

June 2023

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Headline summary

- The 999 BSL Emergency Video Relay Service, first introduced on 17 June 2022, is performing effectively and to a high-quality standard, providing critical access to the emergency services for Deaf British Sign Language (BSL) users across the U.K. for the first time in history. Sign Language Interactions (SLi) complies with the Ofcom Approval Criteria for Emergency Video Relay Service Providers on an ongoing basis, as detailed later in this report.
- In the first year, the service has received over **17,000 calls** (an average of **47 calls** per day) and despite some significant challenges that SLi have faced (which are detailed in the next section), the most typical* caller waiting time was just **4 seconds**.
- Through articles published in the press and shared on social media channels over the last year, we are thrilled to have learned (and confirmed) that to date, at least **five lives** were saved through use of the 999 BSL service. We expect that the actual number of lives saved could be much higher and we have recently launched a fresh campaign asking the public to share their stories with us about how 999 BSL has saved their/other people's lives, with the objective of spreading awareness about this important service.

Service level challenges

- SLi experienced some challenges during the first year of service, which in some cases affected our ability to meet our primary KPI set by Ofcom (percentage of calls answered within 5 seconds, 'PCA-5 %', as specified in the Approval Criteria), including:
 - **Nuisance callers:** Nuisance callers were, unfortunately, the main contributor to this and are sadly causing disruption to the service on an almost daily basis. We have added a dedicated section further below to explain in more detail the impact and the work that SLi is doing to combat this ongoing problem.
 - **Hearing callers:** We regularly receive calls from hearing people, who mistakenly think that the service is a way for anyone to contact the emergency services via video. In some cases, those hearing callers do have real emergencies, and our interpreters therefore connect the caller through to the relevant Emergency Authority. These interactions affect our interpreting capacity for BSL users as the interpreter is unable to leave the interaction without all legs of the call ending.
 - **Size/scale:** The size/scale of the 999 BSL service is clearly many times smaller than the 999-voice service, which shares the same primary KPI (by way of example, 999 BSL service receives on average 47 calls per day, whereas the 999-voice service receives an average of more than 100,000 calls per day). Interpreter resourcing requirements on the 999 BSL service are therefore *comparatively* low, meaning that SLi are more sensitive to sudden increases in incoming call volume (often driven by nuisance callers) and that whilst our 'overflow' interpreting resource can answer these calls, unfortunately these calls sometimes result in being answered outside of the 5-second target timeframe.
 - **Interpreter behaviour:** To a lesser extent, the low volume of calls on the service also means that interpreters can sometimes go for extended periods of time, which can in extreme cases be hours, without receiving a call. The experience for our interpreters is obviously very different than that of a 999-voice handler, who might expect to be answering the next incoming call within just a few seconds of their previous call finishing.

- SLi has responded to these challenges by taking some key actions to continually improve service performance, including:
 - Working with British Telecom (BT), Emergency Authorities (EA) and Ofcom to discuss the ongoing issue of nuisance callers in order to handle these in the most appropriate way, to safeguard the service for those who really need it.
 - Several technical and procedural changes, which have allowed for faster speed of answer by our interpreters.
 - Further development of detailed regular internal reporting, including root cause analysis and corrective measures where required.
 - Regular internal meetings to review service performance and make adjustments where necessary.
 - Creation and maintenance of a detailed action plan (shared monthly with Ofcom) to track key actions required to continually improve the service.
 - Recruiting a dedicated 999 BSL lead interpreter within SLi whose responsibilities include: (i) supporting the interpreting team, (ii) making sure procedures are followed, (iii) provide feedback internally on any issues that arise (iv) track interpreter speed of answer performance, (v) support the team to implement improvements to the service.
 - Providing ongoing training to our 999 BSL interpreters regarding best practices for the quickest possible speed of answer.
 - Increasing the pool of SLi interpreters able to work on the 999 BSL service by 60%, giving SLi a larger set of interpreters from which to staff the service, and take overflow calls.
 - Conducting training with interpreters on how to stay alert and ready to answer the next incoming call quickly, particularly during shifts with low call volumes.
 - Making several updates to the 999 BSL website to make it even more clear that the service is for Deaf British Sign Language users only.
 - Making sure resources and interpreters are always appropriately supported with the opportunity of having a debrief after a call if needed. This is available 24/7.

