

‘TO BE UNDERSTOOD’: ARE THE POLICE DOING ENOUGH TO HELP VICTIMS WITH LOW PROFICIENCY IN ENGLISH REPORT CRIME?

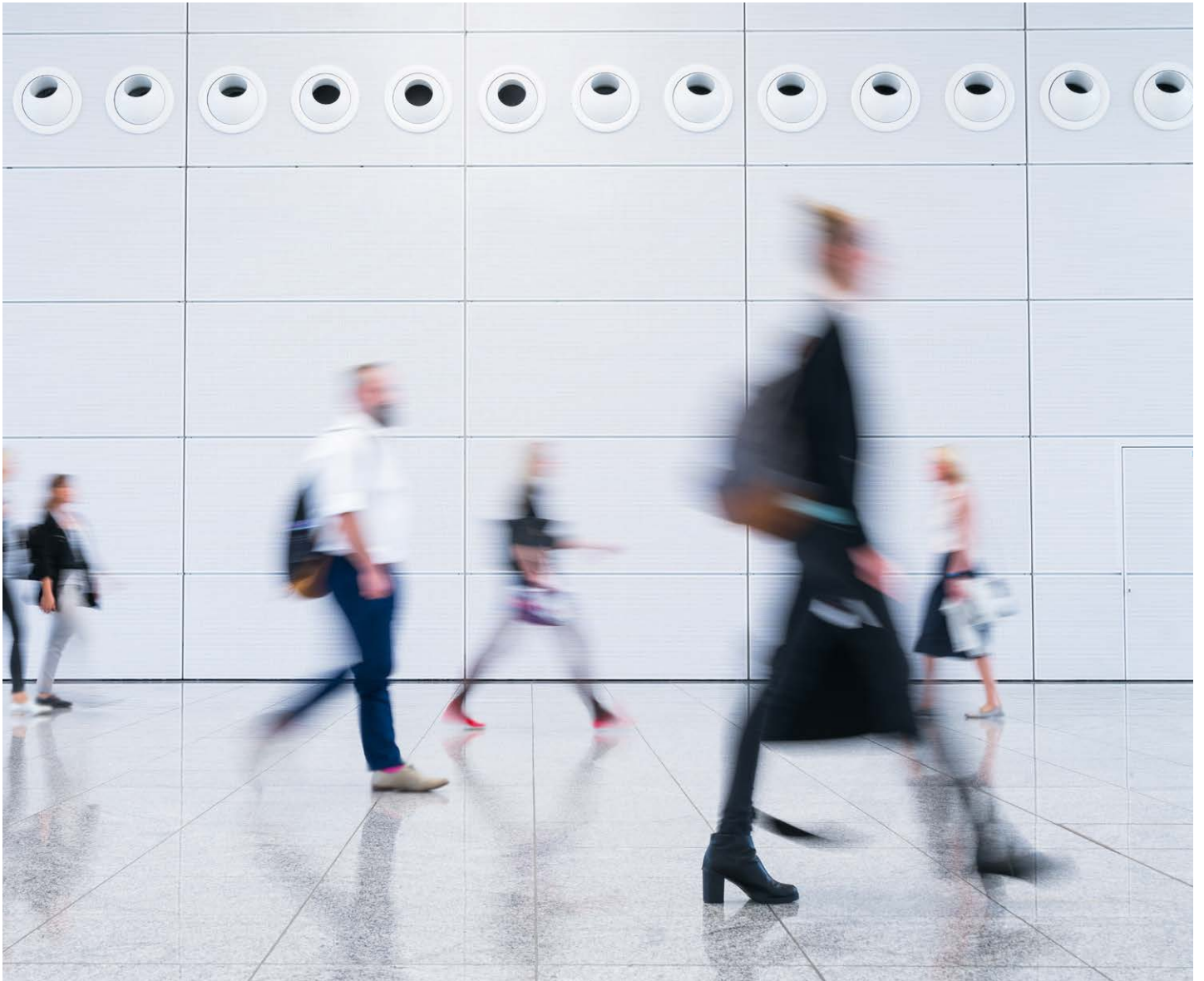


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INTRODUCTION

“Right 1: To be able to understand and to be understood.”

Code of Practice for Victims of Crime in England and Wales (the **Victims Code**)¹

- 1.1 Individuals that are victims of a crime in England and Wales have various rights when in contact with criminal justice agencies, including the right to language support if English is not their first language.
- 1.2 The Code of Practice for Victims of Crime in England and Wales (the **Victims Code**) contains the minimum standard of services that must be provided to victims of crime by various organisations, including all police forces in England and Wales.² The Victims Code states that a victim has the right to be given information in a way that is easy to understand and to be provided with help to be understood. The Victims Code also states that, where necessary, victims should be provided with access to interpretation and translation services free of charge. This is crucial as, according to the Office for National Statistics, as of 21 March 2021, over 1 million people living in England and Wales were unable to speak English well or at all.³
- 1.3 A research project was commenced in 2022 in order to understand how, in practice, police forces dealt with victims of crime with limited or no English language skills, particularly in light of the requirements of the Victims Code. This research was commissioned and led by Harrow Law Centre and Law Centres Network. Through their extensive work, both Harrow Law Centre and Law Centres Network have observed that individuals, in particular vulnerable women who are victims of violent crimes, face significant barriers in securing both assistance and justice due to large gaps in language support. In order to obtain information on how police forces across the UK treat victims who speak little to no English, various Freedom of Information (FOI) requests were sent to police forces across the UK.
- 1.4 Harrow Law Centre and Law Centres Network’s insight of dealing with victims of crime with communication barriers demonstrates the need for revision as to how victims of crime are able to access emergency public services. The treatment of victims of crime who do not speak English or struggle to communicate in English, as demonstrated by the anecdotes interspersed throughout this report, has been a recurring theme throughout their vital work and this has fed into the FOI requests made.
- 1.5 It has been a topic of public debate for some time now as to how effective and functional the criminal justice system is from both the perspective of the victim and the accused. Discussions over the lack of prosecutions and investigative failings have been subject to public critique for some time, with no clear resolution as to how matters can be resolved.
- 1.6 It is paramount that there can be a clear line of communication between the victim of a crime and the police. The relevance of this is to ensure that the investigative process can be as effective as possible. This requires that:
 - (a) The police are able to recognise the victim’s needs and the extent of their vulnerabilities from the outset of a complaint or from the point at which the police recognise an individual’s status as a victim (as opposed to an ordinary witness or a suspect).
 - (b) The police are able to provide the necessary level of support and signpost the victim to ancillary support services and agencies.⁴
 - (c) An accurate first account can be taken following a complaint to the police to ensure the accuracy and effectiveness of the investigation.

01_ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/974376/victims-code-2020.pdf

02_ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/974376/victims-code-2020.pdf

03_ <https://www.ons.gov.uk/peoplepopulationandcommunity/culturalidentity/language/bulletins/languageenglandandwales/census2021>

04_ This includes considering, for example, whether a victim of a crime is also a victim of modern slavery and a referral to the Single Competent Authority is required under the National Referral Mechanism Framework.



1.7 This report presents the findings of the FOI project and the responses received from the police forces.

HARROW LAW CENTRE

Harrow Law Centre opened in April 2010 to provide legal aid to vulnerable members of society, in reaction to the difficulties faced by disadvantaged groups in seeking access to specialist legal services. Harrow Law Centre was established as a not-for-profit organisation to ensure that all individuals, regardless of their background, can obtain access to quality legal advice.

Harrow Law Centre provides advice regarding a number of areas of law, including:

- Children and Young People's Services
- Crime
- Education
- Housing
- Immigration and Asylum
- Victims of Crime
- Welfare Benefits.

Harrow Law Centre, in this penultimate area, provides advice regarding both police complaints and criminal injuries compensation applications. Such interactions have led to a particular understanding of, and concern regarding, the experiences of victims speaking little to no English within the criminal justice system.

Harrow Law Centre and Law Centres Network would like to give particular thanks to Allen Overy Shearman Sterling LLP, Rishi Joshi (BCL Solicitors LLP), Rory Field (15 NBS Chambers), Ruth Broadbent (QEB Hollis Whiteman Chambers) and Markus Findlay (Doughty Street Chambers) for their kind support of this project and their contribution to this report.

LAW CENTRES NETWORK

Law Centres Network is the national membership organisation to which Harrow Law Centre and over 40 other Law Centres in England, Wales and Northern Ireland belong. The first such centre, the North Kensington Law Centre, was opened in July 1970 and over the following decades many others were founded across the country.

Law Centres are not-for-profit law practices. They employ solicitors and specialist caseworkers to provide free legal assistance to people in poverty and disadvantage. They also work to raise awareness of rights in the communities they serve and undertake social policy work to address the causes and drivers of legal need – including, among others, through campaigning, advocacy and strategic litigation.

Law Centres Network acts as the collective voice of Law Centres and their clients, representing them at all levels of government. It also supports Law Centres to better serve their respective communities, initiate and sustain new services, optimise their resources and develop their workforce. Law Centres Network also supports the network of Law Centres through collaborative projects, supporting its ICT infrastructure and digital and data development.

1. Executive Summary

FINDINGS

Standardised FOI requests were sent to 49 police forces across the UK. The FOI requests sought information on various issues, including:

- (1) Classification: whether police forces identified victims with limited to no English language skills (that is, victims with communication barriers)⁵ as vulnerable;
- (2) Training: the training provided to police officers on assisting victims and witnesses with communication barriers;
- (3) Engagement with vulnerable victims of crime: the number of victims with communication barriers that each police force recorded between 1 January 2020 and 1 January 2021; and
- (4) Interpretation and translation: the professional interpretation and translation services used by police forces between 1 January 2020 and 1 January 2021.

If police forces were unable to answer certain questions from the FOI requests, then they were required to explain why. Refined requests were sent to 22 of the police forces to address their reasons for not responding to some or all of the initial request. The responses provided to both the initial and the refined FOI requests were reviewed and the key findings are summarised in this report.

CLASSIFICATION

The police forces were asked for information on whether victims with communication barriers were classified as vulnerable victims under the Vulnerability Assessment Framework (VAF).⁶ The majority of respondents to these questions said that whether a victim was assessed as vulnerable was done on a case-by-case basis (to a large extent based on individual police officers' assessments). In most cases, a victim's language was one of the factors taken into consideration as part of that assessment but was not the definitive factor.

TRAINING

From the responses provided, police officers appear to attend a range of training courses. Some of these training courses appear to be mandatory, particularly for new recruits and those training to be detectives. A number of these training courses include modules on interacting with vulnerable victims and witnesses, with some addressing communication barriers. The training provided varied in length (from a few days to a number of weeks) and generally was provided face to face. Where training courses were identified as mandatory, police forces stated that robust procedures were in place to monitor attendance and assess attendees, although the pass/success rate was not always clear.

ENGAGEMENT WITH VULNERABLE VICTIMS OF CRIME

Corresponding to this ad hoc discretionary approach to identifying vulnerability, it appears that police forces either did not systematically record whether victims had communication barriers or used recording methods that made it difficult to assess and/or retrieve the number of victims with communication barriers. Most police forces did not systematically record the language capabilities of victims with communication barriers. In addition, while a large number of police forces reportedly provide written communications to victims with communication barriers in an easy-to-read or pictorial format, some of these forces also provide translations of certain materials in a range of languages.

INTERPRETATION AND TRANSLATION

Most respondent police forces organised translation and interpretation services for victims through a language services provider and sometimes under the Police-Approved Interpreter and Translator Scheme. Most respondent forces made financial provisions for translation and interpretation services, though not all had a specific budget for this purpose. Over half of respondent forces did not have a body of volunteers available to provide language support. Some respondent forces used officers or staff with language skills to provide translation/interpretation support. The use of commercial external suppliers, who are not subject to the FOIA 2000, has prevented us from capturing the profile of support that was provided.

⁰⁵ "Communication barriers" is not a defined term, but in this report it is used to refer to anyone with limited or no English skills.

⁰⁶ The VAF is a tool designed to identify vulnerability in all circumstances where the police have contact with victims, suspects and witnesses.

RECOMMENDATIONS

CLASSIFICATION

- Introduce a new entry field at the top of crime reports across all police forces recording:
 - whether English is the Complainant's first language;
 - any comments that police officers consider relevant to language issues (e.g. English is very good/English is good enough for initial complaint but may need an interpreter later); and
 - at the close of the case, whether an interpreter or any other measures to assist communication were employed at any point during the course of the case.

TRAINING

- Promote interactive training sessions for police officers, helping them to identify language and communication barriers.
- This training should be **compulsory** and **identical** for all police forces.
- The training should conclude with an exam and be rewarded with CPD points.

ENGAGEMENT WITH VULNERABLE VICTIMS OF CRIME

- Provide written communications in a wide range of languages and in easy-to-read/pictorial formats.
- These should be available digitally and in hard copy at community centres and public access points.

INTERPRETATION AND TRANSLATION

- Rely exclusively on accredited interpreters such as those on the PAIT scheme and avoid volunteer interpreters (e.g. police officers with the relevant language skills) to enhance the accuracy of victims' testimonies and protect police resources.

ACCOUNTABILITY

- Routinely publish language needs data, including new data as recommended above, through police forces' official statistics, transparency releases, and annual reports.
- Police and Crime Commissioners and National Police Chiefs' Council (NPCC) to integrate reporting on language needs as part of their accounting for spending and outcomes on victim support services.



2. METHODOLOGY

INITIAL REQUESTS

- 2.1 On 20 May 2022, FOI requests were sent to 49 police forces across the United Kingdom (listed in Appendix 3). These requests were standardised, with the same questions issued to each force. The questions included in the initial requests are listed in Appendix 1 to this report.
- 2.2 The FOI requests contained 22 questions across the following five topics:
 - (a) Classification: Each police force was asked whether it had identified and classified victims with communication barriers as “vulnerable” under the Vulnerability Assessment Framework. Each police force was also asked to specify the indicators (if any) used to decide whether having limited or no English language skills is a form of vulnerability.
 - (b) Training: Each police force was asked to provide information on the training courses that those police officers employed between January 2020 and January 2021 were required to attend on assisting victims and witnesses with communication barriers. If police officers were required to attend training, the police forces were asked to provide information on the content, duration and mode (e.g. in-person lecture or e-learning) of those mandatory training courses, the number of police officers who attended the courses and the number of courses officers were required to attend.
 - (c) Engagement with vulnerable victims of crime: Each police force was asked to provide information on the number of victims with communication barriers that they recorded between January 2020 and January 2021 and to provide information on how frequently the language capabilities of victims with communication barriers were recorded by police officers. They were also asked to provide information showing the form in which written communications were provided to victims with communication barriers.
 - (d) Professional interpretation and translation services: Each police force was asked to provide information on the number of interpreters the force used for interviewing and for translating key documents provided to victims with communication barriers between 1 January 2020 and 1 January 2021. The police forces were also asked to provide documents setting out the indicators used by officers when assessing the competency of interpreters and the procedures in place regarding accessing language assistance services under different circumstances. Each police force was also asked to provide information on the funding allocated to professional interpretation and translation services and to specify the number of volunteers each force had access to for providing language support.
 - (e) Ancillary: To the extent a police force was not able to answer a question, they were asked to explain why and to confirm whether the data requested exists. Please see paragraphs 2.6 to 2.11 for further information on why this might be relevant.

2.3 Four forces immediately responded to the initial request asking that it be: (a) amended to relate only to information already held by forces; and (b) reduced in length and complexity.⁷ To maximise the number of responses received, an alternate request was sent to these forces consisting of only 17 questions, as set out in Appendix 4 (the **Alternate Initial Request**). The difference in the number of questions asked has been accounted for when determining the proportion of questions that forces answered below.

2.4 Police forces were given 20 working days to respond.

INITIAL RESPONSES

2.5 Of the 49 forces that received the requests:⁸

(a) seven forces answered all the questions;

(b) 12 forces answered over two-thirds of the questions;

(c) eight forces answered over one-third of the questions;

(d) ten forces answered fewer than one-third of the questions;

(e) 11 forces did not provide answers to any questions; and

(f) one force (Port of Dover Police) stated that it was not a public body and therefore not subject to the FOIA 2000.⁹



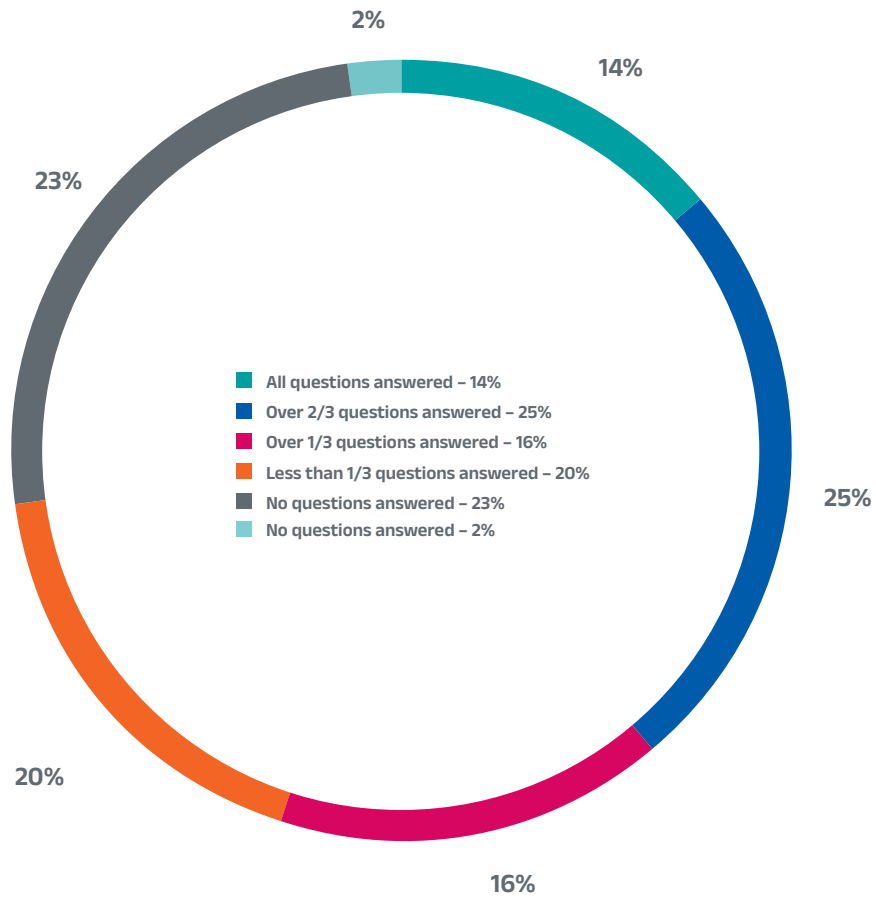
07_British Transport Police, Durham Constabulary, South Yorkshire Police and Wiltshire Police.

