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NRCPD Consultation Response

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ABOUT NUBSLI

NUBSLI is a branch of Unite the union, the UK's second largest union with more than 1.45 million members. It was established at its first branch meeting on 25th June 2014.

Unlike most other branches of Unite the union, the National Union of British Sign Language Interpreters is made up of both employed and self-employed interpreters and translators.

DECLARATION

This report is being submitted as NUBSLI's formal response to the NRCPD's consultation on the proposed Fitness to Practice procedure and Code of Conduct revisions.

We confirm that this report is to the best of our knowledge, a fair and accurate reflection of the views submitted to us as part of the stakeholder engagement activities undertaken with members.

Due to the limitations imposed on us by the timeline of the consultation, we acknowledge that this report is not as comprehensive as it would have been had the circumstances been otherwise and may include some formatting or grammatical errors.

Correction

At the time of writing it was stated that NRCPD had no employees with vocationally relevant training. We acknowledge that this was an error and the Practice Policy Officer at the time was in fact a qualified RSLI.

SCOPE OF THE CONSULTATION

NUBSLI have responded to the NRCPD's consultation in-line with the request below.

*"We would be grateful if comments submitted as part of the consultation remain relevant to the improvement and finalisation of the revised procedure and Code of Conduct. We would welcome comment on any aspect of the procedure, such as sanctions, decision-making, timelines, and appeals. We are also interested in constructive feedback on how best to present the documents for publication (both the BSL and English versions). We are using the format that you see, but any feedback on how to improve it is welcome."*¹

This report has been produced on the understanding that the preliminary work undertaken to revise the NRCPD's complaints procedure was completed during the 18 months prior to this consultation and the resulting efforts have led to substantial amendments to the complaint's procedure, with the aim of falling in-line with comparable regulatory procedures elsewhere. Works on the Code of Conduct have been less involved and without fundamental review, it will remain broadly the same apart from the addition of two new adjustments.

CONSULTATION START DATE: 15th July 2022

CONSULTATION END DATE: 12th September 2022

¹ <https://www.nrcpd.org.uk/documents/consultation/Guide%20to%20Consultation.pdf>

PROFESSIONAL CONTEXT

The National Registers of Communication Professionals working with Deaf and Deafblind People (NRCPD) are a national voluntary regulator of over 1,700 language service professionals.

Registration figures

	Electronic Notetaker	Deafblind Interpreter	Lipspeaker	Manual Notetaker	Sign Language Interpreter	Sign Language Translator	Speech to Text Reporter	Regulated Trainee Sign Language Interpreter	Regulated Trainee Sign Language Translator
Channel Islands									
East Midlands	1		1		108			16	2
East of England		2	5		128	2	9	20	2
Ireland					1		1		
Isle of Man					1				
London	1		10	1	185	6	4	44	6
North East			1		43	1		5	
North West		2	8		160		7	41	3
Northern Ireland					35	2	2	2	
Scotland	2	2	1	1	97	1		13	
South East	1	1	14	1	191	6	2	34	
South West	1		4		123	3	4	13	1
Wales					55	5	2	7	
West Midlands	2	3	2		161	2		40	3
Yorkshire and The Humber			1		75	1	2	17	2
Totals	8	10	47	3	1363	29	33	252	19

The total includes dual registrations (ie one person on more than one register)

<https://www.nrcpd.org.uk/registration-figures>

The Board of Trustees are legally responsible for the governance of the NRCPD.
Marcus Hawthorn is the Chief Executive and Registrar.

The NRCPD do not have the powers of a statutory regulator, although it does remain as one of their long-term goals.

“Statutory regulation of communication and language professionals will make it illegal for someone who isn't registered to practise. It will further raise standards and increase public protection.”²

A significant number of registrants currently work on a self-employed basis, either as sole traders or companies limited by guarantee.

Registration is voluntary, which means language service professionals have a choice about who they wish to be regulated by and opt-in to regulation based on their personal preference. Language service professionals are not required by law to submit to regulation and as such, may choose not to.

The most recent set of (unaudited) **NRCPD accounts**³ available on the Companies House website relates to the year ending 31 December 2021. At the time, they stated that there were 1667 registrants. The majority of the NRCPD's income came from registration fees, which was recorded as totaling £359,952. We do not know how much expenditure is directly related to complaints related activities.

As far as we are aware, no one employed by the NRCPD has any vocationally based knowledge or experience relevant to the language service professionals that they regulate.

² <https://www.nrcpd.org.uk/statutory-regulation>

³ <https://find-and-update.company-information.service.gov.uk/company/10510695/filing-history>

At this point, it would be remiss not to mention the NRCPD's involvement in the campaigning for the British Sign Language Bill, which received Royal Assent on 28th April 2022. Having now passed into law, there will be renewed interest in ensuring that the government is able to meet their prior commitments, which include *'Increasing the number of registered interpreters'*.⁴

METHODOLOGY

NUBSLI members were invited to a meeting, which was held remotely via Zoom on August 17th 2022. The meeting was minuted and these were used to inform the online survey questions, which was sent out to members on the 6th September 2022.

When reviewing the results from both the meeting and the survey, we found that the majority of feedback aligned to at least one of the following four themes:

- 1) CONSULTATION TIMELINE AND PROCESS
- 2) THE 2022 'FITNESS TO PRACTICE' PROCEDURE
- 3) THE REVISED CODE OF CONDUCT
- 4) POLICY AND PROCEDURAL ISSUES

SUMMARY OF KEY FINDINGS

Review and revision of the Code of Conduct and current Complaints Procedure has been welcomed by NUBSLI and its membership, with the majority keen to support any consultation which would contribute to strengthening professional regulation.

