

NRPSI Activities

240319 NRPSI Update

All involved with NRPSI are acutely aware of the need to continually call public sector organisations to account given the damage to public service interpreting over many years, particularly since the financial crisis of 2008/09 which stimulated outsourcing as of 2011/12. The key focus is always on the individual who needs help from an interpreter - who needs to be a professional and accredited practitioner, capable of fulfilling the role in whatever setting. A powerful example of the need for this professional to protect a member of the public comes from the Serious Case Review following the death of Daniel Pelka, aged 5, in September 2013: 'Without proactive or consistent action by any professional to engage with him via an interpreter, then his lack of language and low confidence would likely have made it almost impossible for him to reveal the abuse he was suffering at home.'

The efforts of NRPSI in lobbying and advocating protection of, and development of, standards in public service interpreting has led to major changes in the ecosystem already but there is still very much more to do. It is not possible to list everything which has been carried out by NRPSI, but I am however delighted to draw out some of the more significant aspects of NRPSI's recent work.

The more those who are professional public service interpreters who have the qualifications and experience join NRPSI as Registrants, then the louder NRPSI's voice can be. Without statutory recognition of Registered Public Service Interpreters (RPSIs) then the opportunities for failures are much greater; see http://www.nrpsi.org.uk/downloads/Qualifications_and_Experience_Criteria_for_Entry.pdf

NRPSI is not only committed to giving voice to the voiceless - those who cannot speak English and need an interpreter in complex situations where the consequences can lead to life changing outcomes - but is also committed to giving professional public service interpreters a louder voice with government, public sector organisations and other stakeholders who can ensure a fairer ecosystem for all, including those who are accredited, regulated, Registered Public Service Interpreters (RPSIs).

Please see the latest strategy document which was recently published following an in-depth review of current positioning after 28 years of operating.

NRPSI is focused on all these issues mentioned in the document, not least constantly drawing attention to the need to obtain appropriate remuneration, terms and conditions, commensurate with the qualifications and experience of registered, regulated practitioners such as yourself;

<https://www.nrpsi.org.uk/news-posts/NRPSI-Strategy-2023-to-2025-document-is-published-today-click-here-to-read-the-latest-update.html>

“... a non-negotiable bottom line must be that only specialist qualified and experienced professionals be engaged...”

Baroness Cousins

“...that is why the National Register is so important...”

Bishop of Leeds

As reported in Hansard on 31st January 2024

Background

NRPSI is the UK’s independent voluntary regulator of professional interpreters specialising in public service. We maintain a public register of professional, qualified and accountable interpreters, who adhere to the Code of Professional Conduct:

http://www.nrpsi.org.uk/downloads/NRPSI_Code_of_Professional_Conduct_22.01.16.pdf

The National Register is free of charge to access and searchable online.

The need for defendants in court to be able to understand the proceedings, using an interpreter if necessary, was identified in the landmark R v Iqbal Begum Court of Appeal ruling which stated:

‘It is beyond the understanding of this court that it did not occur to someone that the reason for her [the defendant’s] silence..... was simply because she was not being spoken to in a language which she understood.’

As a result, the 1993 Runciman Royal Commission on Criminal Justice recommended that a national register of qualified interpreters should be established with the aim of ‘using only interpreters with proven competence and skills, who are governed by a nationally recognised code of conduct’.

NRPSI was established in 1994 with the support of the (then) Institute of Linguists (IoL) and funded by the Nuffield Foundation, to develop a model for the provision of public services across language and culture. The emphasis was on providing reliable communication in response to the multi-lingual nature of modern UK and public services’ need to provide access to all, irrespective of language barriers.

In 1994 this project laid its foundations for the National Register of Public Service Interpreters (NRPSI).

NRPSI became independent of the Chartered Institute of Linguists (CIoL) on 1st April 2011 and is an independent not-for-profit organisation.

Every interpreter on the National Register has met the standards that were set and agreed with a wide range of stakeholders for education, training and practice in public service.