08_22 questions were asked in the initial FOI request but three of these (in the ancillary sections) were only relevant in the event that forces could not answer the prior questions.

As such, the above calculations are based upon the 19 questions in sections 1-4 of the request. The ancillary questions have also been excluded for the Alternate Initial Request, with calculations based upon the 15 substantive questions.

09_We did not challenge this position but have included the force in our list of 49 forces contacted and in the breakdown of responses throughout this report.

Figure 1: Response of police forces to initial FOI requests



REFUSALS

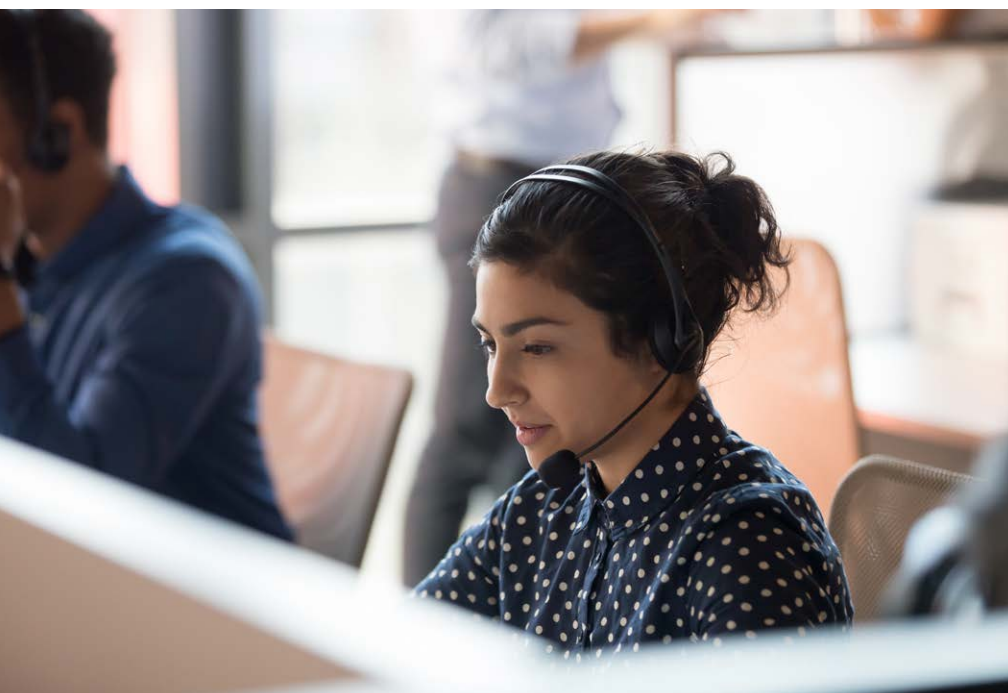
- 2.6 11 police forces initially did not answer the FOI request and issued refusal notices (a **Refusal Notice**). The most common reason cited by the police forces for not being able to provide the requested information was section 12 of the FOIA 2000. Section 12 provides that a public authority is not required to comply with a request for information where it estimates that the cost of complying with such request would exceed the appropriate limit (as set by the Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004 (**FOI Regulation**)). According to FOI Regulation 4(3), the cost of determining whether the relevant authority holds the requested information, as well as for locating, retrieving and/or extracting the relevant information, may be taken into account by it when estimating the cost of compliance with an FOI request. The FOI Regulation sets the appropriate cost limit for police authorities at £450 or 18 staff hours charged at a standard national rate of £25 per hour of work.
- 2.7 It appears that the time required to respond was increased in many cases because police forces used databases and systems that did not allow the extraction of qualitative information easily (whether that be because qualitative information cannot be retrieved automatically or because the information was split across various sources), which would mean that the relevant authorities would need to manually review each individual record to extract the requested information. For example, certain police forces specified that the training provided on “vulnerability” classifications was spread across multiple academic and practical application training processes, which would be difficult for the relevant authorities to review in depth. In addition, interpretation services may have been provided for a wider range of individuals than just victims of crime, so it would not be straightforward to isolate the services provided to those individuals.
- 2.8 Where police forces relied upon section 12 of the FOIA 2000 as the reason for not complying with an FOI request, they either requested that the FOI request be refined further to enable them to respond or they provided answers to such questions as they could answer without exceeding the appropriate cost limit.
- 2.9 In certain cases, the respondents stated that, while the recording criteria for police forces is set nationally, each authority uses its own systems to capture such information (including making policy decisions on the amount and scope of recording retrievable information), which would make the information provided unfit for comparative purposes.
- 2.10 Another reason given for police forces being unable to provide the requested information was that they had not recorded such information. The definition of “information” in section 84 of the FOIA 2000 specifies that reference to information in the FOIA 2000 is to information that is “recorded in any form”. This means that where police forces had not recorded information relating to language assessments and/or the training given to their workforce, they were not required to generate new information or explanations that were not already in recorded form. For example, certain police forces did not record whether a victim of crime had English as their second language, or did not speak English at all, as a mandatory field on their record management system. Such information may have been captured substantively in other recorded documents or in the body of reports, but then retrieving such information would be cost-barred under section 12 of the FOIA 2000. Separately, certain police forces also declined to provide answers where these were deemed by them to amount to “opinions” on the merits or demerits of their actions or explanations on policy and implementation, rather than purely the provision of existing information. Section 84 of the FOIA 2000 defines information as “information recorded in any form” and so these forces argued that the obligation under the FOIA 2000 did not extend to providing explanations/opinions of information unless these answers were themselves already recorded.
- 2.11 In certain instances, police forces also relied on section 21(1) of the FOIA 2000 to state that the relevant information was reasonably accessible to the applicant by other means. This provision was primarily relied on by authorities in respect of the question regarding the number of police officers employed by the relevant authority between 1 January 2020 and 1 January 2021. Please note that where police forces referred to publicly available sources in their responses, information from these sources is not included in this report.

REFINED REQUESTS

- 2.12 Refined requests were sent to 22 forces which had failed to answer all or certain questions – nearly half of all forces that were approached. The refined requests addressed the specific reasons given by each force for not responding to the entirety of, or to particular questions in, the initial request and contained requisitions revised on this basis.
- 2.13 Of the 22 forces that received refined requests, 12 responded in part to the refined questions while ten either answered “no” to the refined questions or did not respond at all.
- 2.14 Both initial and refined responses were reviewed to better understand the approach taken by police forces nationwide with respect to victims of crime with communication barriers. The findings are detailed in the remainder of this report.

COMMENTARY

- 2.15 The requests in this section sought data from police forces between 1 January 2020 and 1 January 2021. It is acknowledged that resources for police forces would have been significantly stretched during this period.
- 2.16 Nonetheless, the manner in which victims of crime are able to access vital emergency services is a matter of significant public interest and it is hoped that the members of the respective forces recognise this responsibility. It is notable that, across the 49 forces which received requests, only seven answered all of the questions asked and one declined to provide any response on the basis that it was not a public body.





POL

3. CLASSIFICATION OF VICTIMS WITH COMMUNICATION BARRIERS AS VULNERABLE

CASE STUDY

Mr A

Mr A is an Afghan man who recently came to the UK with his family. His teenage son was the victim of a stabbing which left him seriously injured. As a result, his son will not return to school or leave the house.

The matter was investigated by the police. However, the family has had no follow-up contact from the police and there has been no referral to Victims Support. The police appear to have dismissed the incident as “gang related” when there is no evidence that the young man is involved in any gangs.

3.1 This section of the FOI request focused on whether victims with communication barriers were classified as vulnerable. In the context of the Victims Code, vulnerability relates not only to a victim's additional support needs but also to the Enhanced Rights to which the Code entitles them and, in some cases, to Special Measures to help them during trial.

To be classified as vulnerable, therefore, has far-reaching implications for the victim. In this section of the FOI Request, police forces were asked whether they classified victims with limited or no English speaking, reading and/or writing skills or other communication barriers as vulnerable under the Vulnerability Assessment Framework (the VAF).¹⁰

INITIAL REQUESTS

- 1.1 Do you classify victims with limited or no English speaking, reading and/or writing skills and other communication barriers as “vulnerable” under the Vulnerability Assessment Framework?
- 1.2 If not, has your police force assessed whether having limited or no English skills is a form of vulnerability?
 - (a) If so, what form did that assessment take and what was its outcome; or (b) if not, why not?

¹⁰The VAF is a tool designed to identify vulnerability in all circumstances where the police have contact with victims, suspects and witnesses.

- 3.2 Approximately one third of the forces approached did not count a victim's limited or no English as a vulnerability. Among those that did consider it at least a potential vulnerability, there was a variety of approaches in place for assessing this. Of the 49 police forces that were asked this question:¹¹
- (a) Seven police forces confirmed that they do classify victims with limited or no English language skills as vulnerable under the VAF.
 - (b) 17 police forces acknowledged the VAF definition¹² and were broadly aligned with the notion that a language barrier could make a victim vulnerable, although they stated that they did not automatically qualify an individual under this definition.
 - (c) 20 police forces said individuals were assessed on a case-by-case basis. The Police Service of Northern Ireland response explained further that, if police officers in the force decide that someone is vulnerable, they have various resources available to them, including 24/7 access to a translation service and 24/7 access to the Registered Intermediary Scheme, which provides professional support in assessing a person's communication difficulties that can continue through to any court proceedings.
 - (d) Two police forces described how they use the THRIVE model to assess vulnerability and described how if a communication barrier renders someone "unable to take care or protect themselves" the force would classify that individual as vulnerable.¹³
 - (e) Three of the police forces also referred to PACE Code C (Revised) as another document they used in relation to the assessment of vulnerable adults.¹⁴
 - (f) Ten of the responses explained that the process of classifying a victim as vulnerable was, to a certain extent, based on individual officers' impressions.
 - (i) Dyfed-Powys Police, for example, noted that the classification is "subjective to each circumstance" and not everyone facing a communication barrier would be classified as vulnerable.
 - (ii) Warwickshire Police likewise explained that not everyone is automatically classed as vulnerable, even if there is a barrier to communication.
 - (iii) Similarly, Lancashire Constabulary commented that if an officer "feels that a victim meets the VAF vulnerability definition for any reason they will be classed as vulnerable" and this could "include any language barrier".
 - (g) 15 police forces said that they generally do not classify victims with limited or no English speaking skills as "vulnerable" under the VAF.
 - (i) Five of these respondents said that a language barrier would not make a victim automatically vulnerable under the VAF definition of vulnerability.
 - (ii) One (the Civil Nuclear Constabulary) stated that it did not have a VAF in place.
 - (iii) Although 15 police forces stated they generally do not classify victims with limited or no English speaking skills as "vulnerable", Essex Police noted that, when a crime is recorded in its system, a police officer could record on the form that the individual is "non-English speaking" and there is a free text box to add further information on the form. Cambridgeshire Constabulary also noted that its crime recording systems have the capability to record "Reason Vulnerable – non-English Speaking", but that this is not a mandatory field. It noted that a search of all crime records created in 2020 found that 78 victims did not have English as a first language recorded, but that very few records had this field completed.
 - (h) Separately, five of the police forces also referred to their translation services and materials, which they believed would negate vulnerability in relation to language issues.
 - (i) Three police forces did not directly respond to the question, but referred to various internal policy documents which suggest that they may classify individuals with language barriers as vulnerable on a case-by-case basis.

¹¹ The numbers below do not add up to 49 as there is overlap between the answers provided by forces – i.e. a force may answer that it does classify victims as vulnerable (paragraph 3.2(a)) and explain that it does so using the THRIVE model (paragraph 3.2(d)).

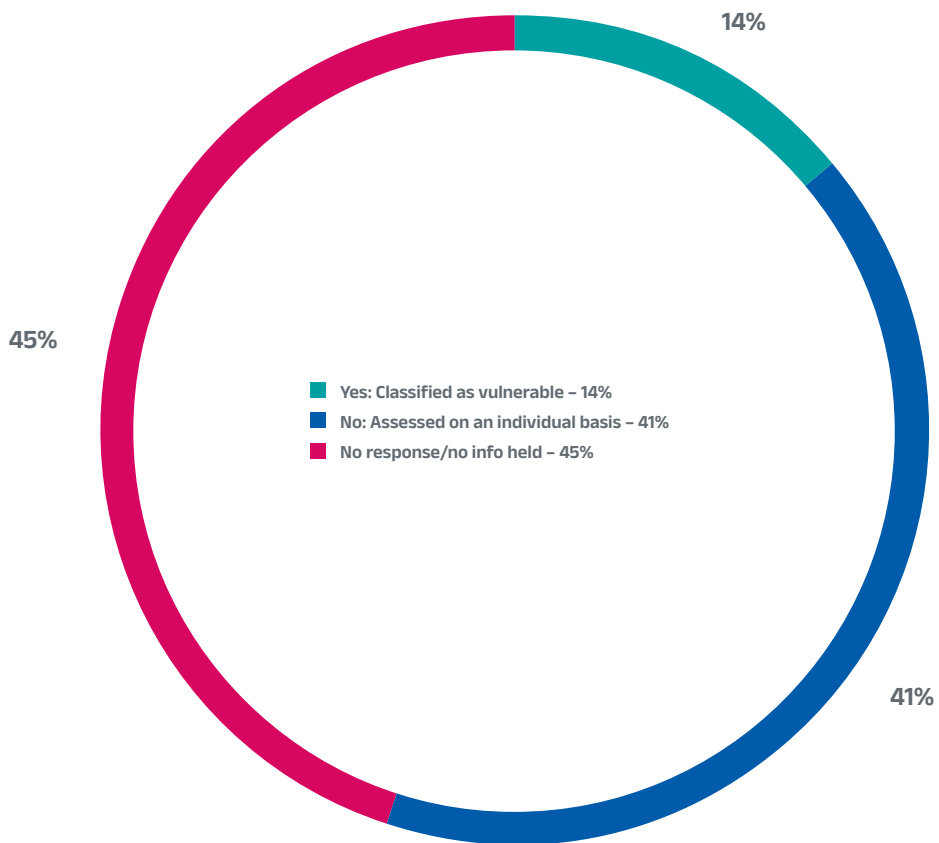
¹² The VAF definition of vulnerability relies on an individual being 'unable to take care of themselves' or 'protect themselves or others from harm'.

¹³ See: <https://foi.west-midlands.police.uk/wp-content/uploads/2021/01/THRIVE.pdf> and <https://www.college.police.uk/guidance/vulnerability-related-risks/introduction-vulnerability-related-risk>

¹⁴ <https://www.gov.uk/government/publications/pace-code-c-2019>



Figure 2: Are victims with limited or no English speaking, reading and/or writing skills classified as “vulnerable” under the Vulnerability Assessment Framework?





- 3.3 The Metropolitan Police shared a “Quick Guide Tool” that included an ABCDE tool, with C representing “communication capacity”. This tool guide included examples of “questions to ask yourself at the point of classification” for police officers. One example question stated, “do they understand your questions?”. Other examples in the Metropolitan Police tool guide focus on physical indicators (such as slurring). The other document provided by the Metropolitan Police was its “Vulnerability and Protection of Adults at Risk” policy. This policy notes that some adults may require communication aids or need to communicate through an intermediary. The policy directs users to the TP-Criminal Justice Intermediaries and a separate policy – “Achieving Best Evidence in Criminal Proceedings”.¹⁵ In addition, although the policy document points officers towards communication specialist intermediaries, these appear to be used or recommended for potential interviews or court proceedings, rather than when classifying an individual as a victim in relation to the VAF definition.
- 3.4 Other policy documents shared by other police forces also referred to the ABCDE tool and wider strategies included being able to communicate and engage effectively.
- 3.5 12 police forces did not provide a response on the basis that, referring to section 12 of the FOIA 2000, the costs involved in retrieving the information requested would exceed the appropriate limit.
- (a) Alongside this refusal, Suffolk Constabulary noted that language is not covered in its vulnerability strategy, although the force would provide assistance to someone for whom English is not their first language by requesting an interpreter. It stated that issues around communication barriers are addressed in its professional development courses. However, it noted that it does not have a searchable field within its internal systems for recording when a victim’s second language is English or whether a victim has communication barriers and trying to review all the records would take too long.
 - (b) Other police forces did not provide further explanation other than referring to section 12 of the FOIA 2000.
 - (c) Seven of the respondents noted that they did not hold the requested information. For example, City of London Police simply stated “no information held”; whereas other forces more generally responded that the information requested could not be retrieved and cited section 12 of the FOIA 2000 in conjunction with their response.
- 3.6 Two of the police forces recognised that the classification of vulnerability in relation to language was an area that required more attention. One of the police forces responded that there is no formal assessment around English language skills and recognised that “Access to Services” is a priority area for its “Operational Inclusion Delivery Board”.

¹⁵ <https://www.gov.uk/guidance/ministry-of-justice-witness-intermediary-scheme>

RECOMMENDATIONS

This section probed whether individual forces classified those who do not speak English as vulnerable for that reason. There was no uniform approach to this issue across forces and it appears that different forces have different ways of assessing and recording vulnerability. The reason for these different approaches will likely be complex and associated with any given force's structure and resources. As such, this report does not seek to impose wholesale change upon the issue of identifying vulnerability, a characteristic with myriad root causes.

However, the responses to the requests show that, at the time of responding, few forces had clear mechanisms in place to ascertain whether a potential victim struggled to communicate effectively in English. This hampers our, and no doubt the individual force's, assessment of whether the risks associated with such difficulties are effectively mitigated.

Better recording of the fact of a possible communication barrier is likely to lead to both greater consideration of the impact of such a barrier at the level of the individual case and a better data set to understand the extent to which such barriers affect the quality of justice victims receive at every stage in the criminal process. Such recording should not be onerous or unnecessarily restrictive on the ability of individual officers to respond flexibly to the needs of any given case. Therefore, care is needed to ensure that the right questions are asked at the right point, balancing the need to identify potential communication barriers with any risks of isolating victims, undermining victims' confidence in the police response or providing misleading ammunition to undermine the credibility of a complainant's account.