As can be seen in the table in Appendix 1, these actions have driven a sharp improvement in the KPI 'PCA-5 %' achieved, particularly from the start of Q4 2022 and despite large increases in the number of incoming calls received each month. SLi continue to strive to achieve the KPI set by Ofcom, although feel that progress towards this target is often hampered by factors outside of our control (such as nuisance callers, as detailed below).

Nuisance callers

- The service has been negatively impacted over the last year by a very high number of nuisance and/or repeat callers. These types of callers are very disruptive to the service as they tie-up our interpreters, preventing them from being able to answer other incoming 999 BSL calls and consequently increase waiting times for those callers.
- The vast majority of these callers are hearing and do not need to use the 999 BSL service.
- In extreme cases we have received 30+ calls from the same caller within a very short time period.
- A robust procedure was established upon launch of the service to ensure callers are dealt with fairly under reasonable terms of use, and this is constantly being reviewed, with suggestions made to reduce access for those who do not need it.
- Efforts have been made by SLi to propose some alternative procedures for dealing with hearing callers to the service, whether nuisance, lewd, abusive, or mistaken calls, to ensure the service is safeguarded for Deaf BSL users.
- There has been significant impact to the interpreters who have experienced callers who are engaging in lewd acts on screen, and callers who speak or type hate filled messages that are often personal and targeted to the interpreter they see on screen. Since all calls are recorded, recordings can be passed to the police upon request and may be used as evidence against nuisance callers.

Quality Assurance

As stated in the Ofcom Approval Criteria, SLi has a responsibility for the quality of the service. In order to ensure we are providing the best possible service, we undertake the following ongoing training and quality checks on our team of interpreters.

- Initial screening to ensure in addition to the minimum criteria (qualified and registered with NRCPD and 3 years post qualification experience), the person is also suited to working in high pressure environments and can remain calm, as well as providing good quality interpretation.
- Initial training for anyone joining the team, including written documents, e-learning, and webinars. This also includes an induction with our Lead Interpreter, and a chance to practise using our systems prior to their first shift.
- Ongoing development training for the team to continue to improve their interpreting skills.
- Quarterly Reflective Practice groups where interpreters can get together, share best practice and learn from each other.
- Opportunities to debrief after difficult 999 BSL calls, allowing interpreters to reflect on their practice.
- Monthly Quality Assurance checks of at least four 999 BSL calls, with feedback provided to the interpreter in question.

Collaboration

- Since launch, we have met with Ofcom and BT (separately) on a monthly basis to review the performance of the service and discuss any issues that have arisen. We would like to thank our colleagues at Ofcom and BT for their invaluable support during the first year of this critical service. We look forward to continuing this relationship next year and beyond.

* the use of the word 'typical' refers to the median value.

Ofcom's formal approval of SLi as provider of the Emergency video relay service (subsequently named 999 BSL) can be found here:

https://www.ofcom.org.uk/_data/assets/pdf_file/0021/231546/emergency-video-relay-statement.pdf

In accordance with our requirement to comply with full accountability and transparency regarding the performance of the service, details of the approval criteria and KPI's are included below:

| Section | Title | Text | SLi's comments |
|---------|-------------------------------------|--|---|
| 1 | General Compliance | The service must be an Emergency Video Relay Service as referred to in the General Conditions and must be capable of satisfying all the requirements set out in the Emergency Video Relay General Condition at C5. 'Emergency Video Relay Service' means any service which: | SLi confirms it operates an Emergency Video Relay Service (as referred to in the General Conditions) and satisfies on an ongoing basis the requirements set out in the Emergency Video Relay General Condition at C5, including those related to accessibility of the service, communication speeds and the ability for the End-User to communicate via text. |
| | | (a) for the purposes of requesting and receiving emergency relief from Emergency Organisations, provides British Sign Language translation and relay facilities for emergency communications to be conveyed via video between any End-User and Emergency Organisations; | |
| | | (b) is capable of being accessed by End-Users of the service from readily available compatible terminal equipment with video capabilities, including smartphones and computers or tablets; | |
| | | (c) provides facilities for access to Emergency Organisations and is available twenty-four hours a day, seven days a week; | |
| | | (d) insofar as reasonably practicable, allows for communication between End-Users of the service at speeds equivalent to voice communications; | |
| | | (e) provides a means of communicating by text in conjunction with video relay. | |
| 2 | Accountability and reporting | The service provider must monitor and report to Ofcom, every quarter, on its operation. The report must be in a form specified by Ofcom and must include the following information: | SLi confirms that it has reported to Ofcom quarterly and also on a monthly basis since the service launch in June 2022 about the operation of the service. The data provided by SLi includes those listed in this requirement and is based upon the reporting criteria published separately by Ofcom. A subset of those reporting metrics is included in Annex 1 of this Annual Report. |
| | | a) number of app downloads; | |
| | | b) number of emergency communications; | |
| | | c) average speed of answering, measured in 15-minute intervals; and | |
| | | d) number of complaints and information about the nature of the complaint (without sharing or publication of details that could identify any complainant). | |
| | | The provider must also publish an annual report covering compliance with the Approval Criteria and any related issues as directed by Ofcom. | |
| 3 | Access | The service provider must do the following: a) Make provision for End-Users to access the Emergency Video Relay Service via a dedicated app and a dedicated website, free of charge (including but not limited to the app itself being available free of charge). | SLi provide End-Users access to the service via dedicated 999 BSL apps available on both iOS and Android, plus through the website at www.999bsl.co.uk |
| | | b) Ensure clear and user-friendly instructions on how to use the Emergency Video Relay Service are made available in both British Sign Language (BSL) and English on the app and the website. | SLi confirms that clear and user-friendly instructions are available in both languages via the apps and website and can be found at: (i) https://999bsl.co.uk/how-to/ and at https://999bsl.co.uk/faqs/ |

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| | | <p>c) Ensure, where technically feasible, that the incident location information is automatically obtained from the device being used by the End-User in an efficient and timely way e.g. automatically via the app or website. The validity of the incident location information must always be verified with the End-User in BSL.</p> | <p>SLi confirms that <i>where permitted by the End-User in their app/device settings</i>, the incident location is automatically obtained from the device being used by the End-User. SLi interpreters confirm validity of incident location information as part of their standard call-answering procedure.</p> |
| | | <p>d) Maintain a system whereby telephone numbers and/or other contact information from the End-User are obtained to enable call-backs and/or other contact to be made. The retention period for this information must be in line with the retention period used for other emergency relay services and the service provider must comply with all applicable data protection and privacy laws.</p> | <p>As part of its technical solution, SLi has a system which enables call-backs to be made to End-Users without the need to collect any personal information from them.</p> |
| | | <p>e) Liaise with regulated providers, including during the design and development phase of the service and/or app, with a view to facilitating zero-rating of data used in connection with the service and/or app.</p> | <p>SLi worked extensively with regulated telecoms providers during the first half of 2022 prior to launch to ensure that the SLi system architecture could allow for zero-rating of data used in connection with the service (but not other services that SLi provide). SLi provided regular communications to regulated providers and scheduled a dedicated testing period allowing those regulated providers the opportunity to make test calls to ensure that their own configurations to allow zero-rating of data were correct.</p> |
| | | <p>f) Ensure that the service shall be available to end-users <u>without any requirement to register</u> to use or access the service.</p> | <p>SLi confirms that there is no requirement for End-Users to register to access the service</p> |
| 4 | Operational matters | <p>All persons acting as interpreters for the Emergency Video Relay Service must:</p> <p>a) be on the National Registers of Communication Professionals working with Deaf and Deafblind People (NRCPD) register for qualified interpreters;</p> <p>b) have at least three years' post-qualification experience acting as a BSL interpreter in a range of settings; and</p> <p>c) have had a clear Disclosure and Barring Service (DBS) check within the last two years.</p> <p>The Emergency Video Relay Service must have a dedicated, well-lit and soundproofed video interpreting room. There should be restricted access to the room.</p> <p>The interpreter should be equipped with a suitable microphone and headset.</p> | <p>SLi confirms that all Operational matter requirements, relating to interpreters working on the service, their work environment and tools used to carry out their job are met prior to being allowed to work on the service. The requirements are also re-assessed on an ongoing basis to ensure continual compliance.</p> |
| 5 | Quality of service | <p>Emergency communications must be answered within 5 seconds 95% of the time, measured in 15-minute intervals.</p> <p>Emergency communications should not be subject to a handover from one interpreter to another unless they continue for more than 30 minutes.</p> | <p>Per the update published by Ofcom on its website on 13 January 2023, the reporting requirement was changed from 15-minute intervals to 24-hour periods, however there is still a requirement to record in 15-minute intervals. SLi includes this data in their monthly reports provided to Ofcom and an overall monthly Quality of service % value is included in Annex 1 of this Annual Report.</p> |