All Registrants are subject to the NRPSI Code of Professional Conduct and allegations are investigated by an independent Professional Conduct Committee and Disciplinary Committee; see <https://www.nrpsi.org.uk/for-clients-of-interpreters/complaints-about-interpreters.html>

From the Serious Case Review following the death of Daniel Pelka, aged 5, in September 2013:
‘Without proactive or consistent action by any professional to engage with him via an interpreter, then his lack of language and low confidence would likely have made it almost impossible for him to reveal the abuse he was suffering at home.’

Using the National Register to find an interpreter ensures that not only qualified professional practitioners are engaged, but that the interpreter can be held accountable should their conduct or competence fall below the high standards expected of a Registered Public Service Interpreter (RPSI).

NRPSI Registrants are now officially ‘Accredited Professionals’ as of July 2023

Excellent news for all NRPSI Registrants as, at last, they have been recognised as ‘Accredited Professionals’ by the UK Government’s new ‘Regulated Professions Register’, created by the Department for Business & Trade: see <https://www.regulated-professions.service.gov.uk/>
As NRPSI regulated and Registered Public Service Interpreters (RPSI) you can rightly claim to be officially accredited: see below.

Sadly there are, as yet, no restrictions on who can carry out professional public service activities (see <https://www.regulated-professions.service.gov.uk/regulation-types>) but this is a major step to gaining protection of title and statutory recognition for ‘Registered Public Service Interpreters’: see <https://www.regulated-professions.service.gov.uk/professions/chartered-linguist>

MOJ Lobbying

NRPSI has been heavily engaged in lobbying the Ministry of Justice. Note the most recent presentation which was delivered to Ministry of Justice senior management and others within the MoJ extolling the need for improved standards and regulation. It is a vital intervention and one we hope all Registrants are aware of so they realise the nature of pressure being placed at the heart of the UK’s public sector language services: <https://www.nrpsi.org.uk/news-posts/Review-the-NRPSI-presentation-to-the-Ministry-of-Justice-delivered-on-17th-October-2022-here.html>

This is key to gaining changes in the MOJ’s framework, which we know has been the cause of many problems over many years, not least poor remuneration and dissolving standards.

Tackling the negatives of outsourcing has been a major platform for NRPSI’s work and this presentation about outsourcing has been delivered many times:

<https://www.nrpsi.org.uk/news-posts/Review-the-PDF-of-the-Outsourcing-presentation-delivered-on-22nd-June-2022.html>

Of note, private contractors providing services in prisons have been delivering ‘inadequate’ performance, according to a register compiled by Whitehall officials. <https://www.nrpsi.org.uk/news-posts/Outsourcing-in-Prisons-Failing-click-here-for-more.html>. Eleven companies and organisations were identified as failing to meet ‘key performance indicator’ (KPI) targets set by HM Prison and Probation Service (HMPPS); what are the key performance indicators for public service interpreting in the MOJ?

Some of the worst excesses of outsourcing revolve around sub-contracting to other agencies by the main contractor. Lacking tight controls, this leads to situations where no organisation takes responsibility when there is a collapse in good governance, such as when Debonair was put in to voluntary liquidation leaving many interpreters unpaid for work delivered for the MOJ.

NRPSI’s campaign regarding the MOJ’s framework can best be summarised by <https://www.nrpsi.org.uk/news-posts/To-explore-the-differences-between-NRPSI-s-positioning-regarding-MoJ-s-language-services-delivery-and-what-is-currently-happening-in-the-courts-click-here-for-a-summary.html> .

NRPSI ran a sustained public campaign based on images which pinpointed the issues in the MoJ’s language service delivery.

