



The Potential Application of ECHR Case-law Guidance on the Communication with Third- Country Nationals

Potenciálne uplatnenie usmernení judikatúry EDĽP o komunikácii so štátnymi príslušníkmi tretích krajín

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Abstract:

The primary objective of this scientific study is to analyze the present state of communication in detention facilities across the EU Member States and also contribute to the analysis of legislation pertaining to mutual verbal and nonverbal communication between detained third-country nationals and police officers within detention facilities in selected EU countries. This will have a significant impact on the prevention of misunderstandings and conflicts in the above-mentioned facilities, especially in regard to the protection of human rights and fundamental freedoms of the detained foreigners. [1]

Keywords: *intercultural communication, EU, legal framework, human rights and fundamental freedoms, procedural guarantees, language assistance, detention facility, police, third-country nationals*

Abstrakt:

Primárnym cieľom tejto vedeckej štúdie je analyzovať súčasný stav komunikácie v útvaroch zaistenia v členských štátoch EÚ a zároveň prispieť k analýze legislatívy týkajúcej sa vzájomnej verbálnej a neverbálnej komunikácie medzi zaistenými štátnymi príslušníkmi tretích krajín a príslušníkmi polície v útvaroch zaistenia vo vybraných krajinách EÚ. To bude mať významný vplyv na predchádzanie nedorozumeniam a konfliktom v uvedených zariadeniach, najmä v oblasti ochrany ľudských práv a základných slobôd zaistených cudzincov.

Kľúčové slová: *medzikultúrna komunikácia, EÚ, právny rámec, ľudské práva a základné slobody, procesné záruky, jazyková pomoc, detenčné zariadenie, polícia, štátni príslušníci tretích krajín*



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Methodology: An analysis and comparison of the respective legislative frameworks of selected EU countries and the European Court of Human Rights case-law related to the violation of Article 5(2) regarding the right to language assistance.

Findings: The analysis of the respective legislative documents within the selected EU countries revealed differences in the interpretation and implementation of the right to language assistance, which is guaranteed as one of the procedural safeguards in the context of protection of human rights and fundamental freedoms. The disparate interpretation and implementation of the right to language assistance hinders effective communication between police officers and third-country nationals detained in detention facilities, resulting in frustration on both sides, particularly during times of migration crises, when effective communication serves as a crucial tool in preventing misunderstandings and conflicts. A list of common characteristics encountered across EU countries was compiled. The analysis of the case law of the European Court of Human Rights revealed that there are still concerns regarding the provision of language assistance, resulting in unnecessarily burdensome complications for the EU nations and affecting the human rights of individuals from third countries who are detained in detention facilities. [2]

Value:

The significance of the study lies in the provision of a comprehensive overview of the remaining challenges encountered by both police officers representing the respective EU countries and third-country nationals arriving in the EU territory and being detained in detention facilities. These challenges arise from divergent interpretation and implementation of one of the fundamental human rights, namely the right to language assistance, which is guaranteed as a procedural safeguard at the international and European levels, as well as at the national level of the respective EU countries. Through a detailed analysis of the core legal documents and the European Court of Human Rights case law, attention is drawn to the legal consequences for the EU Member States. To avoid negative consequences, the areas of required amendments are highlighted.

Introductory Remarks

Migration remains a highly debated topic, as not only does the ongoing conflict in Ukraine have an impact on the global environment, resulting in an increase in the number of third-country nationals illegally entering the EU borders. Furthermore, the effects of migration have a direct impact on the legislation, cultural, and political climate of the respective Member States. Different Member States are approaching migration in accordance with their respective national legislative frameworks and diverse cultural backgrounds, with the aim of effectively addressing the migration crisis. In general, migration is perceived in a negative sense mostly in the countries that are affected by the migration flows the most. The negative feeling, however, is still present across the EU countries as they need to tackle the challenges associated with the migration and the illegal border crossings. For example, in Slovakia the illegal border crossings are rising even though Slovakia remains one of the so-called transit countries (see Table 1).