⁴ <https://bda.org.uk/bsl-act-now/>

1. CONSULTATION TIMELINE & PROCESS

Within the consultation documents, the NRCPD state that "*Development of the revised procedure and adjusted Code began in 2019, but unfortunately suffered significant delay over the Covid pandemic. The documents we are presenting for consultation have been developed over the last eighteen months following feedback and insight from many sources. We consulted with all professional associations and key Deaf-led charities for feedback on our 2015 Complaints Process, and how it had been working.*" Whilst we do not dispute this, the majority of NUBSLI members engaging with the current consultation process were doing so for the first time, unaware of any prior consultation efforts.

The NUBSLI Working Group disseminated the new Fitness to Practice procedure amongst members and 77.36% of respondents confirmed that they had read the documents. Of those who had not read the documents, the primary reason cited related to the timing of the consultation, with its release during the school holiday creating a substantial barrier to engagement. To a lesser degree, there were also issues with accessing the documents due to the density of the text, difficulty locating them on the website or the language used.

NUBSLI did not aggregate the survey data, but we draw your attention to the 2021 **Census**⁵ report commissioned by ASLI, which shows clearly that we are a female dominated profession, with approximately 84%-86% of interpreters and translators identifying as female. In 2016, the **Office for National Statistics**⁶ released data showing the disparity in unpaid labour between men and women. The research showed that across every age group, women carry out 60% more unpaid labour than men. Furthermore, women disproportionately shouldered the care responsibilities for children. Within this context, we would anticipate the burden of unpaid labour to be compounded for women during the summer holiday.

⁵ https://pure.hw.ac.uk/ws/portalfiles/portal/51187413/Census_Project_report_Final_August2021.pdf

⁶

<https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/earningsandworkinghours/articles/womenshouldert heresponsibilityofunpaidwork/2016-11-10>

Feedback from members, when combined with the statistics above, suggest that the timing of the NRCPD's consultation processes may have put women at a substantial disadvantage, adversely affecting their ability to fully engage with the consultation process and limiting their professional opportunities. NUBSLI did raise concerns about the timing of the process at the start and after an initial refusal, we were pleased to see the NRCPD extend the deadline.

There was a sense amongst members that the consultation and Fitness to Practice document had appeared out of thin air. Many felt that stakeholders were being asked to comment on quite a fundamental review, without any context supplied in relation to the history of how the revised document had evolved. This had resulted in some questioning the integrity of the consultation process, as well as regret that a meaningful opportunity for registrants and deaf stakeholders to co-produce the document had been missed.

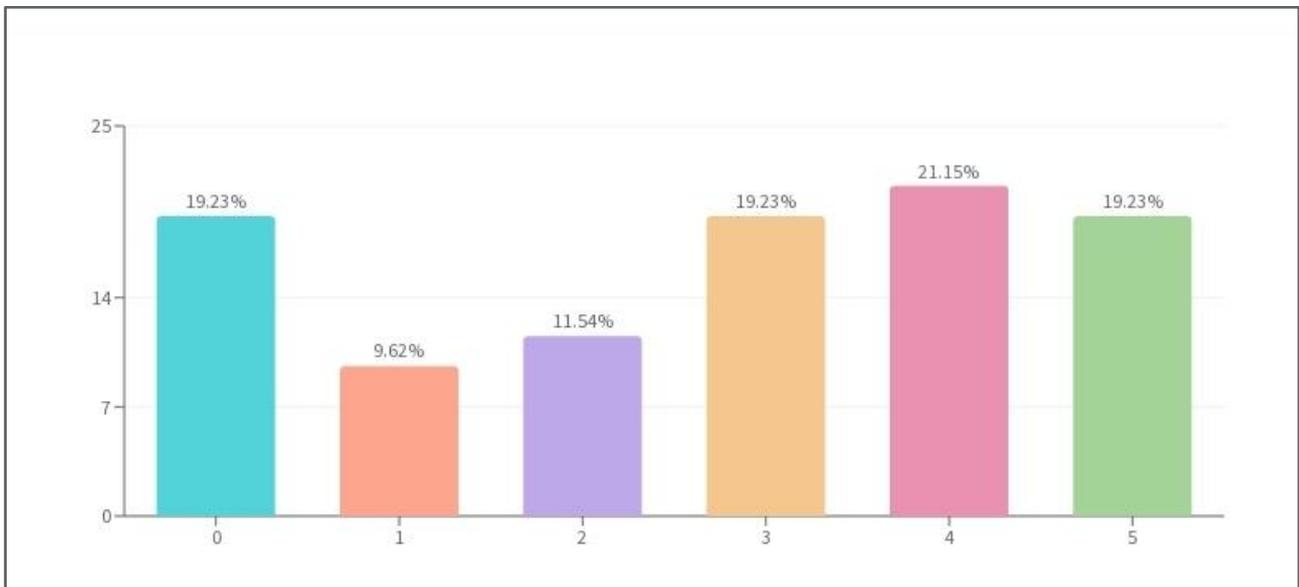
The framing of stakeholder engagement as a consultation has been perceived by some members as misleading. Consultation implies that there has been a period of deliberation, where advice is sought prior to any decisions being made. Yet, the NRCPD's statement within the consultation guide suggests otherwise.

"We would be grateful if comments submitted as part of the consultation remain relevant to the improvement and finalisation of the revised procedure and Code of Conduct."