We have identified three simple, objective and purposefully broad questions below that may encourage officers to consider the language needs of a complainant in an individual case and begin to identify a data set from which further examination as to the impact of language barriers on access to justice could follow. **The issue as to whether any "barrier" exists is purposefully avoided.** Instead, officers can record whether English is a first language or not whilst being given the opportunity to record, where appropriate, that a complainant is fluent in English or that their command of English is such that it does not materially affect their ability to communicate.

- (a) Ask complainants whether English is their first language.
- (b) Provide space on the page for officers to enter any comments they consider relevant (such as English is very good / English is good enough for initial complaint but may need an interpreter later).
- (c) Identify, at the close of the case, whether an interpreter or any other measures to assist communication were employed at any point during the course of the case.



4. TRAINING

CASE STUDY

Language proficiency is of fundamental importance across settings that are meant to support victims of crime.

Ms R

Ms R is originally from Bangladesh and does not speak English. Ms R was a domestic abuse survivor who had experienced considerable physical abuse and controlling and coercive behaviour.

Ms R was referred to the Law Centre as her current accommodation at a mixed rough sleepers' shelter was extremely unsuitable. Ms R presented at the Law Centre with a friend to interpret. Ms R had not been adequately supported by the Local Authority which had failed to comply with its duties under: (a) its own Domestic Abuse strategy to provide "support in safe accommodation"; (b) the Domestic Abuse Act 2021 to properly assess Ms R's housing needs in light of her experience of domestic abuse; and (c) Section 188 of the Housing Act to provide Ms R with suitable accommodation. The Law Centre requested urgent action to provide Ms R with suitable accommodation.

The Law Centre also prompted Adult Services to conduct an urgent Care Act assessment on Ms R. The outcome of the assessment found that Ms R did have needs eligible for assistance under the Care Act. The Local Authority responded to the Law Centre's approach to say that it had tried to offer Ms R alternative, suitable accommodation but had not been able to reach her. Ms R contacted her housing officer urgently and was subsequently moved into a self-contained flat on the same day.

- 4.1 This section of the FOI request focused on the training provided to police officers when interacting with victims and witnesses with communication barriers. These questions sought to ascertain:
- (a) how many officers were employed by each police force between 1 January 2020 and 1 January 2021 and if these officers were required to attend training courses on interacting with victims with communication barriers;
 - (b) the scope, duration, contents and mode of relevant mandatory training courses attended by police officers; and
 - (c) monitoring procedures in place to confirm attendance and understanding of relevant mandatory training courses.



INITIAL REQUEST

2.1 How many police officers were employed by your force between 1 January 2020 to 1 January 2021? This includes police officers of all ranks from frontline to management, including on duty and off duty officers.

4.2 Of the 49 police forces that were asked this question:

(a) 21 did not respond; and

(b) of the 28 police forces which responded:

(i) 19 police forces¹⁶ provided a total or a range to indicate the total number of police officers employed during that year;

(ii) seven police forces¹⁷ stated that the requested information is publicly available;¹⁸ and

(iii) two police forces¹⁹ stated that no information was held on the subject.

4.3 Of those 19 forces that provided a numerical response, the number of police officers employed during 2020 by each force exhibited considerable range, from 90 to 13,775 officers. The total was 56,716 police officers.

4.4 As regards public information, as of 31 March 2022, there were 164,017 full-time equivalent (FTE) police officers in the United Kingdom.²⁰

INITIAL REQUESTS

2.2 Please identify what (if any) mandatory training courses the aforementioned police officers employed between 2020-2021 were required to attend on the issue of victims and witnesses with communication barriers. If no such mandatory training courses are in place, why not?

2.3 Please specify the contents of the mandatory training courses on the issue of victims and witnesses with communication barriers.

¹⁶ City of London Police, Civil Nuclear Constabulary, Cleveland Police, Cumbria Police, Devon and Cornwall [Constabulary], Dyfed-Powys Police, Gwent Police, Leicestershire Police, Lancashire Police, Ministry of Defence Police, North Yorkshire Police, Northamptonshire Police, Northumbria Police, Police Service of Northern Ireland, Staffordshire Police, Surrey Police, Warwickshire Police, West Mercia Police and West Midlands Police.

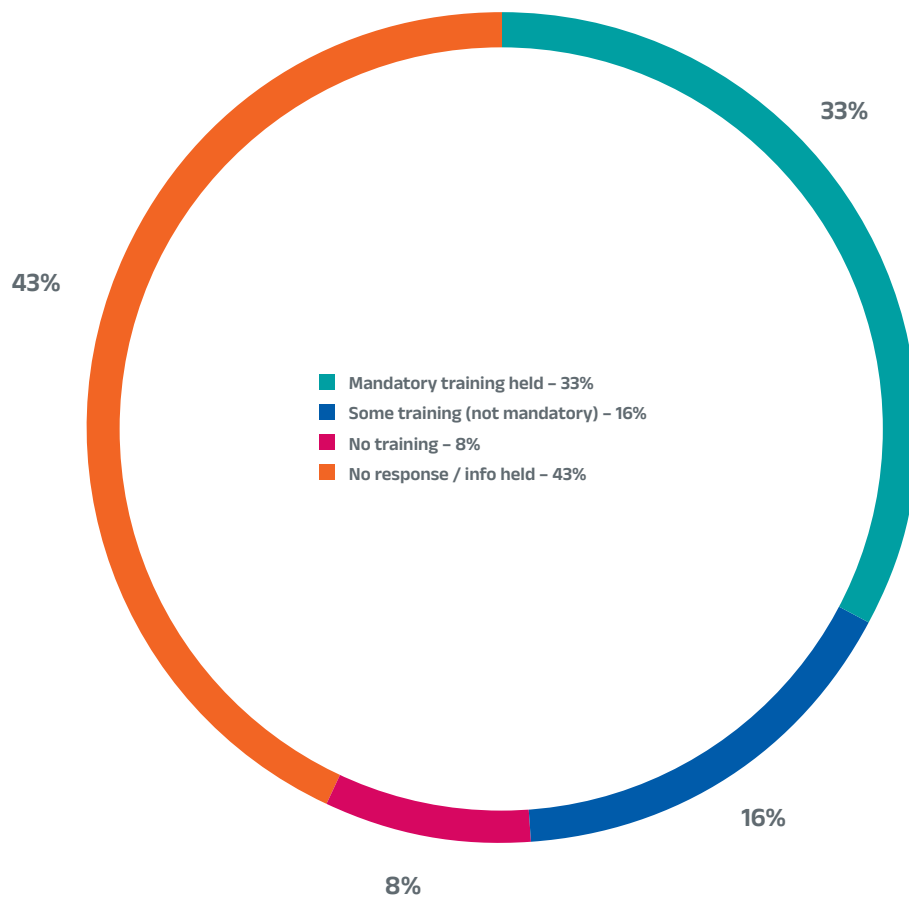
¹⁷ Bedfordshire Police, Cambridgeshire Constabulary, Hertfordshire Constabulary, Lancashire Constabulary, North Wales Police, Nottinghamshire Police and Thames Valley Police.

¹⁸ <https://www.gov.uk/government/statistics/police-workforce-open-data-tables>

¹⁹ British Transport Police and Nottinghamshire Police.

²⁰ <https://commonslibrary.parliament.uk/research-briefings/sn00634/>

Figure 3: Responses to question regarding whether police officers are required to attend training courses on interacting with victims and witnesses with communication barriers



4.5 Of the 49 police forces that were asked this question, 28 responded. Of those:

- (a) 16 police forces²¹ in total confirmed that their staff undertook such mandatory training.

Of these 16, eight forces²² stated that the initial training undertaken by all new police officers included sections on interacting with victims and witnesses with communication barriers. The courses highlighted were:

- (i) the Policing Education Qualifications Framework (PEQF);²³
- (ii) the Police Constable Degree Apprenticeship (PCDA);
- (iii) PEACE model interviewing;²⁴ and
- (iv) training on the Victims Code.

Notably, the PEQF curriculum has a targeted focus on matters concerning victims and witnesses with communication barriers. The PEACE interviewing training module includes training on the effective utilisation of intermediaries and translators when dealing with vulnerable victims and witnesses and includes practical insights into translator engagement. In addition, police forces stated that the Detective Pathway programme, a course undertaken by officers wishing to be promoted to detective, includes specialist focus on training and interviewing witnesses and victims with communication barriers, including children. However, this course is only mandatory for those officers training to become detectives and therefore is not undertaken by all police officers.

Furthermore, there were four police forces²⁵ which expressed that they held manual training on the requested topic in addition to the initial and promotional training listed above. From the information provided, these courses focused on vulnerability generally, rather than communication barriers specifically. However, Lincolnshire Police had a one-day course on “Vulnerability and Risk” and Dyfed-Powys Police’s training appeared to address a wide range of vulnerable individuals, including those with dementia and mental health issues;

- (b) eight forces²⁶ responded that no information was held on whether this type of mandatory training took place; and

- (c) four forces²⁷ detailed that they held no mandatory training on victims of crime with communication barriers.

4.6 Over half of the answers highlighted that the initial mandatory training for all officers centred on understanding vulnerability in a victim or witness and the methods they should use when approaching this issue. These courses included understanding communication with children or vulnerable adults. It was noted by the Bedfordshire Police force that the Detective Pathway programme provided more extensive and in-depth training than that of the PEQF on dealing with vulnerable witnesses and children, including multiple day courses. It was noted that the programme goes into depth on how to assess a witness’s capabilities, the role of intermediaries in assisting with communication difficulties, the communication needs of children and dealing with adults with severe learning difficulties.

4.7 Very few specific details about the content of courses were provided. An exception to this was Dyfed-Powys Police: its mental health and dementia awareness lessons (as mentioned in paragraph 4.5(a) above) focus specifically on how to communicate with such individuals. Further, Lincolnshire Police runs three courses on Autism Awareness, Use of Interpreters/Big Words and Special Measures in Court, all of which contain details about communicating through barriers. Only Staffordshire Police appeared to include details of techniques to be used where communication barriers exist, such as rapport building.

21. Bedfordshire Police, British Transport Police, Cambridgeshire Constabulary, Cleveland Police, Dyfed-Powys Police, Civil Nuclear Constabulary, Essex Police, Gwent Police, Lancashire Police, Lincolnshire Police, North Wales Police, North Yorkshire Police, Northumbria Police, Police Service of Northern Ireland, Warwickshire Police and Wiltshire Police.

22. Bedfordshire Police, British Transport Police, Cambridgeshire Constabulary, Cleveland Police, Essex Police, North Wales Police, North Yorkshire Police and Northumbria Police.

23. PEQF is a professional training framework for police officers and staff: <https://www.college.police.uk/career-learning/policing-education-qualifications-framework-peqf>

24. <https://www.college.police.uk/app/investigation/investigative-interviewing/investigative-interviewing>

25. Lincolnshire Police, Dyfed-Powys Police, Civil Nuclear Constabulary and Gwent Police.

26. City of London Police, Cumbria Constabulary, Leicestershire Police, Northamptonshire Police, Nottinghamshire Police, Staffordshire Police, Surrey Police and North Yorkshire Police.

27. Hertfordshire Police, West Mercia Police, West Midlands Police and Ministry of Defence Police.

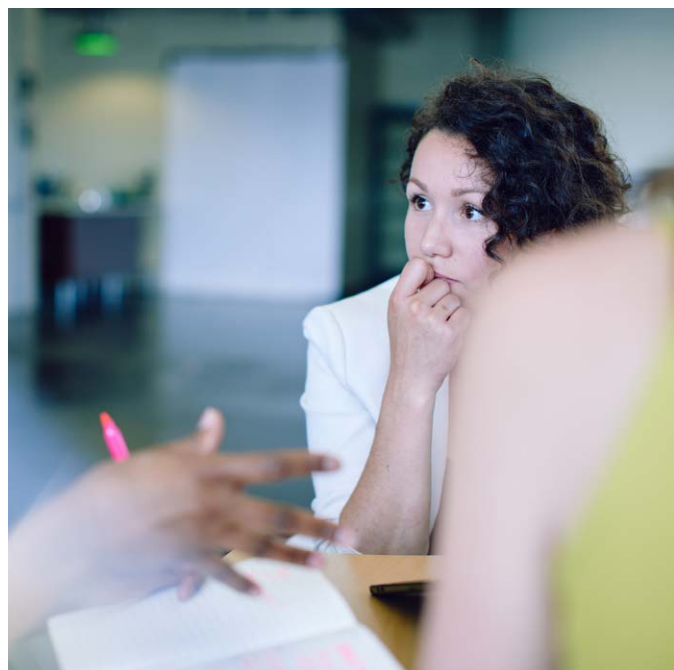
INITIAL REQUEST

2.4 Please confirm whether the mandatory training courses include:

- (a) the legal definition of the term “vulnerable”;
- (b) communication barrier indicators such as a lack of English language or disabilities;
- (c) the duty of police officers to identify victims’/witnesses’ communication barriers;
- (d) the duty of police officers to take reasonable steps to ensure that the vulnerable victims and witnesses with communication barriers receive the same service as those without such vulnerabilities, such as securing an interpreter (foreign language/sign language);
- (e) the duty of police officers to take reasonable steps to ensure that the Victims Code is applied in the same way to victims with communication barriers (this includes the right to receive updates, the right to provide a statement and the right to seek a review of a decision to take no further action);
- (f) the mechanisms in place in your police force to assist vulnerable witnesses and victims with communication barriers to give evidence in support of an investigation (such as providing guidance on Achieving Best Evidence (ABE) interviews, special measures at court etc.); and
- (g) the duty of police officers to assess victims for Victim Support Services and to make such referrals where deemed suitable.

4.8 12 police forces in total responded to this question, with only three of these providing any additional detail (beyond yes or no responses):

- (a) Each of these three police forces²⁸ confirmed that the mandatory training provided to its police officers covered each of the subjects listed in points (a) to (g) of this question.
- (b) Two police forces²⁹ confirmed that the subjects listed in points (a) to (g) were generally included in the PEQF, the Detective Pathway, the PEACE interviewing and the Supporting Victims and Witnesses training courses.
- (c) One police force³⁰ listed the specific courses that cover the subjects listed in points (a) to (g) of this question, including: PCDA; Adults at Risk and Victims Code of Practice lessons; PEACE witness training; VCOP and Special Measures; and PEQF.



28_Bedfordshire Police, Cleveland Police and Lincolnshire Police.

29_Bedfordshire Police and Lincolnshire Police.

30_Cleveland Police.

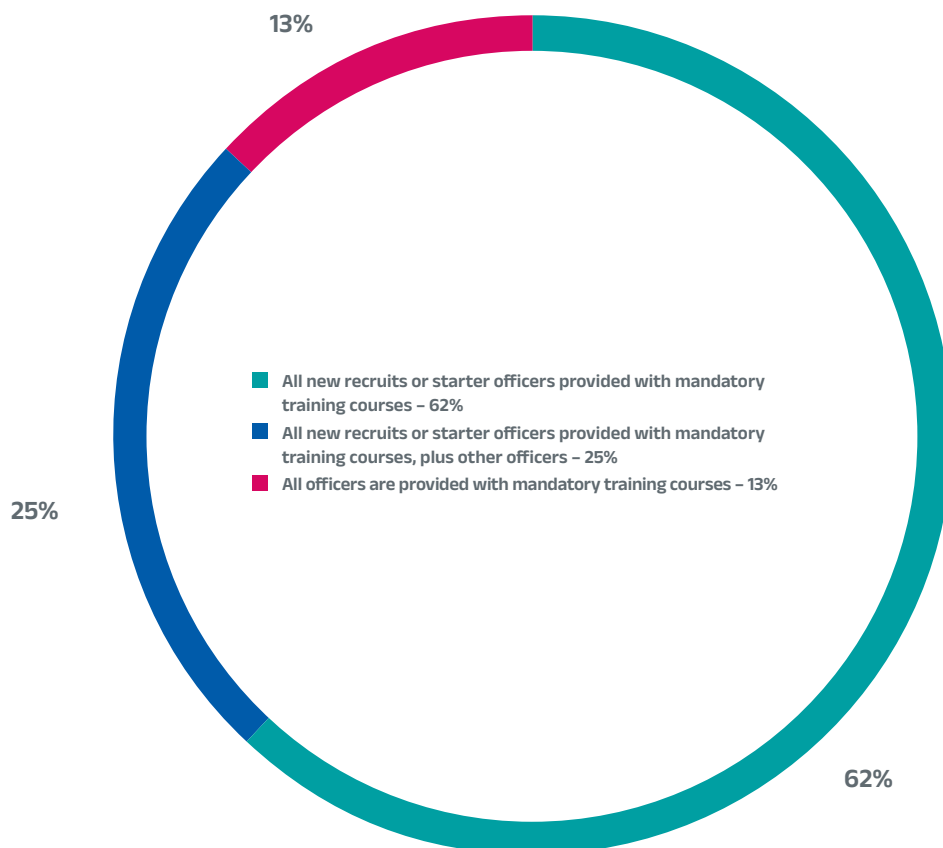
INITIAL REQUEST

2.5 Please confirm how many police officers employed by your force (see question 2.1 above) attended and studied the mandatory training courses between 1 January 2020 and 1 January 2021.

4.9 Of the 49 forces that were asked this question, 25 forces did not answer.

4.10 Of the 24 forces that provided a response to this question, eight confirmed that officers are provided with mandatory training courses and, within this category, their responses can be categorised as follows.

Figure 4: Breakdown of forces which provided officers with mandatory training courses



Some of the forces provided the numbers of officers that attended the mandatory courses (which has been set out below). We have assumed that, for the purposes of this question, the mandatory training pertains to that which is relevant for this project (given the prior questions of the FOI Request). However, some police forces did not specifically note this point in their responses.