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Table 1 Overview of illegal border crossings for the years of 2016, 2017, 2018, 2019, 2020, 2021, 2022, 2023 a 2024.

	Spolu	I.	II.	III.	IV.	V.	VI.	VII.	VIII.	IX.	X.	XI.	XII.
2016	208	7	14	19	10	16	14	25	46	19	4	21	14
2017	248	10	9	10	13	8	21	21	74	29	29	24	0
2018	348	19	6	5	14	67	30	47	25	29	33	59	14
2019	213	9	6	8	11	40	20	35	19	11	38	7	9
2020	135	2	11	21	2	11	3	29	20	17	9	4	6
2021	210	2	8	6	5	25	15	23	40	23	28	27	8
2022	549	12	23	158	29	27	27	45	33	38	36	61	60
2023	678	52	42	52	32	37	33	77	59	102	86	54	52
2024	1532	47	47	106	151	233	290	337	218	103	-	-	-

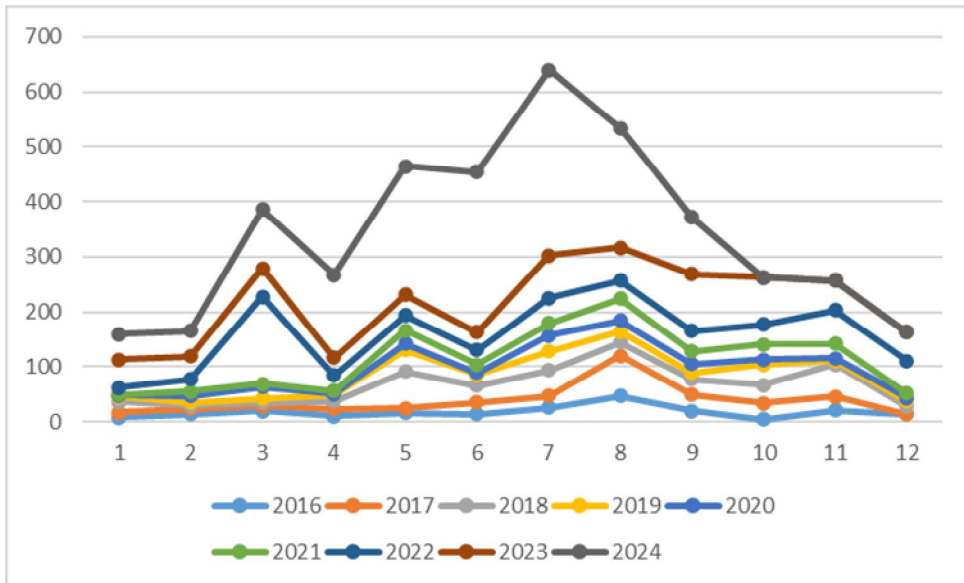
Source: Summarized by the author. Based on the Annual review of the Bureau of Foreign and Border Police of the Presidium of the Police Force. [3]