Whilst they do go on to say that they welcome comment on any aspect of the procedure, the inference is that the current version of the proposed Fitness to Practice procedure is the final draft before approval and implementation.

Members who responded to the online survey were asked their opinion on the following question:

'Do you feel like registrants have had sufficient opportunity to contribute and/or co-produce the new document?'

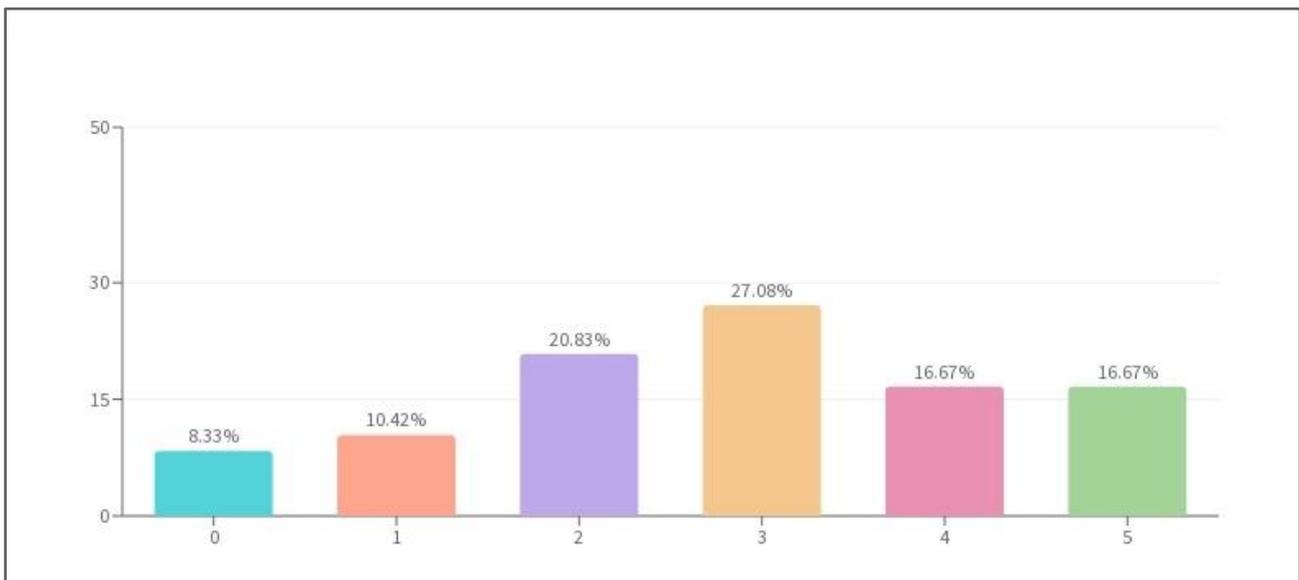


The opinion scale rated from 0 (yes) to 5 (no)

2. THE 2022 'FITNESS TO PRACTICE' PROCEDURE

Members who responded to the online survey were asked their opinion on the following question:

'Do you think 'Fitness to Practice' is an accurate reflection of the document's function?'



The opinion scale rated from 0 (yes) to 5 (no)

Following this question, we invited members to share their thoughts on the proposed changes and the answers received mirrored many of the themes that had been identified within the online meeting previously. Whilst several respondents did see the change as a positive step forward, with one saying that they felt that the change in title was *"clear, professional and supportive."*, others remained unclear on the intent behind the revision. Several replies argued that the document was still a complaints procedure despite the name change and if approved, it would be confusing to the public should they wish to raise a complaint or a concern. Additionally, it was felt that 'Fitness to Practice' was more indicative of how Human Resources might look to manage an employee who had been on long term sick leave. Whilst there are advantages to recognising that a registrant's

practice could be temporarily compromised because of health reasons unrelated to their general competence as a practitioner, there is also a risk of the NRCPD adopting a 'medical model' mentality. The risk with assessing a registrants 'fitness to practice' through a deficit-based lens is that it could eventually result in discrimination.

In summary, most people found the terminology incongruent and confusing, best summarised in the responses below.

One member felt that the document had tried to encompass too many intersecting factors.

"I think they are trying to cover too much under one document. Fitness to practice is not necessarily the same thing as 'competent' to practice. Competence is what sits behind the opportunity to be on the register (minimum level) and the CPD programme (increasing on competence). Fitness to practice might be a matter of competence but equally it could apply to a short term period of not being fit to practice due to other extenuating factors, which has not been properly considered."

Another member raised a point about the ambiguity of the language.