Many NRPSI Registrants joined in this work by ‘Liking’ and ‘Sharing’ the social media posts through 2021; see <https://www.nrpsi.org.uk/news-posts/Click-here-to-see-a-summary-of-the-issues-NRPSI-has-been-addressing-with-the-MoJ-s-language-services-delivery.html>

Many NRPSI Registrants joined in lobbying by writing to their MPs and getting letters back from them following the pressure they placed on the MoJ; see this link for just one of the many letters written by NRPSI for Registrants to send to their MPs; <https://www.nrpsi.org.uk/news-posts/Write-to-your-MP-to-find-out-more-about-how-the-Ministry-of-Justice-defines-assignments-Click-here-for-the-pro-forma-letter-you-can-send-to-your-MP.html>

We believe that without the MP campaign, the commitment from the MoJ to set up an independent review would not have happened; <https://slator.com/uk-conduct-review-of-minimum-qualifications-for-interpreters/> .

The Ministry of Justice launched an independent review of language services delivery, as reported by many media channels including the digital platform ‘Slator’; change and transformation is on the agenda for public service interpreting within HMCTS; see <https://slator.com/uk-conduct-review-of-minimum-qualifications-for-interpreters/>

Baroness Coussins gave a speech in the House of Lords supporting the need for regulation and registration of public service interpreters and the need to ensure recognition and protection of title for those who meet the standards needed to be a professional practitioner; see <https://hansard.parliament.uk/Lords/2021-11-22/debates/E73503CA-6A96-4A1E-82D9-156E084FFA71/PoliceCrimeSentencingAndCourtsBill#contribution-DEBBFD05-93BF-497E-B588-627E6BC84C41>

NRPSI welcomed this support from Baroness Coussins and the All Parliamentary Party Group on Modern Languages; see <https://www.nrpsi.org.uk/news-posts/Read-NRPSI-reaction-to-Baroness-Coussins-intervention-in-the-debate-at-the-Police-Crime-Sentencing-and-Courts-Bill-on-Monday-22-November-2021-click-here.html>

We are still waiting for the full independent review findings, which was called in to being in February 2022, to be published. Having said this, there are positive signs about changes to the framework being developed by the MOJ following many hours over many days, weeks and months of consultation and collaborative dialogue.

For more information on this you should go back to the May 2023 monthly newsletter at <https://nrpsi.cmail20.com/t/t-e-zvdrtd-l-n/> and you can review the current abhorrent framework and then compare with the proposed new framework – a massive change. We continue to pressurise to ensure even this proposed framework is improved.

NRPSI would like to see even more effective standards than the ones outlined in the new proposed draft, and definitely lobby for independent oversight by NRPSI, the regulator, to ensure no repeat of what has been going on for far too long.

You should also see this video of a presentation made to over 40 people at an AIT event, describing the work carried out by NRPSI, pressure placed on the MoJ and a further perspective on the proposed new framework; see https://www.youtube.com/watch?v=b-3k_TaFt2I&feature=youtu.be

The slides for this were also used at a NRPSI Town Hall on 28th June 2023, attended by over 50 Registrants; see <https://www.nrpsi.org.uk/news-posts/NRPSI-Town-Hall-was-held-on-28th-June-click-here-to-see-the-presentation-delivered-at-the-lively-event.html>

NRPSI continues to drive the MOJ and its contracted agencies to make tactical improvements; many partner organisations in PI4J (such as the CIOL, ITI and the APCI, SOMI and AIT) are also lending their voices too.

Please see <https://hansard.parliament.uk/Lords/2021-11-22/debates/E73503CA-6A96-4A1E-82D9-156E084FFA71/PoliceCrimeSentencingAndCourtsBill#contribution-DEBBFD05-93BF-497E-B588-627E6BC84C41>.