The development of the numbers in illegal border crossings is graphically displayed in Graph 1. The rise in illegal border crossings was recorded for the following years: 2017, 2018, 2021 and exponentially in 2022, 2023 a 2024 (when compared with the previous years). The decreasing tendency was recorded only in years 2019 and 2020. The lower number of illegal border crossings can be attributed to the restrictions that were in place during the COVID period as the measures implemented across the globe restricted the mobility of people, and in overall view, also affected the numbers of border crossings both legal and illegal. On the contrary, the disproportionate increase in the number of foreigners who crossed the state border of the Slovak Republic illegally was most likely caused by the war conflict in Ukraine. The above assumption is confirmed by statistical data obtained from individual annual reviews of the Bureau of Foreign and Border Police of the Presidium of the Police Force and also by statistics provided for the purposes of the present scientific study (especially for the period 2023 and 2024) by the Risk Analysis and Statistics Division of the Risk Analysis and Coordination Department of the Bureau of Foreign and Border Police of the Presidium of the Police Force which registers Ukrainian nationality as the most numerous among incoming foreigners in the given period (see Graph 1 for more details). However, in the period 2022, 2023 and 2024, citizens of other countries also illegally crossed the state border of the Slovak Republic, with the most numerous groups being citizens of Vietnam, Turkey, Bangladesh, India, Afghanistan, Pakistan, Russia, Syria, Iran, Georgia, Moldova and the Czech Republic. However, the ten most frequent nationalities also included citizens of Somalia, Azerbaijan, Libya, and Sri Lanka. At this point, it is also necessary to point out that the statistical overview of irregular migration for the year 2024 is available at the time of compilation of the present scientific study in a limited scope, namely for the period of months until September 2024. However, from the publicly available data provided by the Bureau of Foreign and Border Police of the Presidium of the Police Force, it is clear that in terms of the nationalities of incoming foreigners, in 2023 there was a significant decrease in the number of citizens of Ukrainian nationality illegally entering the territory of the Slovak Republic. In 2023, the most numerous groups

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crossing the Slovak border illegally included citizens of Syria, Morocco, Tunisia, Turkey, Afghanistan, Ukraine, Bangladesh, India, Pakistan, Algeria, Iraq, Yemen, Serbia, Georgia, Nepal, and Palestine. However, a similar trend is no longer present in 2024, where the largest group illegally crossing the state borders of the Slovak Republic was once again made up primarily of citizens of Ukrainian nationality.

Graph 1 Overview of illegal border crossings for the years of 2016, 2017, 2018, 2019, 2020, 2021, 2022, 2023 a 2024.



Source: Summarized by the author. Based on the Annual review of the Bureau of Foreign and Border Police of the Presidium of the Police Force. [4]

In order to achieve this objective, the EU has adopted several legal instruments that have since been transposed into the national legislation of respective EU Member States. By implementing this approach, a unified framework was established to address migration and its repercussions.

The European Legal Framework for the Communication with Third-Country Nationals

The primary objective of the common framework for all EU member states is to address current concerns pertaining to the presence of third-country nationals within the territory of the Member States and the establishment of guidelines for communication with them. In order to ensure respect for human rights and freedoms, the EU has reflected Member States efforts to improve the return management of illegally staying third-country nationals in all its dimensions, with a view to lasting, fair, and effective implementation of common standards.

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In case of detention of third-country nationals in detention facilities, in accordance with Article 5 (2) of the European Convention on Human Rights (ECHR) [5], "anyone arrested shall be informed without delay and in a language he understands of the reasons for his arrest and of any charge against him".[6] It is essential that the Member State provide an interpreter to ensure a uniform procedure, whereby the third-country national is able to comprehend and communicate in the interpreted language throughout all procedural proceedings. The legal regulations concerning standards and procedures in the field of communication with third-country nationals are governed by common European legislation in all EU Member States. In practice, however, the legislation in question is implemented in accordance with specific conditions in distinct nations. [7]

The guidelines for official communication with the respective authorities are comprised of the subsequent documents:

- Directive 2013/32/EU of the European Parliament and of the Council of 26 June 2013 on common procedures for granting and withdrawing international protection;
- Directive 2008/115/EC of the European Parliament and of the Council of 16 December 2008 on common standards and procedures in Member States for returning illegally staying third-country nationals;
- Directive 2010/64/EU of the European Parliament and of the Council of 20 October 2010 on the right to interpretation and translation in criminal proceedings;
- Regulation (EU) No 182/2011 of the European Parliament and of the Council 439/2010 of 19 May 2010 establishing a European Asylum Support Office;
- Regulation (EU) No 182/2011 of the European Parliament and of the Council Regulation (EC) No 640/2013 of 26 June 2013 establishing the criteria and mechanisms for determining the Member State responsible for examining an application for international protection lodged in one of the Member States by a third-country national or a stateless person;
- Commission Recommendation (EU) 2017/432 of 7 March 2017 on ensuring more effective returns in the implementation of Directive 2008/115/EC;
- Commission Recommendation of 1 October 2015 establishing a common "Handbook on Return" to be used by the competent authorities of the Member States in carrying out return tasks (C (2015) 6250 final).