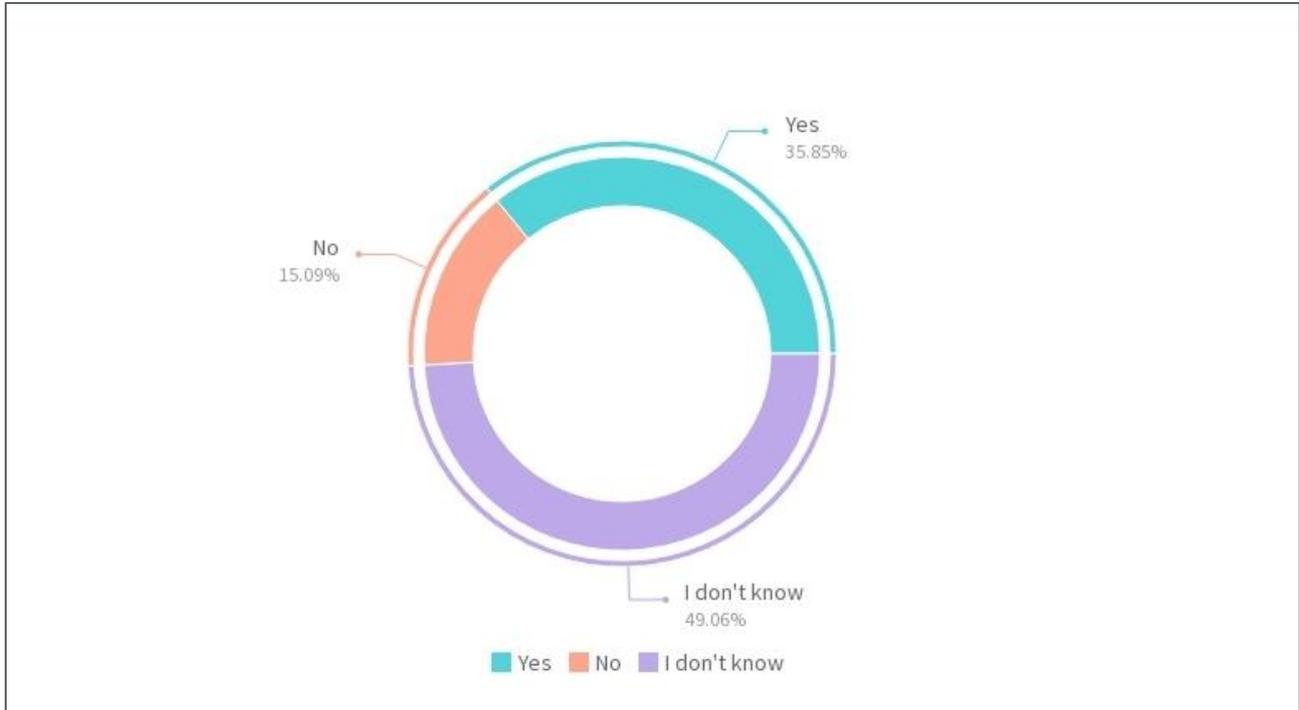
"Fitness to practice and complaints are two different things that don't necessarily overlap - an interpreter could be fit to practice and still have a complaint that is found to be upheld."

Broadly speaking, there was a relatively even split between respondents who either did, or did not, consider the language of the document sufficiently accessible for professionals and the public. Some raised concerns about how 'Fitness to Practice' would be interpreted by the Deaf community, compared to a 'Complaints Procedure' which felt less abstract.

Focusing on the procedural changes laid out within the document, 60.38% of members supported the timescale of misconduct reports being raised within six months of the incident. Where concerns were raised in opposition, they most often related to the circumstances of the complainant, supposing ill-health or other extenuating factors which might delay contact with the NRCPD.

Continued discussions looked at the changes to sanctions which could be applied. Within the survey we asked the following question:

'Are the proposed sanctions sufficient to "protect d/Deaf and deafblind people and maintain public confidence in language services across the UK" in line with the NRCPD's mission statement?'*



The majority of respondents (49.06%) replied to say that they didn't know. With the benefit of hindsight, it would have been useful to have included a further question, which explored people's reasoning. It is entirely possible that people may have ticked 'I don't know' because they did not feel informed enough about the NRCPD's mission statement or the remit of its powers when allocating sanctions. This can be supported by comments made both in the meeting and within the survey. One survey respondent said:

“I think the sanctions that NRCPD can impose are restricted by the fact that we are not a regulated profession.”

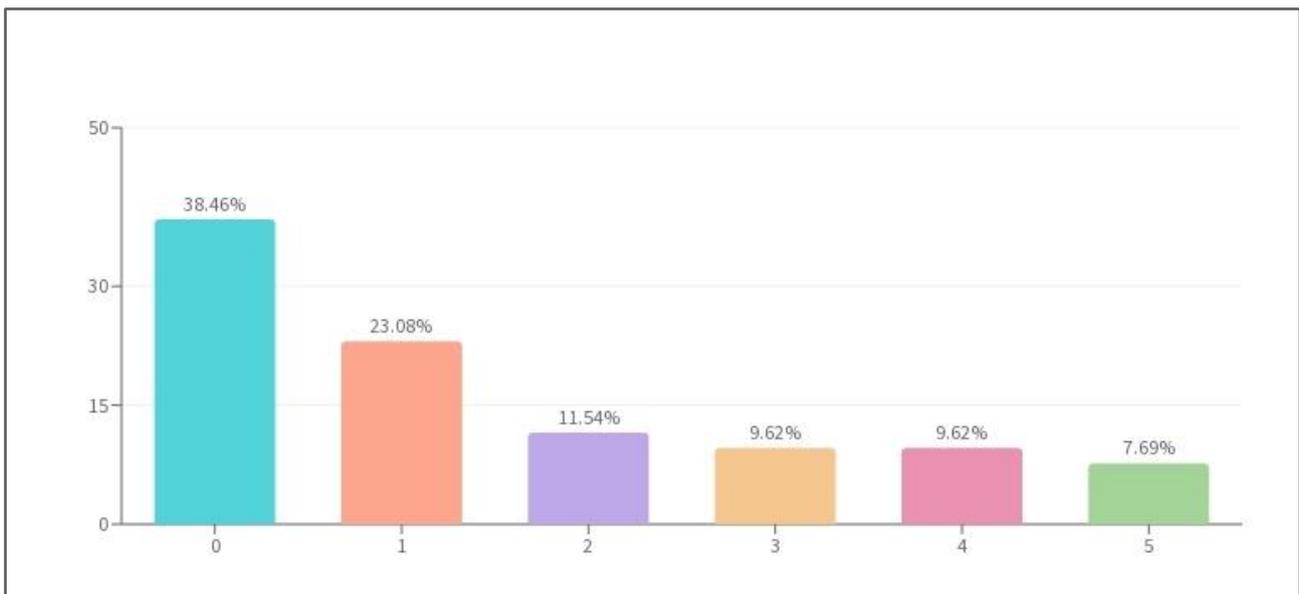
Which leaves registrants and the public unclear: Are the sanctions restricted because without statutory powers, the NRCPD are limited by civil law on what they can do? Yet, without more robust sanctions, will the NRCPD struggle to achieve statutory regulator status?

