



29500 Policy – Policing with Deaf, Deafblind, Deafened & Hard of Hearing People.

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Equality Impact Assessment:	High
Owning department:	Local Policing Support

About this Policy

- 1.1. This policy explains how Hampshire Constabulary will approach policing issues with members of the public who are, or appear to be, Deaf, deafblind, deafened or hard of hearing.
- 1.2. This policy is primarily aimed at police officers and police staff who have direct or indirect contact with members of the public, to whom this policy relates; it can include all policing situations.
- 1.3. For ease of reference, the term 'deaf people' will be used throughout this policy document to denote all associated groups referred to at 1.1 above.

General Principles

- 2.1. The Police Service has a duty to provide a citizen-focused service to the public, especially victims and witnesses, which responds to the needs of individuals and communities and inspires confidence in the police.
- 2.2. Hampshire Constabulary is committed to providing an excellent policing service, aligned to the six areas of focus, whilst ensuring the service is built around the needs of victims. The needs of others in the process must not be ignored. Suspects and detainees must be treated with respect and reasonable adjustments applied as necessary.
- 2.3. Hampshire Constabulary has created a Deaf Access Strategy and is working to mainstream and embed accessible deaf services throughout the organisation. In one sentence, the Deaf Access Strategy vision is: "Deaf people having full access to Hampshire Constabulary."
- 2.4. Hampshire Constabulary is committed to the fair treatment of people in line with the Equality Act 2010 and recognises the nine protected characteristics, namely Age, Disability, Gender Reassignment, Marriage and civil partnership, Pregnancy and maternity, Race, Religion or belief, Sex and Sexual orientation.

- 2.5. The Equality Act 2010 states that it is unlawful to treat a person less favourably because of disability. Disability is described in the Act as being a physical or mental impairment, which has a substantial and long-term adverse effect on a person's ability to carry out normal day-to-day activities.
- 2.6. Victims can be traumatised by events they have witnessed. Inaccessible services have the potential to re-traumatise victims; therefore, getting access right first time truly is about supporting victims.
- 2.7. Hampshire Constabulary will comply with the Public Sector Equality Duty (PSED), which was created by Section 149 of the Equality Act 2010. The PSED has three main aims where public bodies must show due regard to:
 - 2.7.1. **Eliminate unlawful discrimination, harassment and victimization** and any other conduct prohibited by the Act;
 - 2.7.2. **Advance equality of opportunity** between people who share a protected characteristic and people who do not share it; and
 - 2.7.3. **Foster good relations** between people who share a protected characteristic and people who do not share it.
- 2.8. Hampshire Constabulary recognises both the medical and the social models of disability. Some people will decide that medical intervention is the preferred means of overcoming a physical problem, condition or impairment. The Social Model identifies that it is the barriers – physical, attitudinal and institutional – present in society that prevent Disabled People from taking part in everyday life. That is to say that impairment is not actually the problem. If access is correct, whilst the impairment may still exist, there is no disability.

Statement of Policy

- 3.1. Hampshire Constabulary will comply with the legislation and guidance that affects people to whom this policy relates. In particular, the Human Rights Act 1998; the Equality Act 2010; the Public Sector Equality Duty; the Police & Criminal Evidence Act 1984 (PACE), the National Guidance for the Police Use of Interpreters, the Ministry of Justice Witness Charter and the Crown Prosecution Service Code of Practice for Victims of Crime.
- 3.2. Hampshire Constabulary aims to provide a high quality service, responsive to the needs and wishes of service users.
- 3.3. Hampshire Constabulary expects and requires all contact with deaf people to be carried out in strict accordance with current legislation and the guidance provided within the Procedures document associated with this Policy.

- 3.4. Some deaf people may have stronger feelings of isolation; therefore, incidents relating to deaf people can have a disproportionate effect that may result from inaccessible services.
- 3.5. Communication plays a critical role in delivery policing services, in complying with legislation and in demonstrating compliance with the Policing Code of Ethics. Appropriate communication is especially important when dealing with deaf people and recognising the diversity in communication styles. The related Force Procedure provides generic communication advice and further reference material is available on the force intranet Police Link Officers for Deaf people (PLOD) pages.
- 3.6. Hampshire Constabulary will provide communication facilities appropriate to the needs of deaf people but in saying that, it is recognised that it is members of the police who often need communication support to deliver services, rather than deaf people to access service.
- 3.7. This provision includes:
 - 3.7.1. A non-emergency SMS text facility for deaf people and speech impaired people to allow direct contact with the force;
 - 3.7.2. Non-emergency access to the force via Hampshire Constabulary's nonemergency text number for deaf and speech impaired people – 07781 480999.
 - 3.7.3. Emergency access via the emergency SMS 999 (eSMS) national mobile text facility, where registered users can text to the emergency service via a relay service ([Relay UK](#))
 - 3.7.4. Emergency access via the NGTS 18000 emergency textphone service;
 - 3.7.5. A 24-hour facsimile (fax) at the Force Enquiry Centre (FEC);
 - 3.7.6. Police Link Officers for Deaf people (PLOD) with a minimum of BSL Level 2 and completion of the in-force PLOD Course.
 - 3.7.7. Subtitled videos on the Force YouTube channel and bespoke media releases where appropriate;
 - 3.7.8. Advertising accessible numbers on Force literature.

