review will be acknowledged in writing to include confirmation of the reasons for the review. The review will be conducted by another Decision Maker, who is independent from the original Decision Maker. The Force Disclosure Unit will set a target date for a response. The response will be made as soon as is practicable with the intention to complete the review within twenty working days. In more complex cases the review may take up to 40 working days.

The Independent Decision Maker will conduct a review of the handling of the request for information and of decisions taken, including decisions taken about where the public interest lies in respect of exempt information where applicable. The review enables a re-evaluation of the case, taking into account the matters raised by the complaint.

4. Conclusion of the Appeal

On completion of the review the Independent Decision Maker will reply to the complainant with the result of the review. If the complainant is still dissatisfied following the review they should contact the Information Commissioner to make an appeal. The Information Commissioner can be contacted via the following details:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire

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SK9 5AF
Tel: 01625 545 700
Fax: 01625 524 510
Email: mail@ico.gsi.gov.uk

Please note that the ICO's offices will be closed for the foreseeable future and are therefore unable to receive correspondence via post.

If you should wish you contact them, please visit <https://ico.org.uk/global/contact-us/>