3. THE REVISED CODE OF CONDUCT

The revisions made to the Code of Conduct were debated at length within the meeting and based on those discussions, we formed two opinion-based questions for the survey.

The first looked at the NRCPD codifying their position on unprofessional conduct involving, bullying, harassment and discrimination.

‘There are two new additions to the Code of Conduct. The first is the following about bullying and harassment: "6.5. You must treat your fellow language service colleagues fairly and with respect. You must not bully or harass them or discriminate unfairly against them. You should respectfully challenge behaviour that does not meet this standard." Do you think that this is a useful addition to the Code of Conduct?’



The opinion scale rated from 0 (yes) to 5 (no)

Without question, this was overwhelmingly seen as a useful and welcomed addition to the Code of Conduct. Following this question, we asked members to briefly share their thoughts behind their decision and in contrast to the opinion scale which showed positive support for its inclusion, a few cautionary themes emerged in their rationale.

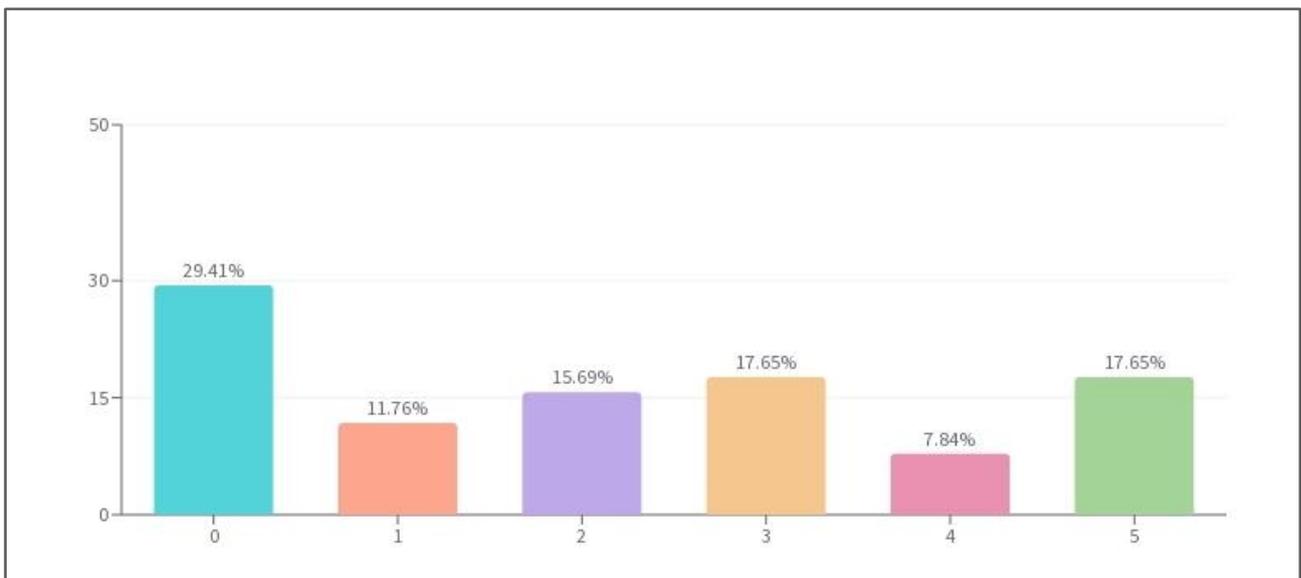
Issues related to Horizontal Violence or bullying by colleagues were the most commonly occurring reasons to support its inclusion. Some found the addition reassuring, assuming that it would act as a deterrent which would force colleagues to preemptively question their own behaviours more closely. Others hoped that it would be a helpful way to protect themselves when challenging colleagues, if it's in the Code of Conduct then challenge can be viewed through a lens of professional conduct and not interpersonal differences.

Many comments also related to the ambiguity of the wording. Some of the wording felt loaded, with interpretation of phrases such as '*respectfully challenge*' being highly subjective. Others were uncomfortable locating bullying, harassment, and discrimination under the same heading because two of those are criminal offences and claims of discrimination and harassment would be better dealt with by the police, not determined by Case Examiners who are underqualified to make a legal judgement. Other respondents stated that they would need to see case studies of how this would be implemented in practice. For example, how will the NRCPD determine the line between what is considered professional disagreement and what would be defined as bullying. If what the NRCPD are attempting to incorporate is a way to identify unwanted professional behaviours and assess the degree of harm experienced by the complainant, then using the terms interchangeably is not helpful and may lead to an increase in vexatious or malicious claims following feedback which felt more challenging than expected.