Many specific issues are on the agenda with the MoJ:

Operate the current framework as fairly as possible

- Treat engaged public service interpreters and translators as professionals when they arrive to work at courts and tribunals; halt the practice of making language specialists having to queue with the public
- Accept qualification and experience of those checked by voluntary regulators; NRPSI and NRCPD
- Pay off-contract invoices on time
- Do not accept the practice of 'Zero-rating' of invoices by contracted commercial agencies
- Ensure data of those on the MoJ list is not sent overseas for processing by call centre and compliance departments of contracted commercial agencies based off shore
- Remove as soon as is practicable patently inappropriate qualifications from the current framework, such as Degree in Philology and Degree in Linguistics

Build in fair and equitable interpreter and translator fees at framework level

Define and action interpreter and translator fees at framework level ensuring fair and equitable remuneration for interpreters and translators working in HMCTS settings

Increase contractual transparency on rates to interpreters and translators

Increase transparency on 'pass-through' rates to interpreters and translators and setting adequate and acceptable rates of remuneration for interpreters and translators at framework and contract level – essentially linked to protecting the careers and meeting the cost of living for interpreters and translators operating in HMCTS settings

Review practices and current fees around travel time and travel cost compensation

Review practices and current fees around travel time and travel cost, subsistence, and accommodation, where necessary, ensures that interpreter and translator remuneration does not get eroded by rising travel costs, and that compensation for travel time is commensurate with the type and duration of the assignment

Implement greater transparency in definitions of Standard, Complex and Complex Written bookings

What is needed to know to make the decision, who makes the decision, what training have they had and what right of appeal is there for the practitioner to challenge the engagement-definition

Implement minimum assignment duration/charges to match resource allocation

Implementing minimum assignment duration and charge mechanisms at a level matching the required allocation of time and linguist resources ensures that the overall take-home compensation for in-person assignments is at an adequate level

Provision of the nature of offences on all bookings

Set a standard procedure for courts for either direct bookings or via an agency

Remove restrictions on information regarding translation on this document

<https://www.gov.uk/government/publications/criminal-investigations-use-of-interpreters/criminal-investigations-use-of-interpreters-accessible>

Ensure cancellation policies are fair and transparent across the supply chain

Reviewing current cancellation policies contributes to transparent practices across the supply chain, and ensures that in the event of assignment cancellations, compensation is fair, adequate, and commensurate to the cancellation notice and length of assignment. Build pathways and support career progressions in interpreter and translator professions
Collaboration between language services stakeholders in building transparent pathways into interpreter and translator professions promotes entry of new professionals into the interpreting and translation professions and supports career progression within the professions

Implementation of the proposed new HMCTS framework for language services as soon as is practicable

Ensure the new framework, due to come in to operation in October 2025, delivers on the default of Level 6 vocational qualifications for public service interpreters and translators as well as demanding evidenced experience as defined in the draft framework

Amend the number of evidenced hours of experience from 200 hours to 400 hours

Review the experience criteria for public service interpreters and match 400 hours as accepted by the Police Service's PAIT scheme and as defined by NRPSI

Ensure consultation on outsourcing

Recognising the consultative process and collaborative approach with stakeholders has already proved valuable, prior to implementation of the new framework, consult on a wide basis regarding the practice of outsourcing

Details regarding the proposed new framework which PI4J would like to address

Can the term 'pre-professional' be changed to 'L3 Interpreter Level'; there is a sense that the term 'pre-professional' may be seen as demeaning by those who have achieved this qualification, especially if they do not wish to study for and achieve a Level 6 Diploma

PI4J would like to work with the MoJ on granular detail such as defining what are the small number of assignments within the MoJ (outside court and tribunal engagements) which have been identified as appropriate for what is currently labelled a pre-professional interpreter (or a 'L3 Interpreter Level'); which assignments, how will the numbers be monitored and can there be an exhaustive list of settings/situations and /or types of assignment. A seemingly 'straightforward' matter such as bailing a defendant, may be simple *procedurally*, but complex *linguistically* demanding the competencies of a Level 6, experienced 'Professional Interpreter'

Explore moving first-hearings, preliminary-hearings and plea-hearings to be handled by the 'Professional interpreters' level; pre-Diploma 6 training does not prepare individuals for such engagements where the competencies of an experienced and qualified Level 6 professional practitioner may be called upon at any time, as well as in pre/post hearing conferences with solicitors/barristers