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| | | Regular bi-monthly quality of service checks of emergency communications must be carried out by senior interpreters retained by the Emergency Video Relay Service. | SLi confirms ongoing compliance with requirements related to: interpreter handovers, quality of service checks, recording and retention of video conversations |
| | | Video conversations must be recorded. Retention of any recording should 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 and the service provider must comply with all applicable data protection and privacy laws. | |
| 6 | Adequate resources | The service provider must be able to demonstrate that: a) it has sufficient funds, facilities and staff to provide the Emergency Video Relay Service and enable it to perform properly the administrative, technical and professional work associated with the tasks for which it has been appointed; | Financial information about SLi is included in their Annual Report available via the Companies House website. SLi staff the service to ensure that incoming calls are dealt with in a timely manner and in accordance with the agreement between SLi and regulated providers prior to service launch. |
| | | b) the systems deployed and managed by the service provider have sufficient technical resilience and resources to provide an uninterrupted service, so far as is technically feasible; and | SLi confirms that their systems provide an uninterrupted service, so far as is technically feasible. SLi's Network Operations Centre (NOC) conducts regular daily test calls into the system. Additionally, SLi have robust incident response procedures, should a technical issue arise. |
| | | c) it has appropriate provision for complaints handling. | SLi have clear signposting on the 999 BSL website to inform the general public how they can make a complaint and a formal complaints procedure to ensure that any and all complaints are handled in a fair and timely manner. |
| 7 | Provision on fair, reasonable and non-discriminatory terms | (1) The Emergency Video Relay Service provider must: a) undertake 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 or wholesaler and/or some other third party intermediary; and | SLi confirms that the 'FRAND' requirements listed were met as part of the contract process and will continue to be met as part of any ongoing contract requirements. |
| | | b) to ensure the inclusion of a clause in such contracts, documenting that the contract has been agreed on that basis. | |
| | | (2) If the Emergency Video Relay Service provider enters into a contract with an intermediary in respect of Emergency Video Relay, the Emergency Video Relay Service provider must: require as part of that contract, that the intermediary shall contract with Regulated Providers on a fair, reasonable and non-discriminatory basis; and that the intermediary shall ensure the inclusion of a clause in its contracts, documenting that the contract has been agreed on that basis. | |

ANNEX 1: SLi REPORTED KPI'S FOR JUNE 2022 – 2023

| Measure | 2022 | | | | | | | 2023 | | | | | |
|---|-------|-------|--------|-----------|---------|----------|----------|---------|----------|-------|-------|-------|-------|
| | June* | July | August | September | October | November | December | January | February | March | April | May | June |
| Total calls received | 907 | 1,237 | 1,072 | 980 | 1,031 | 1,442 | 1,901 | 1,291 | 1,324 | 1,699 | 1,730 | 2,079 | 1,760 |
| Percentage of calls answered within 5 seconds, 'PCA-5 %' (KPI 95%) | 23% | 21% | 20% | 32% | 54% | 62% | 66% | 69% | 74% | 69% | 72% | 69% | 70% |
| Percentage of calls answered within 20 seconds, 'PCA-20 %' | 80% | 77% | 84% | 83% | 89% | 88% | 90% | 94% | 93% | 89% | 91% | 89% | 89% |
| Number of complaints received | 0 | 0 | 0 | 0 | 1 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 1 |

1. As agreed with Ofcom, these metrics:
 - a. exclude calls that are abandoned/hung-up by the caller within 5 seconds (this is the same as for voice 999 calls)
 - b. exclude daily internal test calls made by SLi to test the functioning of the service & endpoints.
 - c. include all calls received into the service, including those deemed by SLi to be nuisance, lewd or harassing in nature.
2. All complaints received were dealt with in accordance with SLi 999 BSL complaints policy.
3. * June 2022 represents a partial-month since the service launched 17 June 2022