The documents themselves clearly define the prerequisites for effective communication with the competent authorities through an interpreter, and the procedure for evaluating an application for international protection should ordinarily provide the asylum seeker with at least:

- the right to remain in the Member State pending a decision by the determining authority;

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- access to the interpretation service when submitting your case in case of an interview with the authorities;
- the right to be informed at crucial moments during the proceedings of his legal position in a language he/she understands;
- and the right to an effective remedy before a court in the event of a negative decision. [8]

Nevertheless, according to par. It is also necessary to ensure that the basic communication necessary for the competent authorities to understand whether persons wish to apply for international protection is provided through interpretation. In addition, individual Member States are obliged to provide interpretation to the extent necessary to facilitate access to the asylum procedure. All Member States are obliged to provide the same guarantees to applicants. Among the procedural safeguards mentioned in Article 12 of Directive 2013/32/EU. In accordance with Article 12 (2) of Directive 2013/32/EU, it is important that applicants are provided with information in a language that they understand or may reasonably be presumed to understand. [9]

Diversity in Unity

Language mediation remains a significant and highly sensitive issue, as it has a direct and non-negligible impact on communication between the national authorities of the individual EU Member States. It also has an impact on the fate of the third-country national detained in the detention facility, especially when applying for asylum. When a common language is not available, the interpretation of procedural acts shall be given special priority. The language barrier should not affect the human rights of third-country nationals or the decision of national authorities regarding the residence of third-country nationals on their territories.

Information regarding remedies should also be available in a language that the third-country national understands or can reasonably be presumed he/she understands. The type of information provided depends on the receiving Member State. Usually, the information is provided in the form of leaflets or reference materials. The implementation of standardized templates would facilitate administrative efficiency, enhance transparency, and significantly reduce the cost of interpretation services. It may also partially address the persistent problem of a lack of interpreters from/to lesser-used languages. As a result of persistent issues pertaining to the dearth of competent and qualified interpreters, numerous nations have initiated the utilization of audio/video conferencing to provide asylum seekers with the opportunity to communicate their requirements. However, the use of this form of interpretation has its pitfalls, which include a lack of privacy, the absence of an interpreter at the place of detention, etc. Since interpretation services are provided free of charge to third-country nationals, and since Member States are responsible for all costs associated with these services, national authorities are responsible for selecting individual interpreters. Since interpreters rely on visual and audio stimuli to determine the meaning of translated speech, it is said that the use of technology often suffers from poor sound quality or is interrupted during an interview. Hearing is insufficient and

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frustrating for both parties, asylum seekers and national authorities, especially when dealing with emotionally demanding situations.

The Member State is entitled to provide a written translation of the relevant information or an oral interpretation, provided that the context and content are clear to the third-country national and that they understand their present legal circumstance. The provision stipulated in Article 5 of the revision of the Reception Conditions Directive 2013/32/EU requires that Member States make all reasonable efforts to ensure that a translation is made into a language that the individual concerned comprehends. The absence of interpreters is not considered an objective reason for not fulfilling this right for third-country nationals. In cases where there is an objective shortage of interpreters, Member States are required to provide at least general information sheets explaining the main elements of the standard form in at least five languages most commonly used by illegal immigrants entering the territory of a Member State. [10]

Pertaining Language Issues

In practice, the protection of fundamental human rights guaranteed under the European Convention on Human Rights (ECHR) in relation to language assistance is interpreted based on the requirements and possibilities of Member States. The language-related provisions have been drafted in a broader sense, thus allowing for a broader interpretation. For example, being 'promptly informed' can include a timeframe ranging from 10 minutes to 24 hours. Moreover, the utilization of an interpreter is subject to varying approaches, as it is uncertain whether the interpreter should assist the authorities from the moment of arrest or through the subsequent phases of detention. Even though the common framework for language assistance is grounded in the European Convention on Human Rights and the EU Directives, the European Court of Human Rights may help to narrow down various interpretations from the Member States and adopt a more unified way through language assistance, as the ECtHR judgment may help to do.