- 4.11 We have also assumed that where no information was provided by a force, or where the response provided by the force was unclear as to whether training was mandatory or not, this means that no mandatory training was provided.
- 4.12 Of the eight forces that confirmed that officers are provided with mandatory training courses:
- (a) Five said that all new recruits or starter officers are provided with mandatory training. Of these:
 - (i) three did not indicate the type or nature of the training (of these, one indicated that 34 student officers attended the mandatory training,³¹ one indicated that 220 student officers joined between the relevant dates³² and one did not specify numbers);³³
 - (ii) one indicated that all new recruits attend PEQF training but did not specify numbers (though it did specify that the Detective Pathway programme is not mandatory);³⁴ and
 - (iii) one³⁵ indicated that 438 student police constables took a mandatory Initial Police Learning and Development Programme (IPLDP).³⁶
 - (b) Two indicated that all new recruits or starter officers are provided with mandatory training, in addition to other officers. Of these:
 - (i) one indicated that 346 new recruits started as a PCDA, Degree Holder Entry Programme (DHEP) or Police Now recruit, in addition to 214 probationary officers who continued with the PCDA and Police Now courses having been recruited in previous years;³⁷ and
 - (ii) one indicated that all new recruits completed the PEACE interview package, in addition to 336 operational officers that completed the Victims Code Learning Package in 2020.³⁸
 - (c) One indicated that all officers attended and studied mandatory training courses (without specifying the nature, type or number of officers attending the course).³⁹
- 4.13 Of the other 16 forces that responded, but which do not provide mandatory training courses:
- (a) three provided a number only (one indicated 162,⁴⁰ one indicated 114⁴¹ and another answered that 108 officers were in initial training⁴²), and for each it is unclear which type of training this relates to or whether the training was mandatory;
 - (b) two said that officers attended a variety of different courses,^{43 44} though it is unclear whether the training was mandatory;⁴⁵
 - (c) one said that 57 officers attended an IPLDP course and that 54 officers attended an IPL course, though it is unclear whether the training was mandatory;⁴⁶
 - (d) one said that 260 delegates attended a one-day Vulnerability and Risk course between 1 January 2020 and 1 January 2021, though it is unclear which type of training this relates to or whether the training was mandatory;⁴⁷
 - (e) one said that there were 83 PEQF students, though it is unclear whether the training was mandatory;⁴⁸
 - (f) one said, "all who successfully completed [Initial Foundation Courses (IFCs)] within the specified period", without specifying what type of training was provided, the number of officers that attended or whether such training was mandatory;⁴⁹
 - (g) five said that training was not mandatory or provided an answer of "N/A" (which has been interpreted as meaning that training was not mandatory);⁵⁰
 - (h) one said that no information was held in respect of this question;⁵¹ and
 - (i) one answered with publicly available information.⁵²
- 4.14 The answers provided to this question indicate that most forces (notwithstanding those that did not respond) provide at least some training to their officers, although not always on a mandatory basis.

31_Cleveland Police.

32_Nottinghamshire Police.

33_Cambridgeshire Constabulary.

34_Bedfordshire Police.

35_Essex Police.

36_ <https://www.joiningthepolice.co.uk/application-process/ways-in-to-policing/traditional-entry-ipldp>

37_Northumbria Police.

38_Warwickshire Police.

39_Staffordshire Police.

40_North Yorkshire Police.

41_North Wales Police.

42_Gwent Police.

43_The response from the Police Service of Northern Ireland was:

"PIP2 Witness Course (aimed at new-to-role detectives) – Total = 98, Police Only ABE Skills

Development Course – Total = 12, Child Joint Protocol Pre-Interview Assessment

(PIA) Course – Total = 21, Child Joint Protocol ABE Video Recorded Interview Course – Total = 17".

44_The response from Durham Constabulary indicated that officers attended training such as "Investigative Skills Training" and "New Recruits Training". Durham Constabulary also indicated that 74 attended an Initial Police Learning & Development course in the period and that 26 attended the new Police Constable Degree apprenticeship training. The force also indicated that it utilised a "mandatory Victims code e-learning package (College Learn)".

45_Police Service of Northern Ireland and Durham Constabulary.

46_Wiltshire Police.

47_Lincolnshire Constabulary.

48_Dyfed-Powys Police.

49_Civil Nuclear Constabulary.

50_Devon and Cornwall Constabulary, Hertfordshire Constabulary, Ministry of Defence Police, Northamptonshire Police and Surrey Police.

51_West Midlands Police.

52_Cheshire Constabulary.

INITIAL REQUEST

2.6 Please confirm the duration and mode (i.e. lecture/e-learning) of the mandatory courses.

4.15 Of the 49 forces that were asked this question, 24 forces did not answer. This was either by way of a Refusal Notice or by failing to provide an answer to this specific question despite responding to the FOI request.

4.16 Of the 24 forces that provided a response to this question, the responses can be categorised as follows:

- (a) Some of the forces provided a high level of detail on the mode of the courses and the duration. Others provided only one set of, or no, details.
- (b) Of the eight forces that said officers are provided with mandatory training courses:
 - (i) two indicated that the mandatory course took the form of a PEQF qualification, which is a 22-week "initial training phase" that is provided through face-to-face, digital and self-directed learning;⁵³
 - (ii) one indicated that the mandatory course consisted of a PEQF qualification, in addition to a range of other courses such as PCDA (three years), DHEP (two years), Professionalising Investigations Programme (two to four weeks), Specialist Child Abuse Investigation Course (eight days), Specialist Sexual Assault Investigators Development Programme (one week), Senior Investigating Officer (four weeks) and Management of Serious Crime Investigations Development Programme (two weeks);⁵⁴

(iii) four indicated that at least some face-to-face training was provided. Of these:

(A) one indicated that training consisted of a 24-week training programme delivered face to face, along with mandatory e-learning packages;⁵⁵

(B) one indicated that the mandatory IPLDP lasted 19 weeks, using a variety of different learning techniques, including face-to-face learning;⁵⁶ and

(C) two indicated that their training courses were shorter in length – one provided a three-hour face-to-face session with an additional 40 minutes of college learning⁵⁷ – the other consisted of witness interview courses lasting two weeks and a vulnerability course lasting two days, each of which were face to face; and⁵⁸

(iv) one answer was unclear as to the form of mandatory training, stating that no information was held for student officer training but that the duration of the Victims Code learning package was 40 minutes (the mode of the Victims Code learning package was not given).

⁵³ Bedfordshire Police and Cambridgeshire Constabulary.

⁵⁴ Northumbria Police.

⁵⁵ Cleveland Police.

⁵⁶ Essex Police.

⁵⁷ Nottinghamshire Police.

⁵⁸ Staffordshire Police.

4.17 Of the 15 forces that responded but did not confirm whether officers are provided with mandatory training courses:

- (a) eight indicated that non-mandatory training was provided with at least some face-to-face contact. Of these:
 - (i) two said officers attended a variety of different face-to-face courses,^{59, 60} although they did not provide exact course lengths;⁶¹
 - (ii) four said that officers attended a variety of different face-to-face courses that lasted, in total, for a number of days (although the courses varied in length);⁶² and
 - (iii) two said that officers attended face-to-face training courses but did not quantify the length of these training courses;⁶³
- (b) five stated that training was not mandatory or provided an answer of "N/A";⁶⁴
- (c) one said that no information was held in respect of this question;⁶⁵ and
- (d) one answered with publicly available information.⁶⁶

4.18 Answers provided to this question suggest that forces providing officers with mandatory training appear to be generally face to face. The topics include vulnerability and lack of English language skills and appear to be provided by a formal body (such as the PEQF). Of the forces that responded but did not confirm whether officers were provided with mandatory training courses, the training was generally shorter in length or less relevant to the subject of this report.



59_ See Footnote 13.

60_ See Footnote 14.

61_ Police Service of Northern Ireland and Durham Constabulary.

62_ Dyfed-Powys Police, Gwent Police, Lincolnshire Police and North Wales Police.

63_ Civil Nuclear Constabulary and Wiltshire Police.

64_ Devon and Cornwall Constabulary, Hertfordshire Constabulary, Ministry of Defence Police, Northamptonshire Police and Surrey Police.

65_ West Midlands Police.

66_ Cheshire Constabulary.

INITIAL REQUEST

2.7 Please confirm whether the police officers were required to attend Continuing Professional Development sessions on vulnerable witnesses with communication barriers, or whether the mandatory courses were limited to one session only.

4.19 Of the 49 forces that were asked this question, 25 did not answer. This was either by way of a Refusal Notice or by failing to provide an answer to this specific question despite responding to the FOI request.

4.20 Of the forces which provide officers with mandatory training courses, none of the responses clearly indicated that officers are required to attend compulsory Continuing Professional Development training (CPD) sessions (as set out below). Of the forces which did not provide officers with mandatory training courses, there were mixed responses, but some did provide ongoing CPD courses (and one indicated that such a CPD course was compulsory).

4.21 Of the eight forces which said that officers are provided with mandatory training courses:

(a) four said there were no ongoing CPD sessions apart from the core mandatory training programme. Of these:

(i) two indicated that CPD was not part of the PEQF programme, but that further higher level learning related to victim care is delivered as part of the year-two and year-three delivery plans for new recruits;⁶⁷

(ii) one indicated that there were no CPD sessions, but that the mandatory courses are not limited to one session, but threaded throughout 24 weeks;⁶⁸ and

(iii) one indicated that there were no CPD sessions and instead student officers would discuss such issues throughout their training insofar as they arise;⁶⁹ and

(b) four forces did not provide a clear answer as to whether ongoing CPD sessions were compulsory or not. Of these:

(i) one indicated that any CPD beyond the initial training period would depend on personal circumstances, but would generally not go beyond the initial mandatory training period;⁷⁰

(ii) one indicated that some officers were required to maintain CPD to allow them to continue to practise in particular departments and although it was not specifically in relation to vulnerable witnesses it was likely to be included;⁷¹

(iii) one indicated that CPD sessions would be delivered to all existing staff as new material is produced, usually from the College of Policing;⁷² and

(iv) one indicated that CPD is limited to one session.⁷³



67_Bedfordshire Police and Cambridgeshire Constabulary.

68_Cleveland Police.

69_Warwickshire Police.

70_Essex Police.

71_Northumbria Police.

72_Staffordshire Police.

73_Nottinghamshire Police.

4.22 Of the 16 forces that responded but did not confirm whether officers are provided with mandatory training courses:

- (a) one indicated that CPD was required in relation to officers that work with vulnerable witnesses, though not related to any underlying skills development course, which included: (i) a three-day Achieving Best Evidence (ABE) skills development course; and (ii) a three-day child and adult joint protocol ABE skills development course;⁷⁴
- (b) four forces provided variable time frames, indicating that: (i) CPD forms part of refreshers;⁷⁵ (ii) there is constant assessment;⁷⁶ (iii) CPD sessions are arranged several times a year;⁷⁷ or (iv) CPD provision is unknown;⁷⁸
- (c) one force did not provide any CPD;⁷⁹
- (d) one force's response did not include any mention of CPD;⁸⁰
- (e) five responded that training was not mandatory or provided an answer of "N/A";⁸¹
- (f) three said that no information was held in respect of this question;⁸² and
- (g) one answered with publicly available information.⁸³

4.23 The answers provided to this question indicate that **forces providing officers with mandatory training do not always provide officers with CPD after the mandatory training takes place.**

However, four forces did indicate that at least some follow-up training takes place for officers, although it is unclear whether this is mandatory.⁸⁴ Of the forces that do not provide officers with mandatory training, at least one did appear to require some officers to keep up to date with CPD where they work in a relevant role.⁸⁵ Four additional forces also indicated that CPD sessions would be provided, but this was not necessarily compulsory.⁸⁶



74_Police Service of Northern Ireland.

75_Civil Nuclear Constabulary.

76_Gwent Police.

77_North Wales Police.

78_Dyfed-Powys Police.

79_Lincolnshire Police.

80_Durham Constabulary.

81_Devon and Cornwall Constabulary, Hertfordshire Constabulary, Ministry of Defence Police, Northamptonshire Police and Surrey Police.

82_West Midlands Police, North Yorkshire Police and City of London Police.

83_Cheshire Constabulary.

84_Essex Police, Northumbria Police, Staffordshire Police and Nottinghamshire Police.

85_Police Service of Northern Ireland.

86_Civil Nuclear Constabulary, Gwent Police, North Wales Police and Dyfed-Powys Police.

INITIAL REQUEST

2.8 Please confirm how police officers' attendance and study of the mandatory course were monitored.

4.24 Of the 49 forces that were asked this question, 25 did not answer. This was either by way of a Refusal Notice or by failing to provide an answer to this specific question despite responding to the FOI request.

4.25 Of the eight forces which provided officers with mandatory training courses, all kept a monitor of officers' attendance. This was less clear for non-mandatory training courses.

4.26 Of those forces which provided mandatory training:

- (a) five indicated that monitoring was overseen by external organisations, such as a university⁸⁷ or a Force Coordination Centre;⁸⁸
- (b) two indicated that attendance was recorded internally within the force;⁸⁹ and
- (c) one force responded that officers' attendance would be monitored locally within Command and Control systems and students would have been subject to regular "knowledge checks" carried out by training staff, along with being subject to the annual and interim professional development review system.⁹⁰

4.27 Of the 16 forces that responded but did not confirm whether officers are provided with mandatory training courses:

- (a) four responded that their training sessions are monitored using internal systems (such as through a training system or on an electronic training record);⁹¹
- (b) two forces provided unclear answers, one indicated that all officers were required to attend all sessions and one indicated that there was no exam specific to the non-mandatory training;⁹²
- (c) five answered that training was not mandatory or provided an answer of "N/A" (which has been interpreted as meaning that training was not mandatory);³
- (d) four answered that no information was held in respect of this question;⁹⁴ and
- (e) one answered with publicly available information.⁹⁵

4.28 The answers provided to this question indicate that forces providing officers with mandatory training monitor attendance, the majority involving external organisations in such monitoring. Of the forces that do not provide officers with mandatory training, attendance monitoring at training sessions did not appear to always occur.

⁸⁷ Bedfordshire Police, Cambridgeshire Constabulary, Staffordshire Police and Warwickshire Police.

⁸⁸ Northumbria Police.

⁸⁹ Cleveland Police and Nottinghamshire Police.

⁹⁰ Essex Police.

⁹¹ Civil Nuclear Constabulary, Dyfed-Powys Police, North Wales Police and Police Service of Northern Ireland.

⁹² Gwent Police and Lincolnshire Police.

⁹³ Devon and Cornwall Constabulary, Hertfordshire Constabulary, Ministry of Defence Police, Northamptonshire Police and Surrey Police.

⁹⁴ North Yorkshire Police, West Midlands Police, City of London Police and Durham Constabulary.

⁹⁵ Cheshire Constabulary.

INITIAL REQUEST

2.9 Please confirm how the police officers' understanding and competence in this course was examined.

4.29 Of the 49 forces that were asked this question, just over half (25 forces) did not answer. This was either by way of a Refusal Notice or by failing to provide an answer to this specific question despite responding to the FOI request.

4.30 Of the eight forces that responded confirming that officers are provided with mandatory training courses:

(a) five indicated that officers were assessed through a mixed form of assessment. Of these:

(i) two answered that the assessment was underpinned by an assessment framework consisting of practical assessment, qualitative essay completion and multiple-choice question examinations;⁹⁶

(ii) one answered that the mandatory training was assessed using continuous assessment in class and through end-of-module examinations;⁹⁷

(iii) one answered that officers were required to sit a number of formal examinations and complete various practical assessments to demonstrate that their knowledge and understanding was to an "operationally competent" level;⁹⁸ and

(iv) one answered that officers were required to complete a six-month work-based development portfolio, along with practical assessments, case studies and group tasks;⁹⁹

(b) one force answered that the mandatory course was assessed through observation, role play and questioning;¹⁰⁰ and

(c) two forces did not provide clear answers as to how the mandatory course was assessed, one answering that the course was assessed through "formative assessment"¹⁰¹ and one answering that responsibility for assessment was with the university administering the course.¹⁰²

4.31 Of the 16 forces which responded but did not confirm whether officers are provided with mandatory training courses:

(a) three forces indicated that officers were assessed through a mixed form of assessment. Of these:

(i) one force responded that their training sessions are assessed through summative and formative assessment;¹⁰³

(ii) one force responded that their training sessions are assessed through examinations set by the local university administering the course;¹⁰⁴ and

(iii) one force responded that their training sessions are assessed through written and practical examinations, group work and questions posed in class;¹⁰⁵

(b) one force answered that practical interview scenarios are conducted which test students' understanding, in addition to the completion of a portfolio demonstrating competence;¹⁰⁶

(c) one force confirmed that the training course was not examined;¹⁰⁷

(d) one force provided an unclear answer, indicating that the course was assessed through "regular and ongoing formative assessment";¹⁰⁸

(e) five forces answered that training was not mandatory or provided an answer of "N/A" (which has been interpreted as meaning that training was not mandatory);¹⁰⁹

(f) four forces answered that no information was held in respect of this question;¹¹⁰ and

(g) one force answered with publicly available information.¹¹¹

4.32 The answers provided to this question indicate that forces providing officers with mandatory training generally assess the courses through thorough mixed assessment, including using practical, qualitative and work-based assessments. Where training is not mandatory, the assessment appears less clear.

96_Bedfordshire Police and Cambridgeshire Constabulary.
97_Cleveland Police.
98_Essex Police.
99_Northumbria Police.
100_Staffordshire Police.
101_Nottinghamshire Police.
102_Warwickshire Police.
103_Civil Nuclear Constabulary.
104_Dyfed-Powys Police.
105_Gwent Police.
106_North Wales Police.

107_Lincolnshire Police.
108_Police Service of Northern Ireland.
109_Devon and Cornwall Constabulary, Hertfordshire Constabulary, Ministry of Defence Police, Northamptonshire Police and Surrey Police.
110_North Yorkshire Police, West Midlands Police, City of London Police and Durham Constabulary.
111_Cheshire Constabulary.

INITIAL REQUEST

2.10 If police officers were examined on this course, please confirm how many police officers successfully passed it. If police officers were not examined on this course – why not?

4.33 Of the 49 forces that were asked this question, just over half (25 forces) did not answer. This was either by way of a Refusal Notice or by failing to provide an answer to this specific question despite responding to the FOI request.

