

Proposals to implement the new European Electronic Communications Code:
Association of Sign Language Interpreters consultation response

Question 14: Do you agree with our proposal to mandate emergency video relay for emergency communications to be accessed by end-users who use BSL?

ASLI does support Ofcom's efforts to explore what a 999VRS service may entail and bring about important changes that can benefit and safeguard vulnerable (deaf) citizens. However, ASLI views this approach as being inferior to a direct 999 video calling service, where an in-house staff can handle video BSL calls.

Although ASLI favours a more direct form of communication, ASLI also recognises the value and importance of working with Ofcom and VRS providers to establish a workable (and hopefully temporary) solution.

ASLI believes the role of the 999VRS interpreter must be reviewed and flexibility shown. The redefined role must recognise the interpreter's need to become involved in the call and react in ways that safeguard vulnerable people, for example generate their own questions to help the call-handler assess and expediently deal with the situation. The interpreter cannot be expected to strictly adhere to, or be measured against, the NRCPD code of conduct. Flexibility and regard for the difficulties for all involved must be considered.

ASLI is concerned around the well-being and protection of interpreters. Interpreters are not trained in the same way as call-handlers to deal with stressful subjects. The interpreter will also be exposed to more vivid communication through video-link, the interpreter may be able to witness and observe distressful scenes e.g. domestic violence or child abuse. In our view, it is vital Ofcom and VRS providers consult interpreters on the following matters:

- best practice in handling 999VRS calls
- establishment of clear guidelines support systems for interpreters (e.g. supervision and personal safety and well-being)
- additional training needed
- training of call-handling staff
- procedures and guidance with how to handle VRS calls from callers who come from a non-BSL background (e.g. incidental calls from people who can hear and not sign, deaf people who are non-signers, deaf people who use another signed language)

Question 15: Do you agree with our proposal that the obligation to provide emergency video relay free to end-users should be imposed on regulated firms that provide internet access services or number-based interpersonal communications services?

ASLI believes national emergency services have a duty to consult with deaf people on how best to serve them and implement direct forms of communication, e.g. a

video calling service managed by people (deaf or hearing) fluent in BSL. This is because direct forms of communication can offer greater expediency and benefit to the deaf citizen.

Question 16: Do you have any comments on our proposed approval criteria for emergency video relay services, or the proposed approval process?

ASLI believes it is necessary to discuss the following issues

1. What are the mechanisms for emergency services to return a 999 VRS call?
2. In an emergency scenario, the caller may need to switch from a VRS call to a VRI call, whereby an interpreting service is maintained and offered to officers/ paramedics/ fire service etc onsite. It would not be appropriate to place the interpreter in a situation where they cannot remain on the call to ensure the ongoing safety of a citizen
3. We recommend interpreters be given a choice to receive 999 calls.
4. Current ASLI guidance recommends interpreter with a minimum of 3 years experience works in VRS settings.