Challenges pertaining to language issues have been raised in numerous instances. As of the beginning of the year 2024, there have been 76 apparent violations of Article 5 (2). [11] However, there were only a few key cases. In the present scientific study, we examined the violations of Article 5 (2) related to the following issues:

- a) information in language understood;[12]
- b) information on charge;
- c) information on reasons for arrest;
- d) prompt information.

Since the number of judgments was significant, only those that appeared to be crucial in shaping the provision of language assistance were taken into consideration. The selected judgments are also reappearing in the Court's Assessment section in the latter judgments, as the respective judgments of key cases were cited as Principles laid down in the Court's case-law. The following cases/judgments [13] were considered as the fundamental ones that have an impact on the language provision in terms of

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fundamental rights and freedoms entitled to third-country nationals who arrive on the territory of the EU:

- **the case of Čonka proti Belgicku, Judgment No. 51564/99** the ECtHR has ruled that a single interpreter cannot provide interpreting services to a group of detainees. The judgment also established that a group of detainees cannot be considered a single entity, and therefore an individual approach is required not only for the purposes of legal aid, but also for the provision of interpreting services.

- **the case of M.S. v. Slovakia and Ukraine, Judgment No. 17189/11** notes that the Slovak authorities did not ignore the applicant's minority and did not provide him with access to an interpreter and a lawyer. On the 23rd of September 2010, at 7.25 p.m., the applicant was interrogated by the border police to ascertain his identity and the circumstances under which he had committed the offense of illegal entry into Slovakia, an offense for which he had been found guilty. On September 24, 2010, an administrative expulsion decision was issued, which also prohibited the applicant from returning to the Slovak Republic for a period of five years. The decision was translated into the Pashto language. The applicant was provided with a translation of the expulsion guidelines into Pashto, which summarised the relevant Slovak legislation and procedures concerning the expulsion of third-country nationals entering the territory of the Slovak Republic illegally. This translated summarises the relevant Slovak legislation and The aforementioned decision also provided an explanation of the available remedies against expulsion. The European Court of Human Rights ruled in favor of the Slovak authorities in this case, as the applicant was listened to and the reasons for his detention were elucidated, including an explanation of the available remedies. The provided instruction was given by members of the Police Force in writing in the Pashto language, which the applicant was able to demonstrate. In the Ukraine case, the court ruled in favor of the State due to the absence of a written instruction given to the applicant in a language that he could readily comprehend.

- **the case of Saadi v. the United Kingdom of Britain, Judgment No. 13229/03** points out at the fact that it is unclear who is responsible for informing the detainee of the reasons for their arrest, such as a member of the Police Force or their legal representative. However, the subject of the judgment is also the form of providing information to the detained person - oral or written. This is because the obligation to provide evidence of the provision of information to a detained person is interpreted differently in the different jurisdictions of the European Union Member States. Nonetheless, based on the verdict, it can be inferred that the delay of 76 hours in furnishing pertinent information (grounds for detention) to the detained individual constitutes a reasonable ground for contravening Article 5 (2). The judgment also established the maximum time frame available for the provision of information and, therefore, for the provision of language assistance.

- **the case of Khlaifia v. Italy, Judgment No. 16483/12** the judgment also regulates how information is provided to third-country nationals who have illegally

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crossed the national borders of Greece. In the event of a court decision, it is imperative to communicate such decisions in writing, presenting both the factual and legal grounds, as well as providing details on the available remedies. Simultaneously, Member States are obligated to provide comprehensive information materials elucidating the primary components of the standard procedure in a minimum of five of the languages most frequently utilized or comprehended by illegal migrants arriving in the Member State in question. Simultaneously, it is imperative that individuals detained from third countries receive systematic information that clarifies the regulations in effect and outlines their rights and obligations. This information shall include information regarding their authority under national law to contact selected organizations and authorities. At the same time, it is about covering communication with detained foreigners within the framework of unofficial contact.

