

**Force Disclosure Unit**

Wiltshire Police HQ

London Road

Devizes

Wiltshire

SN10 2DN

Tel 101 ext 62005

www.wiltshire.police.ukdisclosure@wiltshire.pnn.police.ukDate: 13th July 2022

Your ref: FOI

Our ref: FOI 2022 / 440

Dear ***,

I write in connection with your request for information dated 13th June 2022 concerning Victims with English as a second language.

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

Your request for information has now been considered and I am not obliged to supply the information you have requested.

You wrote:**1. Classification**

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.

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

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 barriers¹.

If mandatory training courses are in place:

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

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 to 1 January 2021.

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

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.



INVESTOR IN PEOPLE

3. Engagement with vulnerable victims of crime

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

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

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

4. Professional Interpretation and Translation services

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 to 1 January 2021.

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

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.

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. ANSWERS RECIVED FROM SARAH HOLBROOK.

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

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

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

Our response:

The information that you are requesting, for all of Section 3 and for question 1.1, is not stored in a way which permits easy retrieval.

For all the questions in section 3 - we currently do not have the capability within our systems to flag for this information which can then be analysed quickly and easily. The ascertaining of this information would only be possible by manually reading through every crime profile, crime report and possibly even interviews to determine the number of victims with communication barriers and how frequently the language capabilities of victims with communication barriers are recorded. The same process would also need to be carried out to determine the form in which written communications are provided to victims with communications barriers.

As for question 1.1, the information requested cannot be easily accessed. Although we can filter and find those classed as vulnerable, we do not record what language they speak, nor can we sub-filter into ethnicity. Therefore, in order to determine this data, we would be required to manually go through every vulnerable person's occurrence, of which I have been advised there were 681 recorded last month alone.

Under the circumstances I am absolutely confident that to locate, retrieve and extract the information you seek would by far exceed the time obligations upon this authority to comply, and in so doing would exceed the fees limits. This is set at £450 calculated at a flat rate of £25 per hour for those work activities comprising of confirming the information is held, locating it, retrieving it and extracting it.

Although excess cost removes the forces' obligations under the Freedom of Information Act, as a gesture of goodwill I have supplied information, relative to your request, retrieved or available before it was realised that the fees limit would be exceeded. I trust this is helpful, but it does not

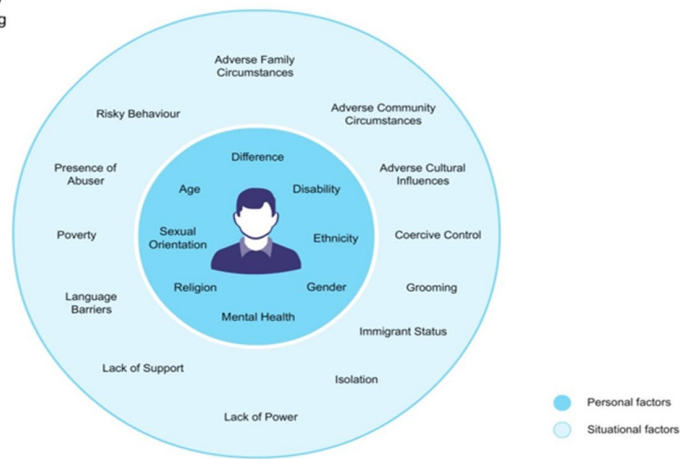
affect our legal right to rely on the fees regulations for the remainder of your request. What I am able to provide you are the answers documented below:

1. Classification

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.

Please see image below.

Vulnerability
an aid to understanding



Copyright College of Policing 2017

2. Training

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 barriers¹.

If mandatory training courses are in place:

PIP1 VICTIM AND WITNESS Categories of witnesses & victims, special measures

PIP1 VICTIM AND WITNESS Question types & account clarification, communication skills

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

Importance of caring for the victim

- Complying with the Victims' Code
- Taking victim concerns seriously
- Quality of treatment and empathy
- Follow-up
- Understanding and managing victim expectations

Dealing with victims, witnesses, and suspects in an ethical manner

Identifying vulnerability and supporting/managing the welfare of victims and witnesses in accordance with the Victims' Code

Specialist roles and multi-agency approaches for supporting and safeguarding victims and witnesses, particularly in relation to public protection incidents e.g., domestic abuse

How achieving best evidence (ABE) begins when taking an initial account from victims and witnesses

Strategies for communicating with victims and witnesses

Additional support for vulnerable, intimidated, significant witnesses etc.