4.34 Of the eight forces which responded confirming that officers are provided with mandatory training courses:

- (a) two answered that all officers passed the assessment;¹¹²
- (b) one answered that the vast majority of officers passed the assessment – with 423 of the 438 students successfully completing the mandatory IPLDP;¹¹³ and
- (c) five did not address how many officers passed the assessment. Of these:
 - (i) one answered “not applicable” given that officers were working towards completion of their assessment and would not be assessed until 2023;¹¹⁴
 - (ii) one answered that assessment was “ongoing through work-based assessment” but failed to specify how many officers successfully completed the work-based assessment;¹¹⁵
 - (iii) one answered that assessments are summative and that development areas are addressed until the student tries again and “gets [the assessment] right” which is further assessed in the workplace – adding that “officers who cannot demonstrate competence become subject to development plans”;¹¹⁶
 - (iv) one referenced “as above” despite not providing an answer to the question;¹¹⁷ and
 - (v) one noted that results were monitored by the university assessing the course.¹¹⁸

4.35 Of the 16 forces that responded but did not confirm whether officers are provided with mandatory training courses:

- (a) two answered that all officers passed the assessment;¹¹⁹
- (b) four provided unclear answers such as:
 - (i) only indicating how many officers attended the course;¹²⁰
 - (ii) noting that all officers had to pass as a requirement to move onto the next stage of their assessment, without specifying how many officers passed;¹²¹
 - (iii) one indicated that 114 officers successfully passed, without specifying the number of officers that undertook the assessment;¹²² and
 - (iv) one answered “no” as officers were assessed through formative assessment, without specifying how many officers passed the formative assessment;¹²³
- (c) one confirmed that the training course was not examined;¹²⁴
- (d) five answered that training was not mandatory or provided an answer of “N/A”;¹²⁵
- (e) three answered that no information was held in respect of this question;¹²⁶ and
- (f) one answered with publicly available information.¹²⁷

4.36 The answers to this question, for both mandatory and non-mandatory training, were not entirely clear. This may reflect that forces were not generally aware of the numbers passing their course or did not monitor such a figure. Having said that, where forces did provide an answer to this question, most officers were indicated to have passed the assessment.

¹¹² Bedfordshire Police and Cambridgeshire Constabulary.

¹¹³ Essex Police.

¹¹⁴ Northumbria Police.

¹¹⁵ Nottinghamshire Police.

¹¹⁶ Staffordshire Police.

¹¹⁷ Cleveland Police.

¹¹⁸ Warwickshire Police.

¹¹⁹ Civil Nuclear Constabulary and Dyfed-Powys Police.

¹²⁰ Durham Constabulary.

¹²¹ Gwent Police.

¹²² North Wales Police.

¹²³ Police Service of Northern Ireland.

¹²⁴ Lincolnshire Police.

¹²⁵ Devon and Cornwall Constabulary, Hertfordshire Constabulary, Ministry of Defence Police, Northamptonshire Police and Surrey Police.

¹²⁶ North Yorkshire Police, West Midlands Police and City of London Police.

¹²⁷ Cheshire Constabulary.



4.37 The answers to this question, for both mandatory and non-mandatory training, were not entirely clear. This may reflect that forces were not generally aware of the numbers passing their course or did not monitor such a figure. Having said that, where forces did provide an answer to this question, most officers were indicated to have passed the assessment.

RECOMMENDATIONS

From the responses received there appear to be various training courses in place by police forces. The noticeable distinction between police forces, however, seems to be in relation to the initial training provided to all new recruits and the more specialist training made available under the Detective Pathway Programme, which includes more specialist training for officers interviewing witnesses or victims with communication barriers and how to effectively work with translators and intermediaries in such cases.

From the data received, the police forces **appear to have differing requirements** as to which courses are optional or mandatory and how end-of-course assessments should be monitored. Granted, officers can acquire professional competence through a variety of training pathways. However, where a force already allows officers to assess language needs in subjective, impression-led or discretionary ways, as noted above, **this can increase the risk of inconsistencies** and of overlooking victims' needs.

There is a need for interactive and practical training sessions for officers, helping to identify language and communication barriers.

This training should be compulsory for all officers and/or incentivised through the awarding of CPD points for participation, covering identical or at least similar topics. The content, training methodology and number of hours of each course should be identical or at least similar. There is a requirement for procedures and systems to record course content and attendance and to ensure full participation.

The assessment of successful completion of the training should be based on similar methods. It should be possible to fail and there should be opportunities to retake the test, until a reasonable standard and a pass are achieved. There is a need for regular refresher courses.

All forces should recognise the need to be able to provide accurate responses to legitimate questions around this training.

5. ENGAGEMENT WITH VULNERABLE VICTIMS OF CRIME

CASE STUDY

Ms E

Ms E is a young vulnerable woman who speaks very little English and has poor mental health. She had been placed in a house of multiple occupation (HMO) by the Local Authority. She was referred to Harrow Law Centre because she had been evicted from the HMO. She had threatened her neighbour with a knife. As a result, she had been arrested and the Local Authority discharged its duty to her as it considered her intentionally homeless. She was awaiting a decision by the Crown Prosecution Service as to whether she would be charged and face criminal proceedings. She had no friends or family and with little money was at risk of being street homeless.

Harrow Law Centre interviewed the woman initially with the assistance of a member of staff who speaks Russian. Harrow Law Centre discovered that Ms E had been harassed by her neighbour for many months and had made a complaint to the police of a sexual assault. But nothing had been done about this. When Ms E felt threatened once again, she made a threat to kill the neighbour with a knife. As a result, the managing agent of the property evicted Ms E. However, the managing agent had previously been alerted by Ms E to the harassment she was receiving from her neighbour but the agent failed to take any action. Instead, Ms E was pressured by way of threats by the Managing Agent to break down the door to surrender her tenancy.

Harrow Law Centre represented the client and once the facts were established the Local Authority agreed to accommodate her and the CPS did not press charges. Harrow Law Centre did make a subject access request to the Metropolitan Police to see how Ms E's complaint had been dealt with. However, the police had no record of her complaint of sexual assault and harassment but only the later complaint against her.

- 5.1 This section of the FOI Request focused on police forces' engagement with victims with communication barriers. The questions aimed to establish:
- (a) how police forces track and count victims of crime who speak English as a second language and how many such victims were recorded by forces between January 2020 and January 2021;
 - (b) how police forces record and report the language and communication needs of victims with communication barriers at each point of contact; and
 - (c) how police forces communicate with such victims in accessible formats.





INITIAL REQUEST

3.1 Does the police force record the number of victims of crime with English as a second language? If yes, how many such victims were recorded between 1 January 2020 to 1 January 2021?

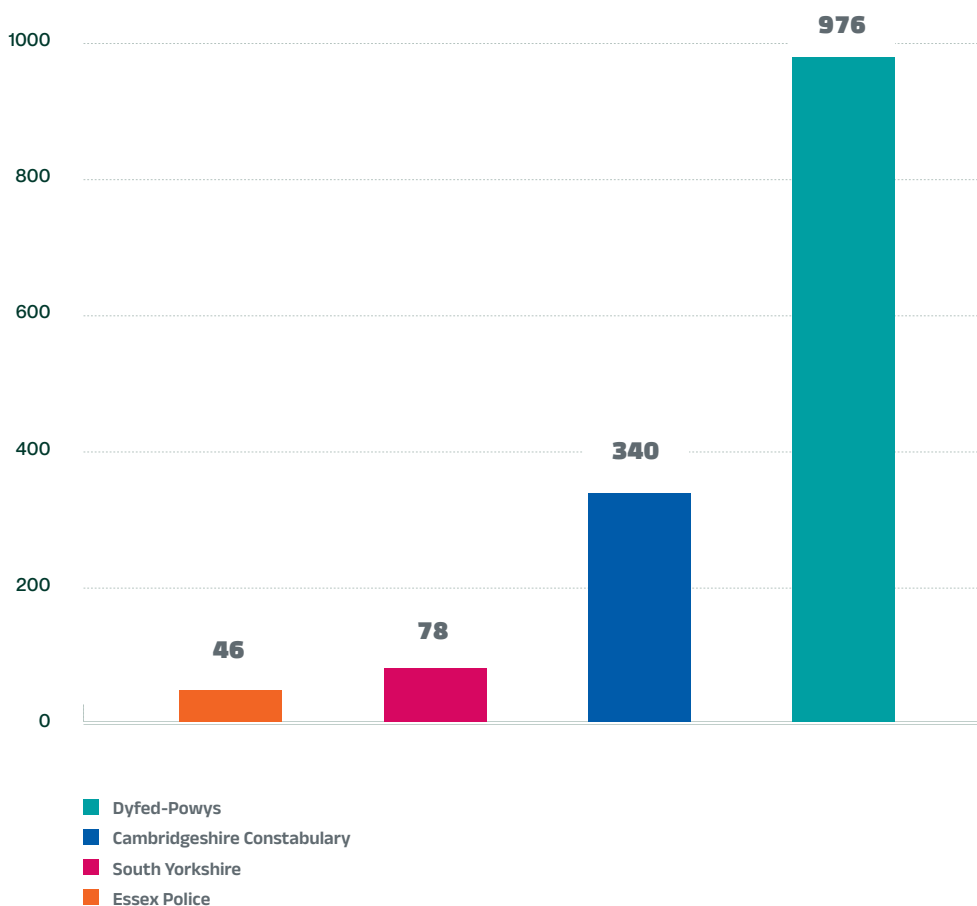
- 5.2 Of the 49 police forces which were asked this question, 29 provided at least some of the information requested and 20 forces did not provide any information in response.
- 5.3 Many forces explained that they do not record whether a victim's second language is English in a centralised manner. Instead, where a victim of crime has English as a second language, it might only be included in the crime report in free text. However, in their responses, some forces took this to mean that they **did not** record this information, whereas others took this to mean that they **did** record this information (see figures at paragraph 5.5 below).
- 5.4 While some forces said that they do not record whether a victim's second language is English, they do record whether a victim's primary language was not English or whether they were "non-English speaking". It appears from the responses that some forces saw this as sufficient reason to answer "yes" to the first part of the question, whereas others answered "no" on the basis that they did not specifically record whether the victim's second language was English. For this reason, forces that recorded the same characteristics might have responded differently to the first part of the question (see figures at paragraph 5.5 below).
- 5.5 Of the 14 police forces which responded "no" to this question:
- (a) four forces said that any such information would be held within free text fields on each crime report and every crime recorded against an individual would need to be manually read and reviewed to check if this has been recorded in every instance;¹²⁸
 - (b) five forces said that this information is not recorded at all;¹²⁹ and
 - (c) five forces said that they do not record whether a victim's second language is English, but explained other similar characteristics that they do record. However, these characteristics are often not mandatory fields and so are not always completed. These characteristics included:
 - (i) first language;¹³⁰
 - (ii) "non-English speaking";¹³¹
 - (iii) ethnicity;¹³²
 - (iv) spoken language, correspondence language and whether a translator is required;¹³³ and
 - (v) primary language only and an option for if the person requires a translator.¹³⁴

128_Metropolitan Police, Hampshire Police, Suffolk and Norfolk Constabularies, Kent Police.
129_West Mercia Police, Cleveland Police, Northumbria Police, Ministry of Defence Police, City of London Police.
130_Gwent Police.
131_Warwickshire Police.
132_Northamptonshire Police.
133_North Wales Police.
134_Nottinghamshire Police.

- 5.6 Of the six forces which responded “yes” to this question without providing figures:
- (a) two said that a victim's ability to speak and/or understand English can be recorded on the relevant crime recording system, however, it is not a mandatory field and there may be times when it is not recorded;¹³⁵
 - (b) two recorded first language only;¹³⁶ and
 - (c) two said that the information is held but is not in a readily retrievable format.¹³⁷

- 5.7 Of the forces which responded “yes” and provided figures for the period from 1 January 2020 to 1 January 2021, these figures were as follows:
- (a) 46;¹³⁸
 - (b) 78;¹³⁹
 - (c) 340;¹⁴⁰ and
 - (d) 976.¹⁴¹

Figure 5: Numbers of victims identified as vulnerable because their first language was not English in 2020/2021 (NB: Only four forces provided specific figures)



¹³⁵ North Yorkshire, West Midlands Police.
¹³⁶ Police Scotland, Metropolitan Police.
¹³⁷ Staffordshire Police, Lincolnshire Police.
¹³⁸ Dyfed-Powys Police.
¹³⁹ Cambridgeshire Constabulary.
¹⁴⁰ South Yorkshire Police.
¹⁴¹ Essex Police, noting that in 76.2% of cases this field was left blank.

5.8 One of these forces confirmed that recording these characteristics is not mandatory and that “very few records had this field completed”.¹⁴² The fact that recording was not mandatory was a common theme in the responses. Others did not provide further context as to whether recording of the victims as “non-English speaking” is a compulsory field.

5.9 One force interpreted “victim” to mean “the listed victim where an offence resulted in a prosecution”. They do not record if a victim has English as a second language but do record if the victim speaks a language other than English. The total number of such victims in 2020 was 14.¹⁴³

5.10 The answers to this question suggest that information on this topic is not easily available from the forces that collected it and therefore that the number of victims with English as a second language recorded between 1 January 2020 and 1 January 2021 may be higher than the figures show.



¹⁴² Cambridgeshire Constabulary.
¹⁴³ Police Service of Northern Ireland.

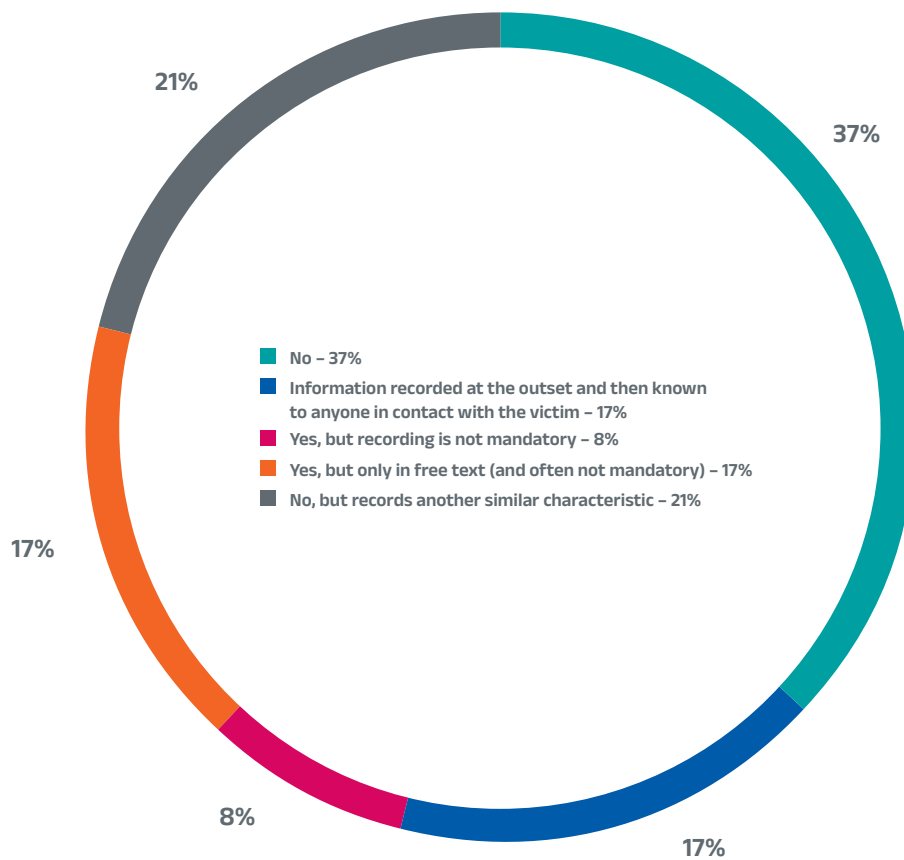
INITIAL REQUEST

3.2 Does the police force record the first and other languages of victims with communication barriers at every point of contact? If yes, please provide this data.

5.11 Of the 49 forces which were asked this question, about half (24 forces) provided at least some of the information requested.

5.12 No forces provided quantitative data on how frequently the language capabilities of victims with communication barriers are recorded by police. The responses given broadly fell into five categories.

Figure 6: Responses provided to question 3.2 (how frequently language capabilities of victims with communication barriers are recorded by police officers)

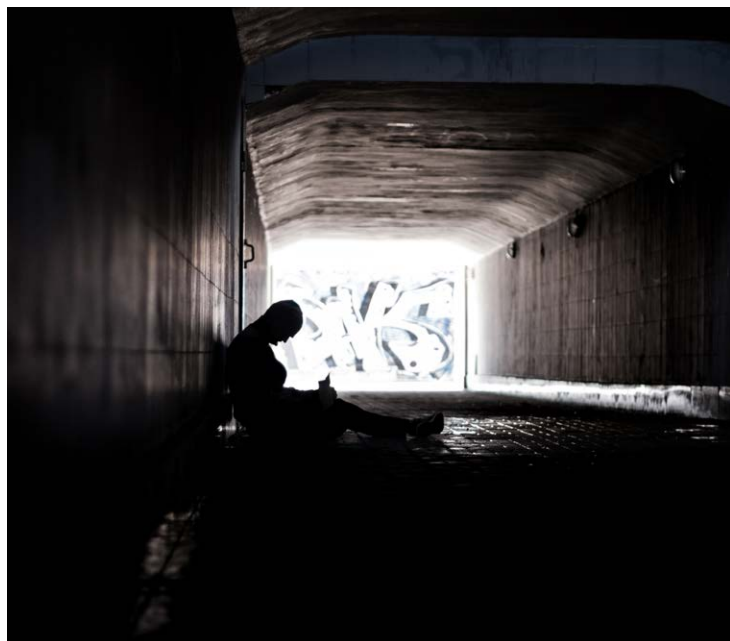


5.13 As shown in Figure 6 above:

- (a) the most common response was “no”, with nine forces saying they do not record this information.¹⁴⁴ For example, the Police Service of Northern Ireland stated that their system “does not request that the call maker at any stage advises what language they speak”;
- (b) five forces said they do not record the first and other languages of victims, but they record other characteristics, such as ethnicity, nationality or preferred method of communication;¹⁴⁵
- (c) four forces said they record the languages of victims, but only in free text fields that are not always mandatory or searchable;¹⁴⁶
- (d) four forces said they record the languages of victims at the outset and then make this information known to anyone in contact with the victim, without needing to record it again;¹⁴⁷ and
- (e) two forces said they record the languages of victims at every point of contact, but this is not a mandatory requirement.¹⁴⁸ North Yorkshire Police explained that “there may be occasions where it is not recorded” and that it “relies on the [victim] informing us of such information”.