- **the case of J. R. and others v. Greece, Judgment No. 22696/16** the judgment regulates the obligation of the Member State to furnish the detained foreigner with information material (information brochure) in a language that the foreigner comprehends, while simultaneously providing prompt notification of the reasons for the arrest. The responsibility for providing that information remains with the UN High. According to the government, the aforementioned employees distribute legal information brochures, thereby enabling foreign individuals to seek legal assistance for non-governmental organizations. In its judgment, the court also noted that all information was to be provided in plain language. All information should be provided to detained foreigners as soon as possible, but the arresting law enforcement officer may not provide it in full immediately. The court also determines the content of the information material. At the same time, the court notes that the content of the said material was not such as to provide sufficient information on detention, remedies, that the foreigner may contact a lawyer and a police officer and that he may object to the expulsion decision, etc. within 48 hours.

It is clear that the rights concerned are intended to represent minimum standards. In practice, language-related assistance is subject to interpretation from the perspective of individual nations. It is demonstrated through the case law of the European Court of Human Rights that language assistance provisions can be enhanced to a certain extent. Language concerns are frequently raised alongside complaints under Articles 5 and 6 and occasionally in conjunction with Article 14 (prohibition of discrimination). Although the Court has rarely found a violation solely on account of language concerns, the aforementioned cases have provided it with the opportunity to establish the fundamental principles in passages that represent a consolidation of the applicable case-law. [14]

The ECtHR Judgments Redefining the Provision of Language Assistance

The entitlement to language assistance is a fundamental right guaranteed by the European Convention on Human Rights and is also enshrined in secondary EU

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legislation. It is therefore binding on all member states. Due to the case law of the European Court of Human Rights, the provision of language assistance, such as interpretation and translation services, is specified for future use. Questions pertaining to the form of interpretation and translation services provided for the purposes of the asylum procedure remain the responsibility of the national authorities of each Member State and their preferences, whether in oral or written form, as long as they can be presented as evidence for potential ECtHR proceedings. Although the European Court of Human Rights has ruled in favor of a written translation, it also permits oral information to be obtained from the appropriate authorities if it can be presented as evidence for potential proceedings. Likewise, the right to provide information in a language that is understandable to third-country nationals arriving on the territory of the EU Member States is one of the procedural guarantees set out in the ECHR. Nevertheless, it is imperative to provide pertinent information within 24 hours of the detention of a third-country national, as a person detained in a detention facility has the right to be informed of the reasons for their detention. This right is a fundamental component of the law. The precise duration for furnishing information for the above purposes is contingent upon the language proficiency of the detainee, as per case law, the provision of information during detention is deemed preferable. In both forms of language assistance, the information is provided in a language that the detainee comprehends, and in the vast majority of instances, the official language of the third-country national's country of origin is considered. The selection of an interpreter remains the sole responsibility of the national authorities and is founded on the national laws of each EU Member State. It is unclear whether there is a common framework for ensuring the quality of interpretation services and the qualifications of individual interpreters, as qualification criteria vary between Member States. Based on the judgment No. 51564/99 of 5 February 2002 in the case of *Onka v. Belgium*, where one interpreter provided interpretation services to a group of people, the Member State's obligation to assess each case individually was not respected. Taking into account the perception of the individual from a third-country, it is recommended that the individual approach and the physical presence of the individual providing language assistance are preferred. Despite the fact that the physical presence of an interpreter or translator may prove to be challenging from the perspective of national authorities. Nonetheless, the comprehensiveness of the information furnished ought to enable the individual from a third nation to comprehend all the options available to them and their present legal standing.