Expanding the Code of Conduct to explicitly state that bullying, harassment, and discrimination have no place within the regulated professions is a vital addition, but it is clear from the feedback we have received that many do not feel that it is enforceable in its current format.

The second survey question asked members to share their opinion on whether the NRCPD should broaden the remit of the Code of Conduct, so that it applied to any registrant whether they were working in an assignment or undertaking any practice related activities. The question asked was as follows:

‘There are two additions to the Code of Conduct. The second is about where the Code should be applied: "when you are practicing or involved in practice related activities, including training, professional events, or otherwise represent yourself as a professional registered with NRCPD, including in online spaces." Do you think that this is a useful addition to the Code of Conduct?’



The opinion scale rated from 0 (yes) to 5 (no)

The results for this question were less clear-cut. There were more definitive 'yes' responses overall, with 29.41% of respondents supporting its inclusion. However, we noted quite significant variation across the rest of the scale, which could suggest that the remaining respondents felt more cautious about what its inclusion might mean. The follow up question asked respondents to share their related thoughts and the main concerns were regarding the potential application of this aspect of the Code.

There was a general assumption that the rationale for adding this to the Code of Conduct was to manage the behaviours of registrants when engaging with CPD or social media. Variations of

'profession' or 'professional' were used on no less than 19 occasions, which highlights the value people had placed upon the public perception of their professional role.

For those who saw the addition as a positive thing, it was seen to offer a layer of protection against the "*keyboard warriors*" who reflect badly on the profession. Not everyone agreed and there were a significant number of comments which challenged the semantics of the wording.

One respondent asked:

"I represent myself at all times and so, I am expected to follow the code at ALL times?"

Another commented to say:

“I don't represent the NRCPD when in those spaces. I opt in to regulation whilst interpreting only. I would not register with the NRCPD if they expanded the remit so that it included literally every other non-interpreting space.”

Another respondent expressed skepticism at the underlying intent of this addition:

“Our work is based on trust and advocacy. We need to be aware of that when not ‘on the job’. But is this being added so that people can't speak out against NRCPD and [REDACTED] on Twitter? Again, very subjective.”

4. POLICY AND PROCEDURAL ISSUES

NUBSLI recognises that the NRCPD are working towards statutory regulation and as such, their focus is on protecting the public through raising professional standards. The NRCPD hold and promote a voluntary Register of communication and language professionals; this means that registrant's consent to regulation when they renew their registration and in doing so, agree to abide by the Code of Conduct.

NUBSLI members discussed, at length, concerns around the NRCPD's remit and powers as a regulator. Some members felt that if the primary aim was to ensure that the public are protected, then having a clearly titled 'Complaints Procedure' offered a structured way for someone to raise their concerns and highlight practice which had fallen short of the expected standards.

There was some confusion regarding the NRCPD's approach to regulation, with members suggesting that the NRCPD appeared averse to sanctions and punitive measures, doing little to protect the public from poor practice. This intersected with conversations around the difficulty in regulating complaints which had already been raised with the police, with 86.54% of survey respondents saying that they would expect the NRCPD to investigate a complaint, irrelevant to its reporting elsewhere. It was felt that the NRCPD had a duty to protect the public from harm in the interim, with concerns shared around the prospect of someone continuing to work, despite a serious allegation having been made.

With regards to the processing of complaints, NUBSLI members raised a number of concerns about the lack of formal training received by Case Examiners, as well as an absence of any regular standardisation work taking place. NUBSLI are concerned that without any formal training undertaken by the Case Examiners, there is no assurance for registrants or the public that those tasked with assessing complaints are able form an informed conclusion based on the balance of probabilities.

One member responded to say:

"If they haven't received any training, it isn't professional judgement, it is a personal judgement. There is no place for a personal judgement in this context."

Another respondent said:

"As it is a legal standard being held to (as stated in the consultation meetings) and they are actively avoiding undue punitive measures, there should be a legal basis for decisions, hence, training in legal matters and complaints law."