An assurance that the 'Exceptions Record' list is purely for pipeline development and not for deployment, even in off-contract bookings. If remuneration, terms and conditions are a quantum improvement on current practices and are attractive and appropriate, commensurate with the qualifications and experience of the 'Professional Interpreter' banding, then there will be many more Level 6 qualified public service interpreters who will gladly begin to work again for the MoJ in court and tribunal settings

Ensure off-contract bookings processes, from initial booking to invoicing and payment, are streamlined and can we have an assurance that those who have Level 6 qualifications and the requisite experience for the default are the first call, even if they are not on the list organised by the MoJ

Explore ways to consolidate spoken language public service interpreting codes; Code of Professional Conduct fusing between police and MoJ (and perhaps the Crown Commercial Service and possibly the Home Office), as well as the code which was developed for NRPSI since the launch of the regulator in 1994

Professional Conduct Committee and Disciplinary Committee protocols to be explored ensuring complaints are transparently and fairly handled to protect the public and also protect the practitioner

Quality Assurance protocols to be explored

PI4J would like to raise a point of clarification with the following paragraph in the proposed MoJ framework. Current paragraph reads:

Whilst a good indicator of professional intent, membership of one of the professional membership or regulatory organisations (CIOL, ITI, APCI or NRPSI) is not sufficient on its own to meet the criteria for MoJ professional level registration. Member qualifications and experience still require checking against the relevant criteria.

In the interest of clarity, we believe the proposed framework would be best served by ensuring as accurate a picture as possible of stakeholder organisations, ensuring *all* the current associations and societies focused on public service interpreting are included in the wording of this paragraph.

In proposing the above amendment to this paragraph, we also suggest amplifying the roles of the various organisations in the spoken language public service interpreting ecosystem, recognising their varying and distinctly diverse natures, as defined by PARN (Professional Associations Research Network):

- I. The voluntary national register and regulator of spoken language interpreters (NRPSI)
- II. Associations and societies acting on behalf of their members; the Association of Police and Court Interpreters (APCI), the Society of Official Metropolitan Interpreters (SOMI) and the Association of Interpreters and Translators (AIT)
- III. Learned institutes with the best interests of the linguist, translating and interpreting professions; the Chartered Institute of Linguists (CIOL) and the Institute of Translation and Interpreting (ITI)

Therefore, at this stage, PI4J would like to ask the MoJ to state:

- i. Whilst a good indicator of professional intent, being a registrant of the regulator (NRPSI), being a member of one of the relevant associations (APCI, SOMI and AIT) or membership of one of the professional learned institutes (CIOL and ITI),) is not sufficient on its own to meet the criteria for MoJ professional level registration. Registrant and member qualifications and experience still require checking against the relevant criteria.*

With regard to BSL it is important to note that although this proposed framework is a welcome advance for spoken language interpreting in MoJ settings, a Level 3 qualification is far below the standard currently expected of BSL Interpreters where the minimum standard of **any** interpretation service is currently a Level 6 language qualification plus attendance on a Level 6 interpreter training programme (the regulator's {NRCPD} Trainee Interpreter).

It is anticipated that over time, and in a planned and resourced manner, all spoken language interpreters working in legal settings will have the same status, recognition and working conditions in line with the MOJ's current BSL requirements.

It is hoped that the accepted standards of the regulator's (NRCPD) Registered Trainee Interpreters (a Level 6 language qualification plus attendance on a Level 6 interpreter training programme) will not be compromised by the new proposed spoken language framework and that this will continue to be regarded as the baseline of a BSL Interpreter.

Promote and prioritise the use of qualified and experienced professionals

Having defined appropriate qualification and experience requirements for the level and difficulty of diverse assignments focusing on the Level 6 vocational qualification default with evidenced experience, ensure independently regulated and registered qualified professionals are prioritised; promote a sustainable supply chain of skilled professionals and support for the professional regulators and registers - NRPSI, the newly launched NRPST and NRCPD

Working with the Police

Historically there have been some police forces which have used the ESPO (Eastern Shires Purchasing Organisation) Framework to engage with public service interpreters; this allows them to work with bilingual native speakers who have enrolled on a Level 1 vocation public services interpreting course.