Implications of Policy

- 4.1. The police service is often the gateway to the Criminal Justice System. If police processes are inaccessible, it follows that deaf people can be deprived of justice. Hampshire Constabulary has a duty to provide an accessible service.
- 4.2. Failure to comply with legislation, and unlawful discrimination, could result in legal action against Hampshire Constabulary. Such action can have a human cost as well as financial.
- 4.3. The failure of members of Hampshire Constabulary to deal appropriately with deaf people in accordance with the law and this policy, can seriously affect trust and confidence in the police service. This, in turn, will result in Hampshire Constabulary failing in its compliance with the force Purpose and the Six Areas of Focus, whilst increasing potential risk to deaf people.
- 4.4. We will continue to raise awareness and maintain the promotion of accessible deaf services following the publication of this policy, in line with the Force Deaf Access Strategy.
- 4.5. District Commanders and Heads of Department will ensure their managers are aware of and apply this policy and the associated procedures. All policies and procedures are available on the Force Policy and Procedure library on the intranet.
- 4.6. Advice in relation to Deaf Access issues is available directly from Police Link Officers for Deaf people (PLOD) or from information contained on the force's intranet pages.

Monitoring and Evaluation

- 5.1. The provision of accessible deaf services is overseen by the Deaf Access Lead, who is held accountable by the Chair of the Equality and Inclusion (Disability) Group.
- 5.2. The Deaf Access Lead will also have overall responsibility for the management of the Police Link Officers for Deaf people scheme and will ensure numbers are maintained to deliver a beneficial service.
- 5.3. The Deaf Access Lead will also monitor:
 - The deployment and use of Link Officers, including maintaining the published Link Officer Role Profile and the Coordinator Role Profile;
 - The number of available Link Officers and their geographical spread; □ Development of Link Officers' Communication Skills and monitoring their Continuing Professional Development;
 - The Deaf Access Strategy and it's focus on mainstreaming and embedding accessible deaf services across the organisation;
 - The level of public satisfaction with the service.

- 5.4. The Deaf Access Lead will ensure completion of an Equality Impact Assessment on this policy and supporting procedures.
- 5.5. A summary of PLOD activity and accessible deaf service provision under the Deaf Access Strategy will be reported through the Force Equality and Inclusion (Disability) Group.
- 5.6. As part of the Deaf Access Strategy, we engage with deaf people. This includes accessible meetings to review and feedback on this Policy and the associated Procedure.

Review

- 6.1. The review of this policy will be conducted annually by the Deaf Access Lead. When the next review takes place the constabulary will consider any changes to legislation, legal challenges, developments resulting from the Deaf Access Strategy and any discrepancies raised with regard to the policy and procedures.

Other Related Policies, Procedures and Information Sources

1.1. Related Policies

In reality all police policies and procedures have a relationship to this in that they should all have regard to deaf people. Specific policies are:

- 14800 Policy – Victims & Witnesses;
- 32100 Policy – Custody

1.2. Related Procedures

- 7.2.1. 29501 Procedure – Policing with Deaf, deafblind, deafened and hard of hearing people

1.3. Information Sources

- 7.3.1. Nationally, the sources of information specific to policing are limited and Hampshire Constabulary has led the way in delivering accessible services. A few other police forces have developed their delivery and there is an opportunity to join with them, to share best practice and seek a uniform delivery plan. Legislation provides some information but this has tended to provide the ‘what’ is required without necessarily assisting the ‘how’ it should be provided. Sources of information, therefore, include:

- Guidance: Subtitling Guidance Document.
- [The Human Rights Act 1998](#);

- [The Equality Act 2010;](#)
- [The Public Section Equality Duty, S.149 Equality Act 2010;](#)
- [The Police & Criminal Evidence Act 1984 \(PACE\);](#)
- [CPS Guidance for the Police Use of Interpreters;](#)
- [Achieving Best Evidence in Criminal Proceedings](#)
- [The Victims Code](#)
- [AD203 Equality Impact Assessment](#)

Origin: Local Policing Support