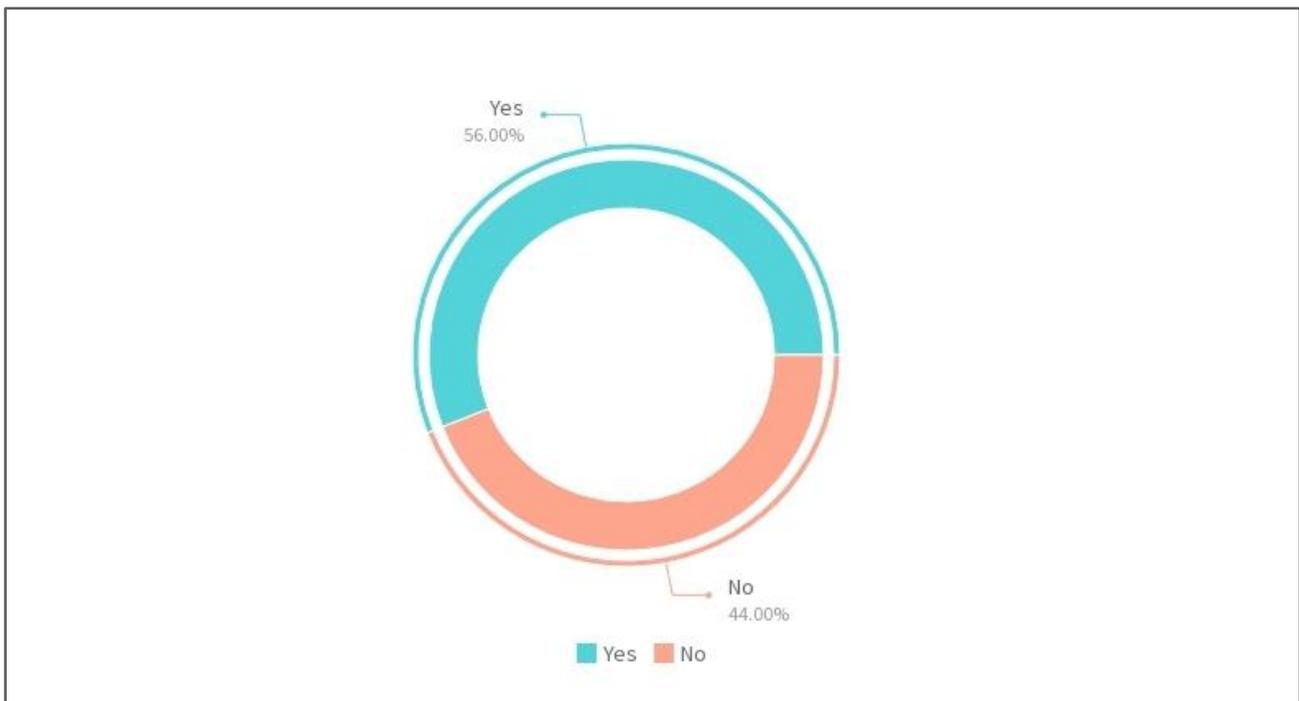
The concerns raised above are of vital importance, especially in light of ongoing concerns around 'Register-Hopping' where registrants who have received formal sanctions for misconduct apply to join an alternate register. The risk is that Case Examiners not being able to evidence appropriate training and due process, actively works to undermine the NRCPD's efforts towards statutory regulation because the other regulatory bodies may not be able to trust that the interpretation of the Code of Conduct or the Fitness to Practice procedure will have been applied equitably.

What became apparent during the online meeting was that members' interpretation of the Fitness to Practice procedure varied considerably, especially when discussing legal concepts such as 'balance of probabilities', 'the evidence threshold' and 'the public interest test'. Which lends weight to the point above; if the Case Examiner pool is formed of registrants, allied professionals and lay people who have not received any standardised training, placing them in the position of analysing evidence and judging a registrants 'fitness to practice' is unsafe and leaves the NRCPD open to challenge.

Within the meeting there was some debate about whether all complaints raised with the NRCPD should be made public, either named or anonymised. No consensus was achieved.

The arguments for publication centred around prioritising public protection over reputational risks by keeping the public informed of any practice concerns, even if that complaint had not been pursued or upheld. Those who argued against the publication felt that a registrant had the right to be seen as innocent, until proven otherwise. If the NRCPD decided that there was no complaint to answer, then the registrant was entitled to maintain their privacy. Within the membership survey, we posed the following question:

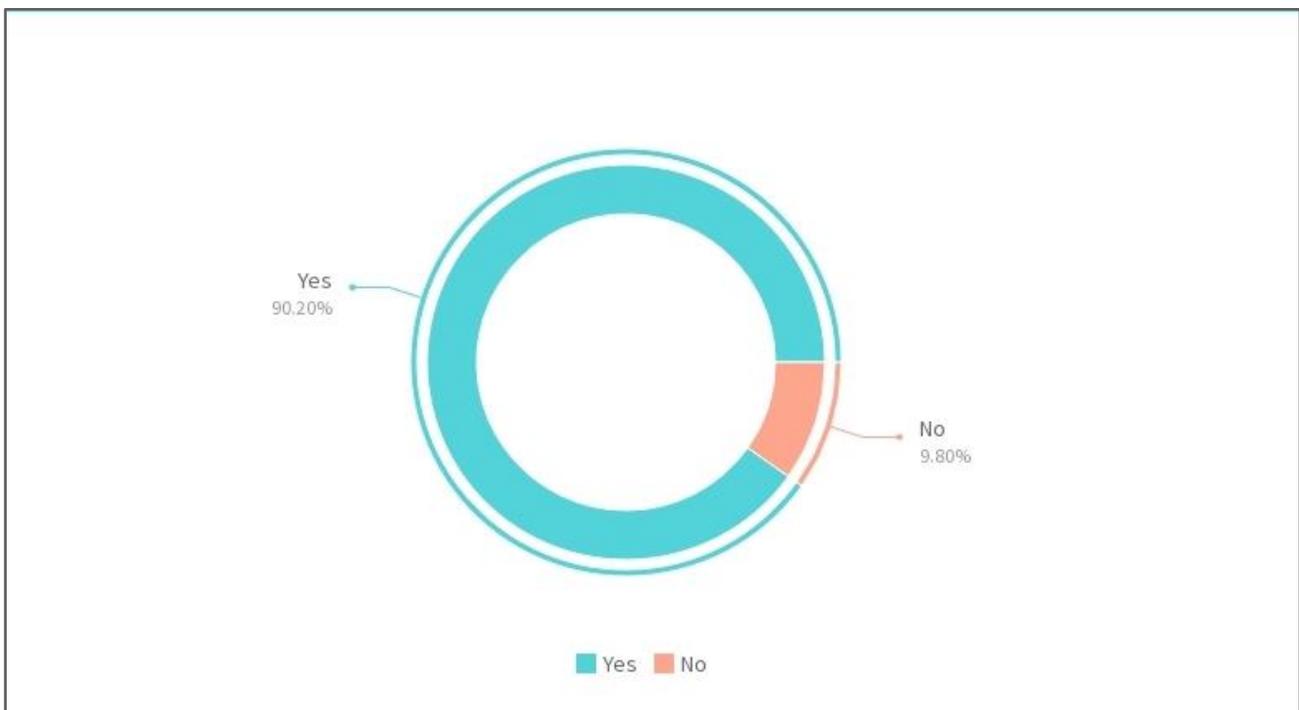
‘Should an anonymised summary of each complaint/misconduct report be made public, even if it has not been upheld?’