Victims and victimology:

- Risk and vulnerability
- Repeat victimization

Legislation, policies and 'what works' in relation to vulnerable people or those at risk of harm, including:

- Mental Health Act 1983: Code of Practice (2015)
- Children Act 1989 and 2004
- Mental Capacity Act 2005
- Safeguarding Disabled Children – Practice Guidance 2009
- Achieving Best Evidence 2011
- Care Act 2014
- Code of Practice for Victims of Crime 2015
- Working Together to Safeguard Children 2015
- Serious Crime Act 2015
- Information sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers 2015

Initial assessment of the victim's needs

1 Explain the law, policy, and potential complexities associated with the treatment of victims and witnesses

2 Understand the good practice and appropriate behaviours and attitudes required when dealing with victims and witnesses

3 Understand the requirements of an initial assessment as part of first contact and the appropriate ongoing care

4 Explain the various types of justice outcomes and the processes to manage victims through the Criminal Justice System (CJS)

Ensuring victims and witnesses are dealt with fairly, with respect and in an ethical and non-biased manner:

- The Code of Ethics
- Procedural justice

Behavioural skills that can provide additional support to victims and witnesses e.g.

- Acting with compassion, empathy, and kindness

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 to 1 January 2021.

IPLDP 57

IPL 54

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

IPLDP Classroom training

IPL Synchronous Online training

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.

Not applicable to Initial learning.

4. Professional Interpretation and Translation services

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 to 1 January 2021. **The force used 120 interpreters/suppliers between Jan-Dec2020. Some of them were used multiple times.**

4.2 Please provide documents that specify the indicators used by your police force to determine the competency of such interpreters. **Please see attached PAIT Spec Table V13.**

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.

Face to Face

Sign into an online portal

Create booking requests by submitting details of the request online.

Telephone Interpreting

Call a specified number from any phone

Request telephone interpreting services via a Personal Identification Number.

Translation

Sign into an online portal

Create translation service requests by submitting details of the request online.

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. **Total budget £125,798**

4.5 Please provide information on the number of volunteers that your police force has access to for enhancing language support wherever possible. **3**

Ordinarily under our section 16 duty to provide advice and assistance, we would advise you how to refine your request in respect of section 3 and question 1.1 to a more manageable level. However, due to the difficulties outlined above, I cannot see how this can be achieved in this particular case.

Section 17 of the Freedom of Information Act 2000 requires the Wiltshire Police, when refusing to provide such information (because the information is exempt) to provide you the applicant with a notice which: (a) states that fact, (b) specifies the exemption in question and (c) states (if that would not otherwise be apparent) why the exemption applies.

The exemption applicable to the information requested is:

Section 12: Exemption where cost of compliance exceeds appropriate limit

- (1) Section 1(1) does not oblige a public authority to comply with a request for information if the authority estimates that the cost of complying with the request would exceed the appropriate limit.

In accordance with section 17 of the Act, this letter represents a Refusal Notice for this particular request.

I am satisfied that all the relevant information has been passed to me and been considered in the light of your request within the time constraints applicable under the legislation.

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

Yours sincerely,

Disclosure Decision Maker

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



Force Disclosure Unit

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

Freedom of Information Request Appeals Procedure

1. Who Can Ask for a Review

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

2. How to Request a Review

Requests for review of a Freedom of Information request must be made in writing to the:
Force Disclosure Unit
Wiltshire Police Headquarters,
London Road, Devizes,
Wiltshire,
SN10 2DN

Email at disclosure@wiltshire.pnn.police.uk.

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

3. Review Procedure

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

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

4. Conclusion of the Appeal

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

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
Tel: 01625 545 700
Fax: 01625 524 510
Email: mail@ico.gsi.gov.uk