The development of the DPS (Dynamic Purchasing System) and the launch of the PAIT scheme by the police has been a positive step forward; see <https://www.nrpsi.org.uk/news-posts/Click-here-for-the-latest-from-the-police-regarding-developments-with-the-PAIT-scheme-and-contracts-on-the-DPS.html>

Thanks to the approach by the police language service management team, and the lobbying and advocacy from NRPSI over many years, with partner organisations in the PI4J the police are now focused on engaging with professional interpreters who have level 6 qualifications and 400 hours experience. This is beginning to replicate the exemplar in the public sector language services' ecosystem, the London Metropolitan Police Service, which only engages with regulated and Registered Public Service Interpreters who adhere to the NRPSI Code of Professional Conduct.

There is still much to do with regard to remuneration, terms and conditions for police engagements, but major positive steps have been taken and NRPSI is continuing to lobby for the best possible platform to protect the public and ensure best possible environment for those who are professional practitioners.

NRPSI was present at the Police Interpreter Awards, which was held in Leicestershire on Friday 28th April 2023, alongside Baroness Coussins and John Worne from the CIOL.

Mark Lewis is still keen on developing the disciplinary aspects of PAIT and also keen on visiting the NRPSI office to conduct a police audit; planned for 31st October 2023.

A reminder of the issues on NRPSI's list for the PAIT scheme:

- Halt the discrimination against the regulator of spoken language interpreting when compared to how the police recognise British sign language regulators
- Recognition by PAIT and the agencies of NRPSI's work
- Agencies would then not have to run their own disciplinary processes
- Currently difficult for Registrants to complain about agencies' activities
- Getting on to PAIT via one agency and being on PAIT across all agencies; for instance, clarity on whether someone on TBW's PAIT list can also then be on CINTRA's list
- Rate, terms and conditions need to be addressed; consistency across the UK
- Need for badging and QR codes on badges to ensure transparency and further checks on identity

Lobbying the NHS

With regard to the NHS, please note the recent letter to the government, shadow minister and also to the CEO of the NHS; <https://www.nrpsi.org.uk/news-posts/Click-here-to-read-the-open-letter-sent-to-the-Health-Minister-and-Shadow-Health-Minister-about-the-death-of-a-Gloucester-mother-who-tragically-died-owing-to-a-delay-in-post-birth-treatment-and-poor-interpreting-services.html>

Note NRPSI asking Registrants to write to their MPs regarding the shocking way in which many Trusts handle interpreting issues; <https://www.nrpsi.org.uk/news-posts/Join-the-campaign-to-lobby-for-improvements-in-NHS-language-service-delivery-for-patients-and-save-lives-by-clicking-here.html>.

See <https://www.nrpsi.org.uk/news-posts/If-you-disagree-with-this-statement-then-click-here-people-can-have-legal-representatives-who-can-help-Friends-family-and-non-government-organisations-can-also-assist-the-person.html>

If you have not seen the NHS Guidelines for managing language services, you can find them here: <https://www.england.nhs.uk/wp-content/uploads/2018/09/guidance-for-commissioners-interpreting-and-translation-services-in-primary-care.pdf> . As you can see, NRPSI is accepted as central to best practice; sadly, the NHS is so under-funded, these best practice guidelines are more often than not ignored by procurement management.

Follow up letter re NHS

<https://www.nrpsi.org.uk/news-posts/Click-here-to-read-NRPSI-follow-up-lobbying-with-the-NHS.html>

On 8th August 2023 NRPSI was informed that the NHS's Healthcare Inequalities Improvement team will be leading a language-services scoping review; see the letter dated 8th August 2023 (<https://www.nrpsi.org.uk/news-posts/The-NHS-s-Healthcare-Inequalities-Improvement-team-will-be-leading-a-language-services-scoping-review-see-the-letter-dated-8th-August-2023.html>).