The question remained just as polarising in the survey, with only a marginal difference between those in favour and those against. This topic would benefit from further exploration by the NRCPD, mapping how the publication of complaints is managed by other regulators.

A survey question which received a more unanimous response was:

'If the NRCPD decide not to investigate a complaint, should they be required to provide a rationale and/or risk assessment in order to justify why it is not (in their opinion) in the public interest to pursue?'



90.20% of respondents confirmed that they did think that the NRCPD should make available a rationale explaining how and why they have made the decision not to pursue a complaint. Within the meeting, NUBSLI members discussed the potential for the NRCPD to keep a risk register of complaints and concerns, so that they can evidence a pattern of behaviours which determine how much of a risk to the public a registrant may be in future, despite the NRCPD determining that a complaint is not in the public interest or that there is no case to answer.

If the NRCPD truly wishes to foster trust between themselves, registrants, and the public, it must be transparent and accountable for its decisions. If the NRCPD are seen to present an organizational culture which is perceived as ‘pay no attention to the man behind the curtain’, it will do little to nurture that trust. Moreover, if people feel marginalised and disempowered, it could result in people challenging the NRCPD in more visibly public ways, such as utilising social media to collectively leverage change.

RECOMMENDATIONS

Following consultations with its members, NUBSLI makes the following recommendations

- NUBSLI recommends that the proposed changes to both the Fitness to Practice procedure and the Code of Conduct are not approved or implemented in their current format
- Our findings highlight the need for more substantial work to take place before registrants feel confident enough to buy-in to the proposals. As such, NUBSLI strongly recommend that the NRCPD do not simply paper over the cracks in the current Complaints Procedure and instead recognise that there are substantial benefits in devoting their efforts towards a more meaningful consultation with stakeholders - especially those represented by organisations with whom NRCPD has Memoranda of Understanding - prioritising both the Code of Conduct and the Complaints Procedure
- The NRCPD to undertake a substantial review of their 'evidence threshold' and acknowledge that it has been historically difficult to prove misconduct if based solely on the 'evidence threshold' without a more thorough investigation, including an interview with related parties. Furthermore the sharing of unredacted statements between complainants and professionals under investigation creates huge potential for corruption of evidence and does not embrace the principles of restorative justice.

- The general confusion and polarising opinion regarding the proposed Fitness to Practice procedure shows that it is not an adequate replacement for the current Complaints procedure. We recommend that the NRCPD review the purpose of each document and work to distinguish between issues relating to a registrant's competency, compared to their conduct. This should not be work that NRCPD does alone. An independent executive should facilitate this work, which we recommend being completed with a broad and representative consensus of all stakeholders, including the public
- As a matter of urgency, any active Case Examiner must not be allowed to assess complaints until they have received adequate training to ensure that there is a standardised approach to the assessing of complaints. At minimum, this should include:
 - 1) A collective understanding of all relevant terminology and applied tests of the law
 - 2) A clear distinction between what is covered by the NRCPD's civil remit and when an incident should be referred to the authorities
 - 3) Training on unconscious bias and Equality, Diversity & Inclusion to ensure that sanctions are applied consistently to alleged offences and breaches of the Code
- All new Case Examiners must receive the training at the point of entry
- All Case Examiners be required to periodically undertake refresher training
- All complaints assessed by Case Examiners must include a minimum of three individuals as standard. One of those Examiners must be a practicing interpreter/translator, and at least one of those Examiners must be a Deaf person

- The NRCPD proactively seek to diversify their pool of Case Examiners so that registrants and the public have some assurance that those who have the power to make decisions about their professional practice are representative of wider society
- The NRCPD establishes a generic 'feedback' process so that the public can comment on a registrant's practice without being required to substantiate their concerns with evidence. This would not need to form the basis of a complaint or concern, but would be logged so that the NRCPD are able to create a picture of a registrant's practice
- Any sanctions given must be made a mandatory requirement of registration and not just a recommendation
- Registrants who have been sanctioned with either a time-limited practice restriction or suspension following a complaint of misconduct, should be required to undertake a formal 'Fitness to Practice' assessment prior to any application to rejoin being considered
- Sanctions should be applied on a sliding scale, proportionate to the seriousness of the misconduct. They should not be imposed on an 'all or nothing' basis. To this end, we recommend NRCPD publish a tariff of sanctions and applicable penalties that is independently reviewed on a regular basis
- If a complaint is raised which suggests that the registrant may pose a continued risk to the public, they should be suspended immediately pending investigation
- Any complaint where the NRCPD decide that there is 'no case to answer', or determine that there is insufficient evidence, must also be risk assessed by the NRCPD and that decision logged alongside any record of the complaint

- The NRCPD recognise that the labour involved in raising concerns or complaints disproportionately burdens deaf members of the public. To redress this imbalance, NUBSLI recommends that the NRCPD employ an advocate, support worker or liaison officer who is able to guide deaf members of the public through the complaints process, if needed
- The NRCPD to pursue a Memorandum of Understanding (or equivalent) with other regulatory bodies so that registrants who are suspended from one are prevented from joining another