5.14 As with question 3.1, even when forces have the capability to record a victim’s first language at each point of contact, this is often not a mandatory requirement. Even when recorded, the information is often not recorded in an easily retrievable format.

5.15 Of the forces which answered “yes” to this question, it often appears that **this information is not systematically recorded** at each point of contact. For example, the West Midlands Police explained that “once an incident progresses to being recorded as a crime there is the **capability** to record the first language and whether they speak English in the crime recording IT system. It does not though provide a structured way of recording any additional languages; however, that may be recorded in various ‘notes’ fields” (emphasis added).



144_Lancashire Constabulary, Police Service of Northern Ireland, Warwickshire Police, Lincolnshire Police, Staffordshire Police, Ministry of Defence Police, City of London Police, Cambridgeshire Constabulary and Hertfordshire Constabulary.

145_Cleveland Police, Nottinghamshire Police, Essex Police, Northamptonshire Police and North Wales Police.

146_Metropolitan Police, West Midlands Police, West Mercia Police and Northumbria Police.

147_Dyfed-Powys Police, Devon and Cornwall Constabulary, Gwent Police and Merseyside Police.

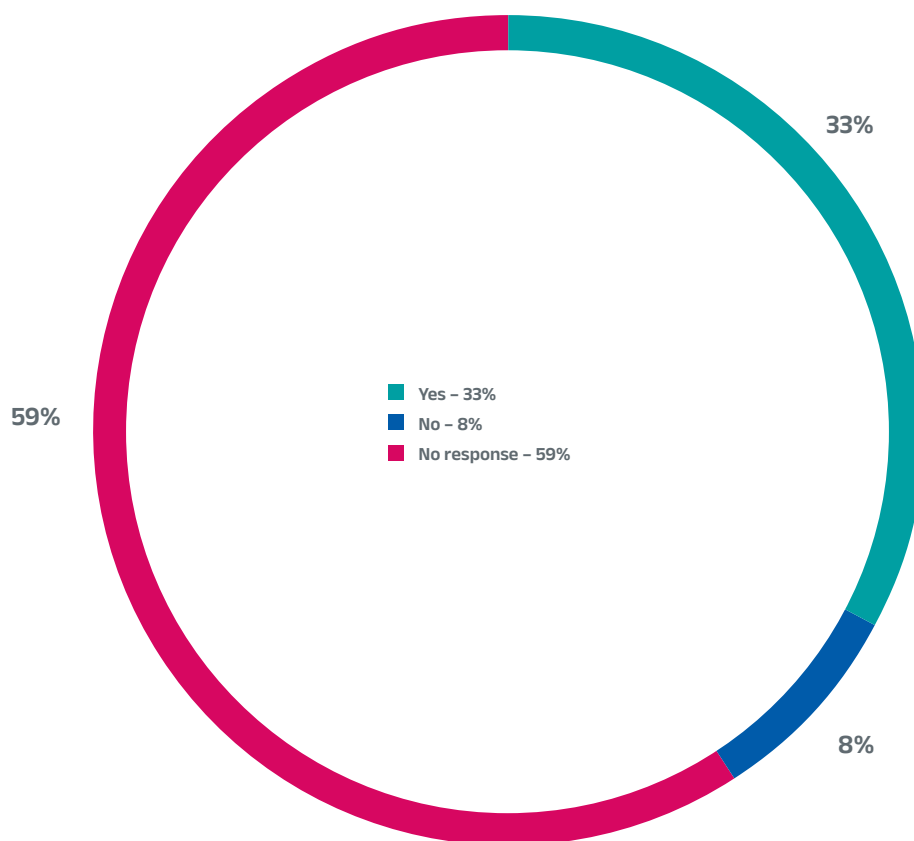
148_North Yorkshire and Bedfordshire Police.

INITIAL REQUEST

3.3 Please confirm whether written communications are provided to such victims in easy-to-read or pictorial formats.

5.16 Of the 49 forces which were asked this question, 20 provided at least some of the information requested.

Figure 7: Does the police force provide written communications in an easy-to-read format to victims with communication barriers?



5.17 As shown in Figure 7, the responses suggest a large number of forces provide written communications to victims with language barriers in easy-to-read or pictorial formats. However, although many forces responded “yes” to this question, further context was provided.

5.18 Of the 16 police forces which answered “yes” to this question:

(a) very little detail was given as to the **format** of the communications. Responses from forces such as Nottinghamshire Police, which stated that “language services are provided” without giving further detail or referring to easy-to-read or pictorial formats, suggested that not all victims with communication barriers are catered for; and

(b) the answers suggested that there are often **limits** as to the number of alternative formats that communications are available in and it might be that amended formats are only provided for specifically prepared communications.

For example:

(i) Dyfed-Powys Police noted that their victim information pack is available in English, Welsh and Polish, but did not refer to other communications with victims or what would be provided to victims who did not speak one of these three languages.

(ii) North Yorkshire Police provide supporting documents for victims of hate crimes in seven languages (including Arabic, Ukrainian, Russian, Pashto, Kurdish, Dari and Farsi), but did not state whether other communications are available in alternative languages or formats. West Midlands police explained that “a number of the leaflets [that] officers carry and hand out have alternative languages”, but that their website can only be made available in other languages through the victim’s use of their own translation services “such as Google Translate”. Northamptonshire Police said that “there are some documents translated” but did not give further detail.

(iii) Lancashire Constabulary explained that “all postal requisitions are now in easy to read pictorial formats”, but did not state whether communications to victims that are not provided by post are also provided in easy-to-read pictorial formats.

5.19 It is evident that the **provision of alternative formats is often not automatic** and that materials in alternative formats might not be immediately available. For example, the Police Service of Northern Ireland noted that officers and staff can request “easy [to] read format and braille” documents as and when required, in line with any other translation requirements. Durham Police said that they will “strive to accommodate the request” if forms are requested in different languages or communication styles.

5.20 The extent to which alternative formats are available may be limited. For example, Northumbria Police stated that “we follow the RNIB guidance and all printed documents should be posted/sent out in 12 font or more” but did not explain any further accommodations made to victims with communication barriers.

5.21 Two police forces did not give any further detail as to the nature and format of the communications provided.¹⁴⁹



¹⁴⁹ Cleveland Police and Gwent Police.

RECOMMENDATIONS

There does not seem to be a uniform approach across the police forces when it comes to centrally recording data in relation to victims with communication barriers. If this is being recorded as a free text option in the crime report, it makes it difficult to monitor if any free text cannot be searched and flagged up in the first instance for the investigating officer who will have contact with the victim.

Given the need for police forces to be able to respond to crime reports as quickly and effectively as possible, a **consistent approach** needs to be implemented across all police forces which flags the issue of victims with communication barriers at an **early stage** and in a way which brings this to the **attention** of any emergency response officers who have first contact with a victim/complainant, as well as the investigating officers.

This could be implemented by introducing a new entry field in the crime reports across all forces which records whether there are any language barriers. This could be kept broad, as follows:

(a) Language barriers: yes/no

(b) If yes, please provide further information:

In cases where the crime reports flag at the earliest stage that there is a language barrier, this should be raised right at the top of any crime report so that any officer dealing with the particular victim is aware straightaway of any language-related vulnerabilities and can ensure these are addressed from an early stage. Doing so means that police forces can **more easily build a relationship of trust and confidence with the victim from the outset** of their contact and ensure that the police have an accurate appraisal of the victim's circumstances, including an appreciation of any cultural nuances which may be central to the investigation. With this in mind, the inclusion of an addition entry in the crime report recording a victim's language barriers must be a mandatory field.

There should be **data** readily available across police forces recording the language capabilities of victims with communication barriers. Especially in cases where a victim may well speak a number of different languages to varying degrees, this may prove to be particularly useful when dealing with written as well as oral communication with a particular victim.

It is encouraging that a large number of forces provide **written communications** to victims in easy-to-read or pictorial formats. However, written communications must consistently be provided in a wide range of languages, in both easy-to-read and pictorial formats, with easy-to-access digital versions available across the police force websites, and with hard copies available for circulation at community centres and public access points.

Whilst the focus of this request has been in relation to written communications, it should be acknowledged that victims with language barriers will have varying **degrees of literacy** and regard should be given to providing multi-media communications to victims as a way of ensuring maximum inclusion.

6. INTERPRETATION AND TRANSLATION

CASE STUDY

Mr P

Mr P is Polish and has lived and worked in the UK for many years. He was made redundant and subsequently became street homeless. One evening he was viciously attacked and badly beaten. His attacker stamped on his head causing severe brain damage. A police officer discovered Mr P lying in the road and he was admitted to hospital. The incident was captured on CCTV and the police made an arrest. The police visited Mr P immediately after the attack and took his passport but they have not been in touch since. There was no reason to take his passport.

Mr P's sister contacted a Law Centre because the hospital wanted to charge Mr P for his treatment as he does not have EU settlement status. This was a significant amount. Mr P's sister previously tried numerous organisations for help unsuccessfully.

The Law Centre is helping by seeking to prevent the hospital trust from charging Mr P, assisting with securing Mr P's EU settlement, pursuing the police for details on the case, applying for criminal injuries compensation and helping to secure appropriate benefits and housing.

- 6.1 This section of the FOI request focused on interpretation and translation services or other tailored support available to victims of crime. We understand interpretation services to mean services dealing with spoken language in real time, whereas translation services focus on written content. The questions aimed to find out if police forces organised interpretation and translation services for victims who need them as well as the procedures and budget to do so. Along with requesting information regarding formalised, contractual provisions for such services, the request sought details of any voluntary language support available to police forces.
- 6.2 Most respondents organised interpretation and translation services for victims, usually through a language services provider (**LSP**) and sometimes (but not always) under the Police-Approved Interpreter and Translator (**PAIT**) scheme. The PAIT scheme is a classification system and national database for interpreters and translators carrying out police assignments across England and Wales that seeks to ensure consistency and reliability of interpretation and translation. Most respondents made financial provisions for interpretation and translation services, though not all had a specific budget for this purpose. Over half of respondents did not have a body of volunteers available to provide language support. Some police forces used officers or staff with language skills to provide translation/interpretation support.



INITIAL REQUEST

4.1 Does the police force organise “competent” and “accredited” interpreters for interviews and translation of key documents for victims with communication barriers? If yes, how many interpreters were organised for such victims between 1 January 2020 and 1 January 2021?

6.3 38 forces answered this question whilst 11 forces did not. Nine forces that did not answer the question had not answered any questions in the FOI request on the basis of an exemption,¹⁵⁰ one provided some information in the spirit of cooperation despite relying on an exemption, though not in relation to this question,¹⁵¹ and one said no information was held in respect of this question.¹⁵²

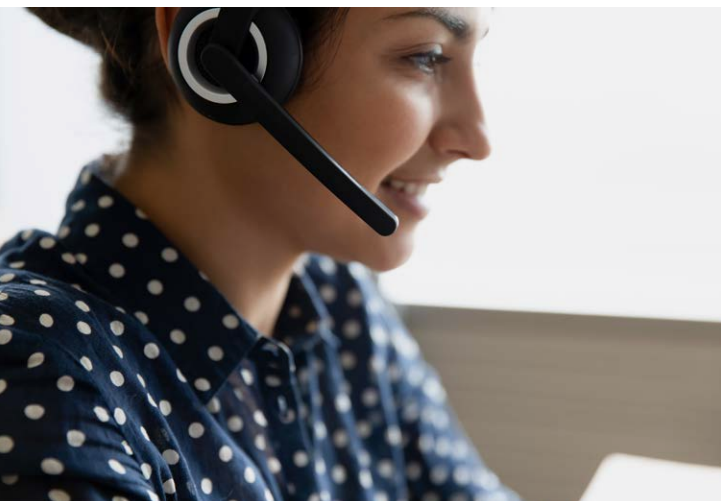
6.4 Of the 38 forces that answered the question:

(a) 14 forces said that they did organise “competent” and “accredited” interpreters for victims with communication barriers and provided some form of quantitative data,¹⁵³

(b) 12 forces said that they organised interpretation and translation services for victims but did not hold or could not retrieve information about the number of interpreters used,¹⁵⁴ and

(c) 12 forces said that they organised interpretation and translation services for victims but did not answer the numerical part of the question.¹⁵⁵

6.5 Nine of the police forces provided data on the number of times that a translator or interpreter was used in the review period.¹⁵⁶ However, these figures are not confined to victims of crime only.



¹⁵⁰ Derbyshire Constabulary, Dorset Police, Greater Manchester Police, Hampshire Constabulary, Humberside Police, Kent Police, Port of Dover Police, Sussex Police and West Yorkshire Police.

¹⁵¹ Nottinghamshire Police.

¹⁵² Ministry of Defence Police.

¹⁵³ Avon and Somerset Constabulary, British Transport Police, Cambridgeshire Constabulary, Cheshire Constabulary, Devon and Cornwall Constabulary, Essex Police, Lancashire Constabulary, Metropolitan Police Service, North Wales Police, North Yorkshire Police, Police Scotland, Police Service of Northern Ireland, Surrey Police and Wiltshire Police.

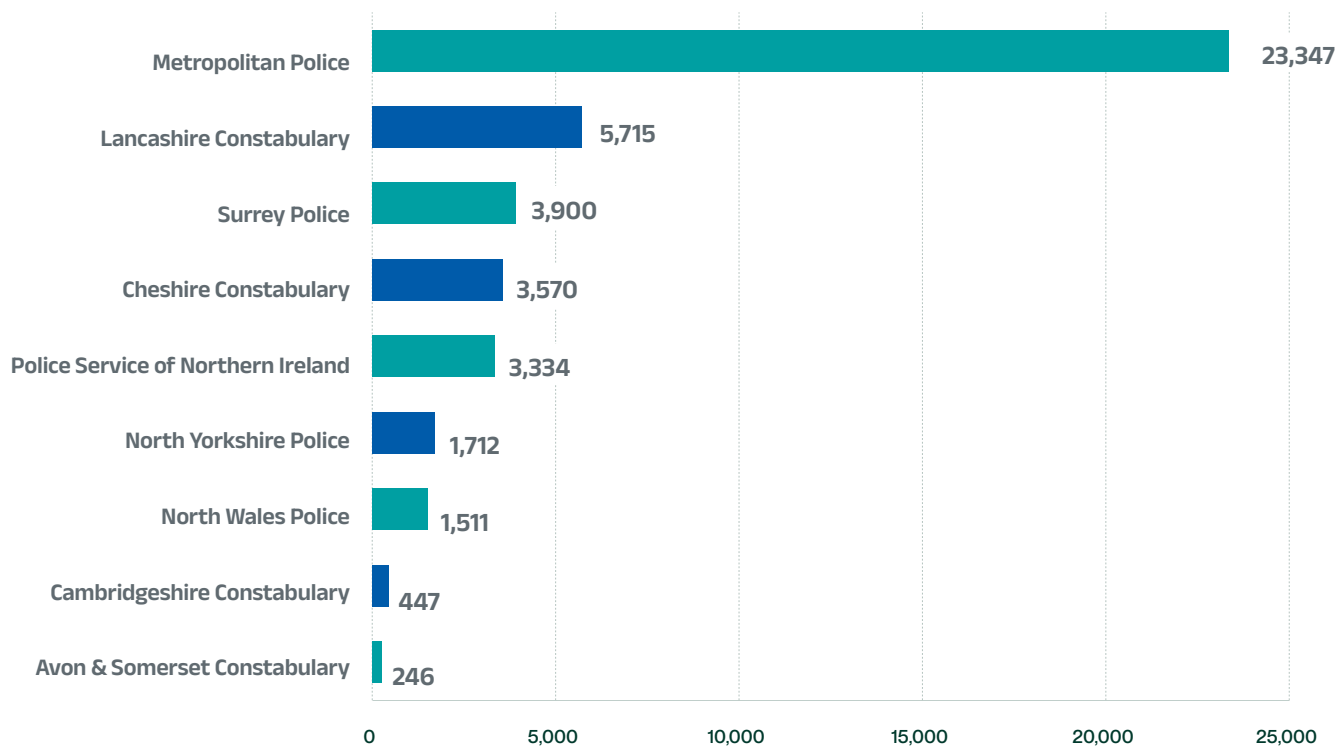
¹⁵⁴ City of London Police, Cleveland Police, Cumbria Constabulary, Durham Constabulary, Gloucestershire Constabulary, Hertfordshire Constabulary, Lincolnshire Police, Northamptonshire Police, Northumbria Police, Staffordshire Police, West Midlands Police and Merseyside Police.

¹⁵⁵ Bedfordshire Police, Civil Nuclear Constabulary, Dyfed-Powys Police, Gwent Police, Leicestershire Constabulary, Norfolk and Suffolk Constabularies, South Wales Police, South Yorkshire Police, Thames Valley Police and Warwickshire Police.

¹⁵⁶ Avon and Somerset Constabulary, Cambridgeshire Constabulary, North Wales Police, North Yorkshire Police, Police Service of Northern Ireland, Cheshire Constabulary, Surrey Police, Lancashire Constabulary and Metropolitan Police Service.



Figure 8: Use of an interpreter or translator in 2020/2021 (where forces provided figures)



2020/21: USES OF A TRANSLATOR/INTERPRETER

- 6.6 It is noted that the figure above and the responses extracted below do not take into account the relative population of each area and the diversity of that population, which is likely to be relevant to demand for interpretation and translation services.
- 6.7 The forces that responded to the question regarding the number of interpreters organised did not provide easily comparable data, with most responses not limited to the use of interpretation and translation services for victims of crime only. The data provided included the:
- (a) number of uses of an interpreter/translator;¹⁵⁷
 - (b) number of interpreters/translators used;¹⁵⁸ and
 - (c) total hours of interpretation/translation.¹⁵⁹
- 6.8 In the relevant period (of one year, overlapping with the early pandemic) and for victims of crime alone:
- (a) the Metropolitan Police Force used 354 individual interpreters on 5,995 occasions (comprising 82,000 hours of work), for a population of about 9 million people; and
 - (b) Essex Police used an interpreter on 312 occasions, for a population of over 1.8 million people.
- 6.9 In the relevant period and across all usages of interpretation and translation services:
- (a) Devon and Cornwall Constabulary, employing 3,600 officers to serve a population of 1.8 million people, used 42 individual suppliers of interpretation and translation services;
 - (b) Wiltshire Police used 120 individual suppliers of interpretation and translation services;
 - (c) Police Scotland, the UK's second largest force, serving nearly 5.5 million people, recorded 13,950 hours of interpretation services provided; and
 - (d) the British Transport Police recorded 3,377 hours of interpretation services provided.
- 6.10 Some forces do not appear to hold easily accessible data on the number of interpreters or number of instances of interpretation organised for victims, as 12 forces did not hold or could not extract this information.
- 6.11 It would appear that most respondent police forces do organise some form of interpretation and translation for victims, as no force expressly responded to say that they do not. However, of the forces that did respond, it is difficult to draw firm conclusions from the data provided.