The relevance of the ECtHR judgments lies in their ability to impose a verdict on a Member State in case the violation of fundamental human rights and freedoms is proved and, therefore, the consequences in the form of penalties are imposed on the Member States. By considering at least the framework for the provision of language assistance to third-country nationals arriving on the territory of the EU Member States, the likelihood of third-country nationals lodging a complaint as an injured party increases significantly, thereby contributing to the creation of a safer environment for all individuals within the Member State.

All third-country nationals detained in detention facilities face challenges that are directly related to their human and procedural rights and need to be communicated on a daily basis. The language (as well as cultural) barrier does not alleviate the

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circumstance for individuals from third countries who are detained on the territory of a Member State whose official language is not spoken by the parties involved in the process outlined above. Despite the fact that the entitlement to language assistance and effective intercultural communication is currently contingent on the level of legal aid, it is still unable to receive institutional support in its application practice and is only gradually defined and interpreted through the case law of the ECtHR.

Concluding Remarks

In many EU countries, third-country nationals have been detected and placed in detention facilities. While some nations possess a proficient police training system for languages that are less frequently utilized, other nations encounter challenges related to the absence of a common language of communication, the absence of competent interpreters, and the absence of legislative regulation of communication between members of the Police Force and individuals from third countries outside official communication. Therefore, the issue of intercultural communication within detention facilities, where it is necessary to communicate everyday needs and instructions, remains unresolved from the point of view of legislation. At this point, it is imperative to note that the proportion of non-official communication with third-country nationals in detention facilities is significantly higher than that of official communication.

The diversity of approaches in addressing the regulation of communication with third-country nationals in detention facilities across EU Member States, which has a direct impact on language provision and respect for human rights of detained third-country nationals may help to address the issue of provision of language assistance in the future as it points at the possibility to make the unification of standard procedure in EU Member States possible as the summarization of problem areas in the foreign language communication affects all EU Member States (not just the countries studied), especially with regard to respect for and protection of human rights and fundamental freedoms to which the injured foreigners are referring, if they apply to a court against the Member State in which they were detained. [15] In order to ensure a standard procedure, the third-country national should be provided with information in a language that they understand.

By delineating zones of divergent interpretation, it is feasible to unify procedures and align national laws pertaining to the provision of language assistance across all EU Member States.

The presented scientific research enhances the possibility of consolidating the applicable case law. The right of third-country nationals to obtain language assistance should be granted by Member States in a way that provides the person concerned with a concrete and practical opportunity to use it. Consequently, the possibility of a penalty by the ECtHR allows for the unification of provisions on language assistance, especially with regard to the provision of interpretation services. The ECtHR judgments provide an occasion to articulate the fundamental principles in passages that consolidate the applicable case law in all EU Member States.

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Based on the conducted research, the following recommendations can be drawn:

- to expand the possibilities of learning in the field of foreign languages within the Police Force, especially for Foreign and Border Police, if possible also in regard to the less widespread languages,
- implement an alternative form of communication in the form of pictures (pictograms) in detention facilities,
- further monitoring of intercultural communication in detention facilities is recommended in order to be able to take appropriate measures to make the communication with third-country nationals more efficient, e.g. extending the communication guide to other languages,
- consider training in intercultural communication for police officers to streamline not only the verbal but also the non-verbal part of communication,
- consider establishing cooperation with universities providing training in interpretation and translation programs and highlighting the urgent need for police practice to address the shortage of interpreters/translators, especially for less widely used and non-European languages,
- draw attention to the need for unified information materials in the languages of detained foreigners to provide basic legal advice, thus enabling Member States to avoid potential penalties from the European Court of Human Rights,
- consider the possibility of equipping the detention facilities with technological equipment enabling automatic translation/interpretation, which would help to resolve communication situations within the framework of unofficial communication,
- consider supplementing the subject of intercultural communication within the specialized training courses for members of the Police Force, and thus not only draw attention to the difficulties of working with foreign language within the police practice, but also offer preparation for resolving situations,
- draw attention to the possibility of harmonizing the way of ensuring intercultural communication within detention facilities, and thus contribute to the creation of a unified system at the national level. [16]

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