INITIAL REQUEST

- 4.2 Please provide all procedures for officers and staff on how to access language assistance services under different circumstances, including when receiving and responding to requests for assistance, making enforcement stops, conducting field investigations and witness interviews, conducting custodial interrogations and performing other law enforcement operations.

¹⁵⁷ Ibid.

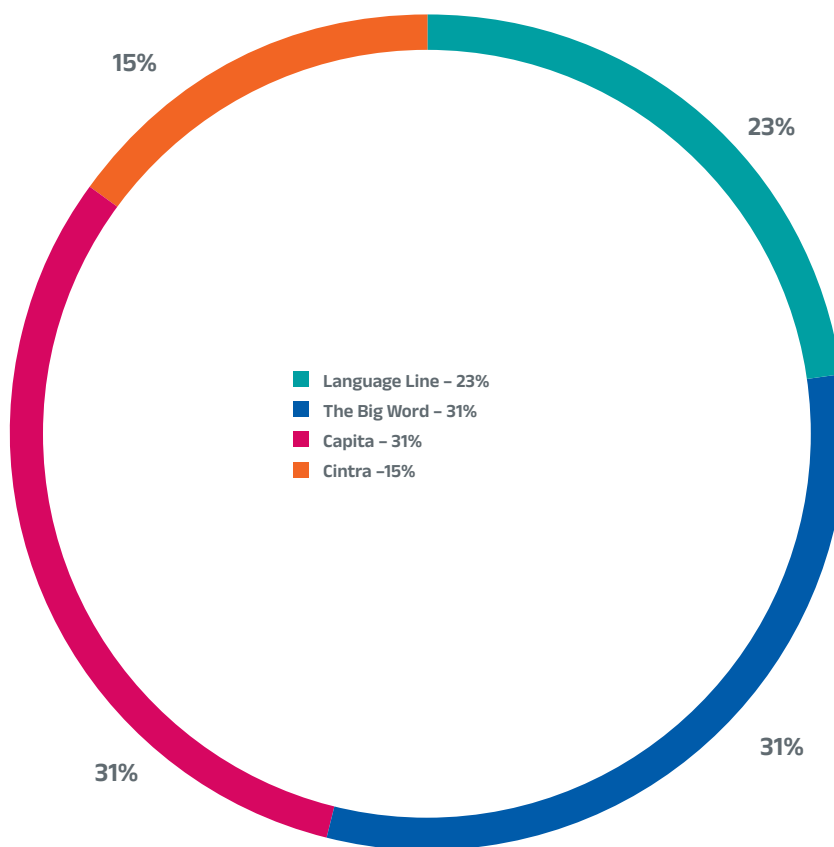
¹⁵⁸ Devon and Cornwall Constabulary, Essex Police, Metropolitan Police Service and Wiltshire Police.

¹⁵⁹ British Transport Police and Metropolitan Police Service.

6.12 30 police forces answered this question and 19 did not. Nine forces that did not answer the question had not answered any questions in the FOI request on the basis of an exemption,¹⁶⁰ one provided some information in the spirit of cooperation despite relying on an exemption, though not in relation to this question,¹⁶¹ and one said no information was held in respect of this question.¹⁶² Two forces said that they did not hold the required information¹⁶³ and six forces did not give a reason.¹⁶⁴

6.13 All 30 forces that answered mentioned use of an LSP. Particular LSPs were named by 12 forces, including Language Line,¹⁶⁵ Capita,¹⁶⁶ The Big Word¹⁶⁷ and Cintra,¹⁶⁸ with Language Line and Capita mentioned most frequently. Norfolk and Suffolk Constabularies mentioned that they use both Capita and Cintra. However, several respondent forces did not include information on their provider(s).¹⁶⁹

Figure 9: Language Service Providers used



¹⁶⁰ Derbyshire Constabulary, Dorset Police, Greater Manchester Police, Hampshire Constabulary, Humberside Police, Kent Police, Port of Dover Police, Sussex Police and West Yorkshire Police.

¹⁶¹ Nottinghamshire Police.

¹⁶² Ministry of Defence Police.

¹⁶³ British Transport Police and Lincolnshire Police.

¹⁶⁴ Gloucestershire Constabulary, Metropolitan Police, Bedfordshire Police, Cambridgeshire Constabulary, City of London Police, Durham Constabulary and Hertfordshire Constabulary.

¹⁶⁵ Civil Nuclear Constabulary, Devon and Cornwall Constabulary, Dyfed-Powys Police, and Gwent Police.

¹⁶⁶ Norfolk and Suffolk Constabularies, South Wales Police, South Yorkshire Police and Cheshire Constabulary.

¹⁶⁷ Essex Police, North Wales Police and Northumbria Police.

¹⁶⁸ Norfolk and Suffolk Constabularies and West Midlands Police.

¹⁶⁹ Avon and Somerset Constabulary, British Transport Police, Cleveland Police, Cumbria Constabulary, Devon and Cornwall Constabulary, Lancashire Constabulary, Leicestershire Constabulary, North Yorkshire Police, Northamptonshire Police,

Police Scotland, Police Service of Northern Ireland, Staffordshire Police, Surrey Police, Thames Valley Police, Warwickshire Police, West Mercia Police and Wiltshire Police.

6.14 Procedures for accessing language assistance services:

Forces described similar procedures for obtaining translation or interpretation support. Most of these responses appeared to relate to conducting witness interviews or custodial interrogations.

(a) Face-to-face interpretation and written translation: 12 forces stated that, if face-to-face or written interpretation or translation services were required, an interpreter or translator could be booked using the booking portal, online form, designated email address or telephone number of the LSP.¹⁷⁰ Five forces specified that an officer would book the service in this way.¹⁷¹

(b) Telephone interpretation: Ten forces stated that an officer could access telephone interpretation by calling the telephone number of the LSP¹⁷² (in some cases giving a special PIN).¹⁷³ Interpreters could then be conferenced in to an in-person interview via a telephone set in the interview room. One force described a “live link-in facility” which connected to an interpreter immediately.¹⁷⁴ Two forces¹⁷⁵ mentioned that their LSP has an application that provides fast or immediate access to telephone interpreters for officers and staff in public settings, facilitating other law enforcement operations. Other forces did not explicitly state that immediate translation or interpretation assistance could be organised.

6.15 Use of other providers in addition to a contracted LSP:

Six forces described using providers other than their contracted LSP to fulfil interpretation/translation needs where appropriate. This included:

(a) off-contract arrangements with a back-up LSP, such as a provider from the Association of Police and Court Interpreters, to ensure adequate coverage, or another organisation whose interpreters had the relevant qualifications and vetting clearance,¹⁷⁶

(b) use of the Witness Intermediary Scheme, whereby all witnesses considered vulnerable can obtain help from an intermediary if, for example, it becomes apparent that there is a communication issue;¹⁷⁷

(c) use of an Independent Local Language Adviser for translation and interpretation in relation to community issues and meetings (i.e. non-evidential issues);¹⁷⁸ and

(d) use of the Wales Interpretation and Translation Service, which provides translations and interpretations for the public sector.¹⁷⁹

6.16 PAIT Scheme:

(a) five forces referenced the PAIT scheme;¹⁸⁰

(b) one force described that it sources PAIT-approved linguists wherever possible. If it could not source a PAIT-approved linguist, the force had the option to accept a non-PAIT-approved linguist after conducting a risk assessment and with authorisation from an officer of at least the rank of inspector,¹⁸¹ and

(c) another force said it has specifically requested of its LSP that all translators and interpreters for evidential bookings are PAIT-approved, but that it sometimes uses non-PAIT-approved linguists for non-evidential bookings or for evidential bookings if approved by an inspector.¹⁸²

6.17 All forces that answered this question described how procedures were in place for access to interpretation and translation services through an LSP.

6.18 Generally, not all forces stated whether they were using PAIT-registered and approved linguists.

170_Cumbria Constabulary, Dyfed-Powys Police, Lancashire Constabulary, North Yorkshire Police, Surrey Police, Warwickshire Police, West Mercia Police, West Midlands Police, Wiltshire Police, Northamptonshire Police, Staffordshire Police and Essex Police.

171_Cumbria Constabulary, Dyfed-Powys Police, Lancashire Constabulary, Northamptonshire Police and Surrey Police.

172_Cumbria Constabulary, Dyfed-Powys Police, Gwent Police, Lancashire Constabulary, Leicestershire Constabulary, North Yorkshire Police, Surrey Police, Northamptonshire Police, Warwickshire Police and Wiltshire Police.

173_Wiltshire Police and Lancashire Constabulary.

174_North Yorkshire Police.

175_North Yorkshire Police and Leicestershire Constabulary.

176_Lancashire Constabulary, Essex Police and Merseyside Police.

177_Northumbria Police.

178_Devon and Cornwall Constabulary.

179_Gwent Police.

180_Wiltshire Police, Avon and Somerset Constabulary, Lancashire Constabulary, Leicestershire Constabulary and Merseyside Police.

181_Avon and Somerset Constabulary.

182_Lancashire Constabulary.

INITIAL REQUEST

4.3 Please confirm the financial budget/funding allocated by the police force for providing the access to professional interpretation, translation services and/or any other tailored support.

6.19 35 police forces answered this question and 14 did not. Of the 14 forces that did not answer the question, nine had not answered any questions in the FOI request on the basis of an exemption¹⁸³ and one provided some information in the spirit of cooperation despite relying on an exemption, though not in relation to this question.¹⁸⁴ The remaining four forces answered some questions in the FOI request but did not give a reason for their lack of response to this question.¹⁸⁵

6.20 Of the 35 forces that did answer the question:

- (a) two forces said they had a budget for access to professional interpretation/translation services or other tailored support but could not disclose it. Cumbria Constabulary's budget for language services is determined by the LSP contract pricing schedule and Gwent Police said they had not disclosed their budget as it did not relate specifically to services for victims;
- (b) three forces did not provide their data in an easily accessible format;¹⁸⁶
- (c) four forces¹⁸⁷ said that their budget for this area was zero (three of these¹⁸⁸ stipulated that funding for translation and interpretation services was still allocated but on an as-needed basis – one of these forces¹⁸⁹ provided its average spend);

(d) six forces disclosed data, albeit the reference point varied; for example, their budget for the 2020-2021 or 2021-2022 financial year or their average spend on interpretation and translation per year (this includes the force mentioned at point (c) above). Gloucestershire Constabulary disclosed both its budget and its average spend;¹⁹⁰ and

(e) 20 forces disclosed their budget for professional interpretation or translation services and/or any other tailored support for the 2022-2023 financial year.¹⁹¹



¹⁸³ Derbyshire Constabulary, Dorset Police, Greater Manchester Police, Hampshire Constabulary, Humberside Police, Kent Police, Port of Dover Police, Sussex Police and West Yorkshire Police.

¹⁸⁴ Nottinghamshire Police.

¹⁸⁵ Leicestershire Constabulary, Thames Valley Police, Durham Constabulary and Avon and Somerset Constabulary.

¹⁸⁶ Hertfordshire Constabulary, South Wales Police and South Yorkshire Police.

¹⁸⁷ Civil Nuclear Constabulary, Bedfordshire Police, Ministry of Defence Police and Police Service of Northern Ireland.

¹⁸⁸ Bedfordshire Police, Ministry of Defence Police and Police Service of Northern Ireland.

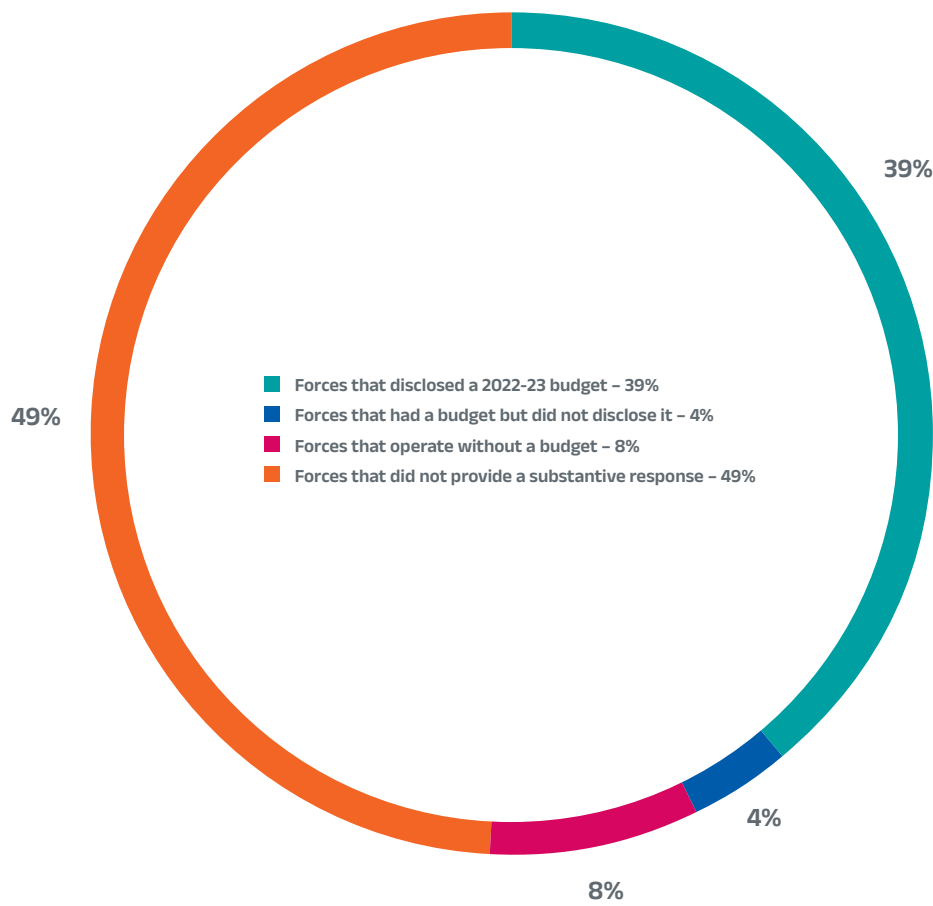
¹⁸⁹ Bedfordshire Police.

¹⁹⁰ Bedfordshire Police, Cheshire Constabulary, Police Scotland, Essex Police, Lancashire Constabulary and Gloucestershire Constabulary.

¹⁹¹ Metropolitan Police Service, West Midlands Police, Norfolk and Suffolk Constabularies, British Transport Police, Cambridgeshire Constabulary, Northamptonshire Police, West Mercia Police, Lincolnshire Police, Northumbria Police, Staffordshire Police, Devon and Cornwall Constabulary, Wiltshire Police, Dyfed-Powys Police, Gloucestershire Constabulary, Warwickshire Police, Cleveland Police, North Wales Police, City of London Police and Merseyside Police.

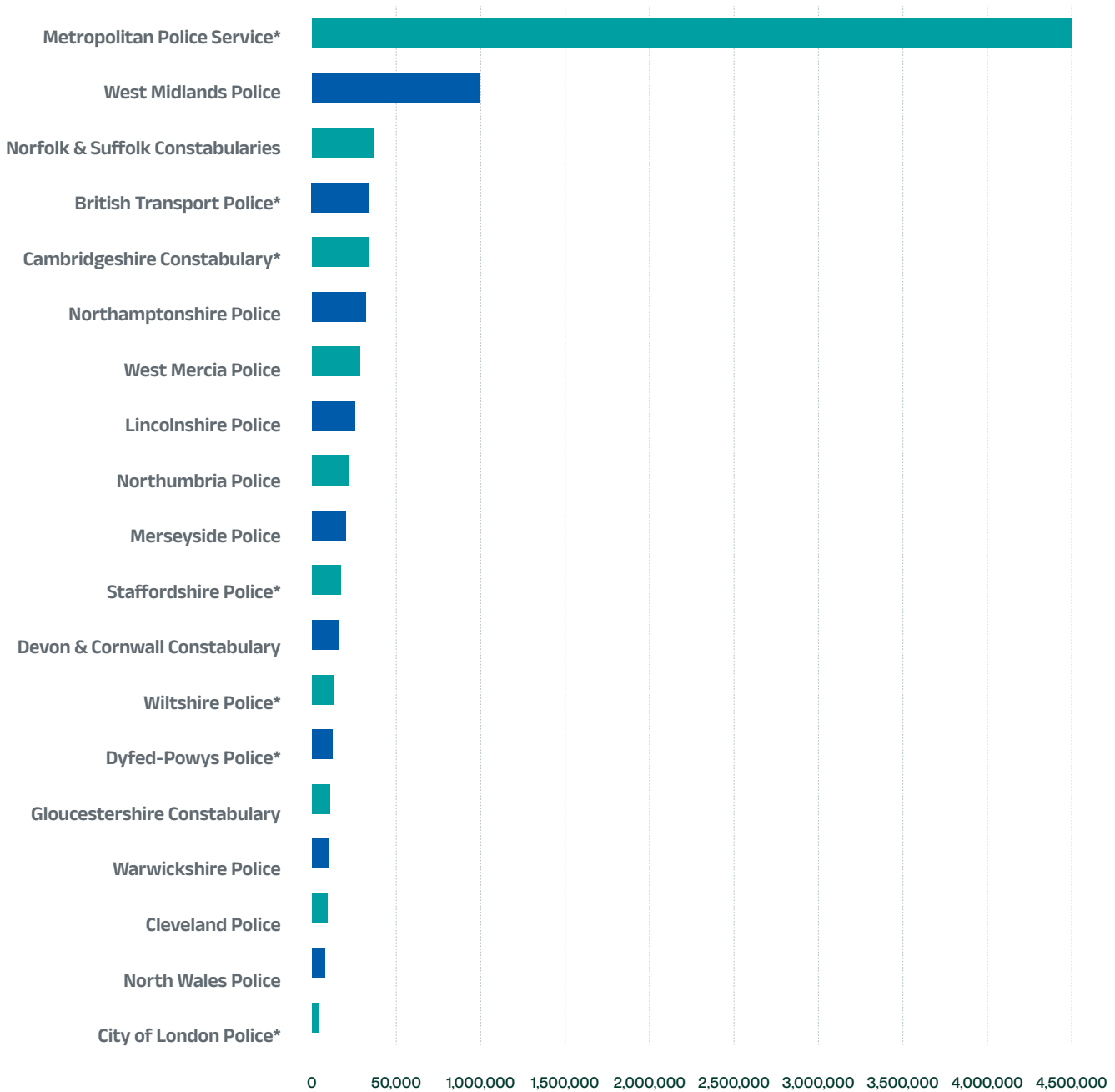
6.21 Figure 10 summarises the responses to this question:

Figure 10: Responses provided to question 4.3 (financial budget/funding allocated by the police force for providing access to professional interpretation, translation services and/or any other tailored support)



6.22 Figure 11 presents data from the 20 forces that disclosed their budget for professional interpretation and translation services and/or other tailored support:

Figure 11: Budget for professional interpretation and translation services and/or other tailored support (in £)



Forces marked with an asterisk in the figure above are those that did not stipulate for which financial year this budget applied; for the others it was 2022-2023.

6.23 It is noted that the figure above and the responses extracted below do not take into account the relative population of each area and the diversity of that population, which is likely to be relevant to demand for interpretation and translation services.

6.24 The mean budget across these 20 forces was £453,336 (including the Metropolitan Police Service) and £228,521 (excluding the Metropolitan Police Service). Police forces had a range of budgets in place for translation and interpretation services, ranging from £44,000 (City of London Police) to £4.5 million (Metropolitan Police Service).

6.25 Two forces provided the proportion of their budget for translation and/or interpretation dedicated to custody services. For Dyfed-Powys Police, custody services made up 77% of the budget and 77% of Gloucestershire Constabulary's annual spend on translation and interpretation was specifically on custody services.

6.26 Almost half of the forces surveyed had a budget in place for interpretation or translation services in the 2022-2023 financial year. Ten forces either disclosed alternative information or said that they did not have a budget. However, of the four forces that did not have a budget, three said they still made provisions for professional interpretation and translation services. The force that did not stipulate this was the Civil Nuclear Constabulary, which may have less need for specific budget for translation and interpretation services in any case.

INITIAL REQUEST

4.4 Does the police force have access to a set of volunteers that might enhance language support wherever possible?

6.27 29 police forces answered this question and 20 did not. Of those forces that did not answer the question, nine had not answered any questions in the FOI request on the basis of an exemption,¹⁹² one provided some information in the spirit of cooperation despite relying on an exemption, though not in relation to this question,¹⁹³ and one said no information was held in respect of this question.¹⁹⁴ Nine forces had answered some questions in the FOI request but did not provide a reason for not responding to this question in particular.¹⁹⁵

¹⁹² Derbyshire Constabulary, Dorset Police, Greater Manchester Police, Hampshire Constabulary, Humberside Police, Kent Police, Port of Dover Police, Sussex Police and West Yorkshire Police.

¹⁹³ Nottinghamshire Police.

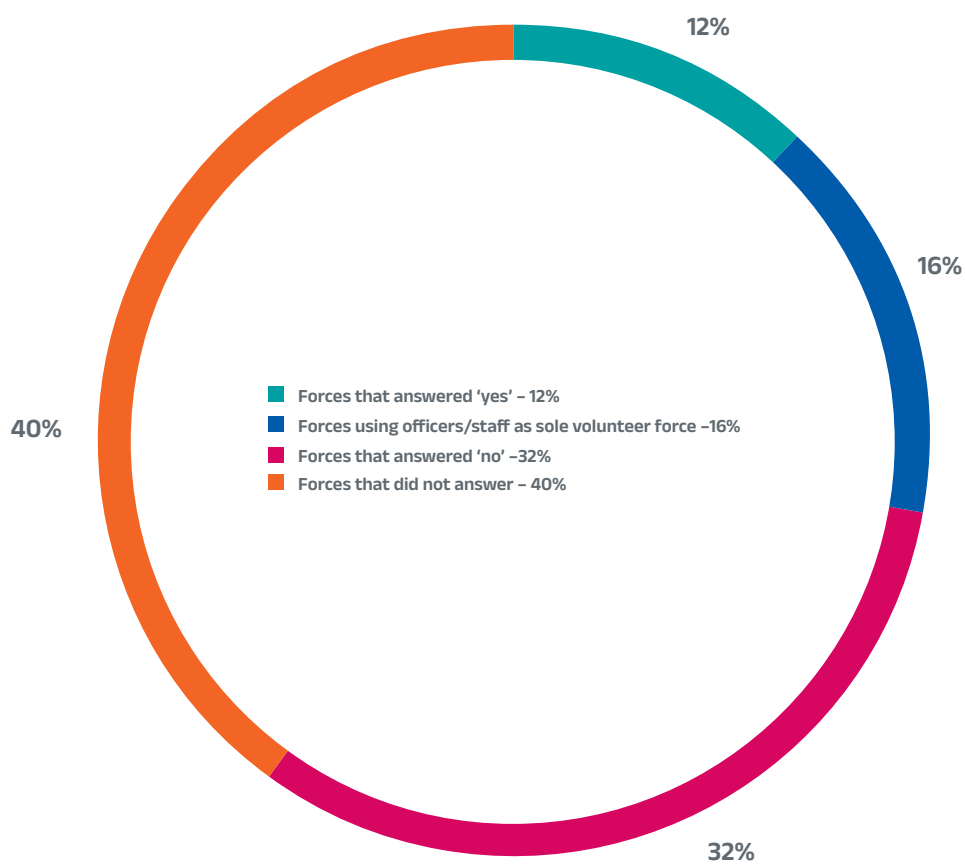
¹⁹⁴ Ministry of Defence Police.

¹⁹⁵ Avon and Somerset Constabulary, Cheshire Constabulary, Gloucestershire Constabulary, Leicestershire Constabulary, Norfolk and Suffolk Constabularies, South Wales Police, South Yorkshire Police and Thames Valley Police.



6.28 Figure 12 presents the range of responses to this question from the forces surveyed:

Figure 12: Range of responses to question 4.4 on whether police forces have access to a set of volunteers that might enhance language support wherever possible



6.29 16 forces that responded to this question did not have access to a set of volunteers to enhance language support.¹⁹⁶

6.30 Of the six forces that said they did have access to volunteers,¹⁹⁷ only two provided further information to clarify that response. One force currently retains two police support volunteers who speak Polish, and that force was trying to seek out more volunteers with language skills.¹⁹⁸ Another force referred to the use of advocates, intermediaries and family members and carers for translation and interpretation support.¹⁹⁹

6.31 Seven police forces stated that they use officers or police staff as translation support. Three of these forces²⁰⁰ clarified that they permitted officers or staff with foreign language skills to assist only with non-evidential work.²⁰¹ Four of these forces merely stated that they permitted officers and staff with language skills to assist with translation/interpretation where relevant.²⁰² Two of these forces said that they kept a list of officers and staff with language skills.²⁰³

RECOMMENDATIONS

From the responses received to the questions in this section, police forces generally have arrangements in place to ensure that victims of crime are able to access translation and interpretation services to facilitate their communication with officers.

Based on the responses provided, it is recommended that all police forces:

- (a) Allocate a specific budget for interpretation and translation services to ensure these services are provided when necessary and to a high standard.
- (b) Rely exclusively on accredited interpreters/translators such as those on the Police Approved Interpreters and Translators Scheme (PAIT) to ensure the accuracy and consistency of victims' testimonies.
- (c) Avoid the use of volunteer interpreters/translators (e.g. police officers with the relevant language skills) to enhance the accuracy of victims' testimonies and protect police resources.
- (d) Take into account the size and diversity of their local population to inform a police force of the number and types of interpreters/translators required.
- (e) Record data in an accessible format on the number of available interpreters and the number of instances of interpretation organised for victims to assist with future analysis.

196. British Transport Police, Civil Nuclear Constabulary, Cleveland Police, Cumbria Constabulary, Dyfed-Powys Police, Gwent Police, Hertfordshire Constabulary, Ministry of Defence Police, North Wales Police, North Yorkshire Police, Northumbria Police, Police Service of Northern Ireland, Surrey Police, Warwickshire Police, West Mercia Police and Merseyside Police.

197. Cambridgeshire Constabulary, Devon and Cornwall Constabulary, Essex Police, Northamptonshire Police, Staffordshire Police and Wiltshire Police.

198. Essex Police.

199. Cleveland Police.

200. Bedfordshire Police, Lincolnshire Police and Metropolitan Police Service.

201. This is in line with the College of Policing's "Briefing note: Using language services", which stipulates that a police officer or staff member with language skills must not act as an interpreter for another investigator to obtain evidential statements or information. Available at: <https://library.college.police.uk/docs/college-of-policing/Language-Services-v1.0.pdf> (accessed 8 August 2023).

202. West Midlands Police, Lancashire Constabulary, City of London Police and Police Scotland.

203. City of London Police and Metropolitan Police Service.

APPENDIX 1



INITIAL REQUESTS

1. CLASSIFICATION

1.1 Do you classify victims with limited or no English speaking, reading and/or writing skills and other communication barriers as “vulnerable” under the Vulnerability Assessment Framework?

1.2 If not, has your police force assessed whether having limited or no English skills is a form of vulnerability? (a) If so, what form did that assessment take and what was its outcome; or (b) if not, why not?

2. TRAINING

2.1 How many police officers were employed by your force between 1 January 2020 to 1 January 2021? This includes police officers of all ranks from frontline to management, including on duty and off duty officers.

2.2 Please identify what (if any) mandatory training courses the aforementioned police officers employed between 2020-2021 were required to attend on the issue of victims and witnesses with communication barriers. If no such mandatory training courses are in place, why not?

If mandatory training courses are in place:

2.3 Please specify the contents of the mandatory training courses on the issue of victims and witnesses with communication barriers.

2.4 Please confirm whether the mandatory training courses include:

- (a) the legal definition of the term “vulnerable”;
- (b) communication barrier indicators such as a lack of English language or disabilities;
- (c) the duty of police officers to identify victims’/ witnesses’ communication barriers;
- (d) the duty of police officers to take reasonable steps to ensure that the vulnerable victims and witnesses with communication barriers receive the same service as those without such vulnerabilities, such as securing an interpreter (foreign language/sign language);
- (e) the duty of police officers to take reasonable steps to ensure that the Victims Code is applied in the same way to victims with communication barriers (this includes the right to receive updates, the right to provide a statement and the right to seek a review of a decision to take no further action);
- (f) the mechanisms in place in your police force to assist vulnerable witnesses and victims with communication barriers to give evidence in support of an investigation (such as providing guidance on Achieving Best Evidence (ABE) interviews, special measures at court etc.); and
- (g) the duty of police officers to assess victims for Victim Support Services and to make such referrals where deemed suitable.

2.5 Please confirm how many police officers employed by your force (see question 2.1 above) attended and studied the mandatory training courses between 1 January 2020 and 1 January 2021.

2.6 Please confirm the duration and mode (i.e. lecture/e-learning) of the mandatory courses.

2.7 Please confirm whether the police officers were required to attend Continuing Professional Development sessions on vulnerable witnesses with communication barriers, or whether the mandatory courses were limited to one session only.

2.8 Please confirm how police officers' attendance and study of the mandatory course were monitored.

2.9 Please confirm how the police officers' understanding and competence in this course were examined.

3. ENGAGEMENT WITH VULNERABLE VICTIMS OF CRIME

3.1 Does the police force record the number of victims of crime with English as a second language? If yes, how many such victims were recorded between 1 January 2020 to 1 January 2021?

3.2 Does the police force record the first and other languages of victims with communication barriers at every point of contact? If yes, please provide this data.

3.3 Please confirm whether written communications are provided to such victims in easy-to-read or pictorial formats.

4. PROFESSIONAL INTERPRETATION AND TRANSLATION SERVICES

4.1 Does the police force organise "competent" and "accredited" interpreters for interviews and translation of key documents for victims with communication barriers? If yes, how many interpreters were organised for such victims between 1 January 2020 and 1 January 2021?

4.2 Please provide all procedures for officers and staff on how to access language assistance services under different circumstances, including when receiving and responding to requests for assistance, making enforcement stops, conducting field investigations and witness interviews, conducting custodial interrogations and performing other law enforcement operations.

4.3 Please confirm the financial budget/funding allocated by the police force for providing the access to professional interpretation, translation services and/or any other tailored support.

4.4 Does the police force have access to a set of volunteers that might enhance language support wherever possible?

5. ANCILLARY

5.1 If you are not able to answer any question in this FOI request, why not?

5.2 If you are not able to answer any question, does the data exist for that question?

5.3 If the data does not exist, why not?

APPENDIX 2

GLOSSARY

AOS	Allen Overy Shearman Sterling LLP
ABE	Achieving Best Evidence
CAB	Citizens Advice Bureau
CPD	Continuing Professional Development
DDVC	Destitution Domestic Violence Concession
DHEP	Degree Holder Entry Programme
EU	European Union
FOI	Freedom of Information
FOIA 2000	Freedom of Information Act 2000
GMLC	Greater Manchester Law Centre
IFC	Initial Foundation Course
IPLDP	Initial Police Learning and Development Programme
LSP	Language Services Provider
P	Client P
PACE	Police and Criminal Evidence Act 1984
PAIT	Police Approved Interpreters and Translators
PCDA	Police Constable Degree Apprenticeship
PEQF	Policing Education Qualifications Framework
PIN	Personal Identification Number
PIP	Professionalising Investigations Programme
RNIB	Royal National Institute of Blind People
UK	United Kingdom of Great Britain and Northern Ireland
VAF	Vulnerability Assessment Framework
VCOP	Victims Code of Practice

APPENDIX 3

LIST OF POLICE FORCES APPROACHED

1. Avon and Somerset Police
2. Bedfordshire Police
3. British Transport Police
4. Cambridgeshire Constabulary
5. Cheshire Constabulary
6. City of London Police
7. Civil Nuclear Constabulary
8. Cleveland Police
9. Cumbria Constabulary
10. Derbyshire Constabulary
11. Devon and Cornwall Constabulary
12. Dorset Police
13. Durham Constabulary
14. Dyfed-Powys Police
15. Essex Police
16. Gloucestershire Constabulary
17. Greater Manchester Police
18. Gwent Police
19. Hampshire Constabulary
20. Hertfordshire Constabulary
21. Humberside Police
22. Kent Police
23. Lancashire Constabulary
24. Leicestershire Constabulary
25. Lincolnshire Constabulary
26. Merseyside Police
27. Metropolitan Police
28. Ministry of Defence Police
29. Norfolk Constabulary
30. North Wales Police
31. North Yorkshire Police
32. Northamptonshire Police
33. Northumbria Police
34. Nottinghamshire Police
35. Police Scotland
36. Police Service of Northern Ireland
37. Port of Dover Police
38. South Wales Police
39. South Yorkshire Police
40. Staffordshire Police
41. Suffolk Constabulary
42. Surrey Police
43. Sussex Police
44. Thames Valley Police
45. Warwickshire Police
46. West Mercia Police
47. West Midlands Police
48. West Yorkshire Police
49. Wiltshire Police

APPENDIX 4

ALTERNATE INITIAL REQUEST

1. CLASSIFICATION

Question 1.1: Please provide documents which show whether your police force has classified victims with limited or no English speaking, reading and/or writing skills and other communication barriers as “vulnerable” under the Vulnerability Assessment Framework.

Question 1.2: Please provide documents that specify the indicators (if any) used by your police force for determining whether having limited or no English skills is a form of vulnerability.

2. TRAINING

Question 2.1: Please provide information on the mandatory training courses that the police officers employed between 1 January 2020 and 1 January 2021 were required to attend on the issue of victims and witnesses with communication barriers.²⁰⁴

If mandatory training courses are in place:

Question 2.2: Please provide information on the contents of the mandatory training courses relating to the issue of victims and witnesses with communication barriers.

Question 2.3: Please provide information on the number of police officers employed by your force who attended and studied the mandatory training courses between 1 January 2020 and 1 January 2021.

Question 2.4: Please provide information on the duration and mode (i.e. lecture/e-learning) of the mandatory training courses.

Question 2.5: Please provide information on the number of sessions that the police officers were mandatorily required to attend as part of their Continuing Professional Development on vulnerable witnesses with communication barriers.

3. ENGAGEMENT WITH VULNERABLE VICTIMS OF CRIME

Question 3.1: Please provide information on the number of victims with communication barriers that your police force recorded between 1 January 2020 and 1 January 2021.

Question 3.2: Please provide data on how frequently the language capabilities of victims with communication barriers are recorded by police officers.

Question 3.3: Please provide information which shows the form in which written communications are provided to victims with communication barriers.

4. PROFESSIONAL INTERPRETATION AND TRANSLATION SERVICES

Question 4.1: Please provide information on the number of interpreters that your police force used for interviews and translation of key documents for victims with communication barriers between 1 January 2020 and 1 January 2021.

Question 4.2: Please provide documents that specify the indicators used by your police force to determine the competency of such interpreters.

Question 4.3: Please provide documents which contain the procedures for officers and staff on how to access language assistance services under different circumstances, including when receiving and responding to requests for assistance, making enforcement stops, conducting field investigations and witness interviews, conducting custodial interrogations and performing other law enforcement operations.

Question 4.4: Please provide information on the financial budget/funding allocated by your police force to professional interpretation, translation services and/or any other tailored support required for victims with communication barriers.

Question 4.5: Please provide information on the number of volunteers that your police force has access to for enhancing language support wherever possible.

5. ANCILLARY

Question 5.1: If you are not able to answer any question in this FOI request, please explain why not.

Question 5.2: If you are not able to answer any question, please confirm whether the data exists for that question.

²⁰⁴“Communication barriers” is not an exhaustive term but commonly will include anyone with limited or no English skills or disabilities such as deaf or deaf-mute individuals.