The letter stated: 'Ensuring solutions are identified which that will bring about the necessary changes – we are very much welcoming the opportunity to speak to NRPSI'.

With reference to the above, the following statement was published on the National Register of Public Service Interpreters' (NRPSI's) website on 1st September 2023 (<https://www.nrpsi.org.uk/news-posts/NRPSI-supports-the-call-from-The-Shadow-Health-Secretary-The-British-Medical-Association-and-some-senior-Conservatives-for-the-regulation-of-NHS-managers-initiated-by-the-recent-Lucy-Letby-case-click-here.html>):

NRPSI STATEMENT ON THE REGULATION OF NHS MANAGERS

1 September 2023

As the voluntary regulator of public service interpreters, the National Register of Public Service Interpreters (NRPSI: www.nrpsi.org.uk) supports the call from The Shadow Health Secretary, The British Medical Association and some senior Conservatives for the regulation of NHS managers initiated by the recent Lucy Letby case. (See The Guardian: 'Labour vows to make NHS managers accountable after Lucy Letby failings', 28 August).

We believe in safeguarding the public and providing them with access to the very best that our public services exist to provide – including our health service. This involves supporting public sector professionals to do their jobs as effectively and efficiently as possible, free from the fear of being undermined or let down by the incompetence or misconduct of those facing little or no regulation who work in related fields.

The only way to accomplish this is through greater accountability, which can only be achieved via independent regulation of those professionals that doctors, nurses and other medical practitioners rely on in order to be able to do their job. Independent regulation isn't about restriction, nor should it be about over-complication, it is about enabling people to do their job with confidence, knowing that a transparent system and procedure exists to protect them and others should things go wrong.

NRPSI has been campaigning for only Registered Interpreters with the requisite qualifications and practical experience to be engaged in healthcare settings for some time.

We, therefore, welcome the recent commitment from the Department of Health and Social Care (DHSC) to undertake a review of community languages translation and interpretation (CLTI) services across the NHS and the invitation to consult on this. It is only right that this takes place immediately to ensure those interpreters working with NHS medical professionals are held to equally high professional standards.

***Mike Orlov, Executive Director and Registrar
National Register of Public Service Interpreters (NRPSI)***

Note the answer given by Lord Markham, the Department of Health and Social Care, to the following written parliamentary question from Baroness Coussins regarding interpreting and translation services in the NHS (HL10219):

Question:

To ask His Majesty's Government whether the scoping review of issues and options for improving community languages translation and interpreting services in the NHS has been completed; and if not, when it is expected to be completed, and when the detailed terms of reference and timetable for this review will be published. (HL10219)

Tabled on: 18 September 2023

Answer:

Lord Markham:

The Healthcare Inequalities Improvement Team in NHS England are completing a scoping and options review of the most effective and appropriate national interventions to facilitate improvements in community language translation, and interpretation services, to meet the needs of communities; and support equitable access, experience, and outcomes for all.

The team are aiming to complete the scoping and options appraisal in November 2023 and to agree recommendations in March 2024. There has not been a decision regarding the publication of the terms of reference.

Date and time of answer: 27 Sep 2023 at 15:05.

Also note the following announcement (<https://slator.com/uk-national-health-service-launching-gbp-400m-language-services-tender/>) indicating all Chartered Institute of Linguist members (CIOL) and Institute of Translation and Interpreting (ITI) members are qualified to operate as professional public service interpreters in NHS settings; clearly not the case.

Although all members of both Institutes are qualified linguists as per their membership regulations, not all have the vocational qualifications or experience to act as public service interpreters in NHS settings and not all are regulated and registered with the National Register.

Where 'NVQ' is mentioned, there is no definition as to which grades are acceptable on this proposed framework: is it:

- NVQ Level 1 equivalent to 3-4 GCSE grades 1 - 3 (D-G)
- NVQ Level 2 equivalent to 4-5 GCSE grades 4 - 9 (A*-C)
- NVQ Level 3 equivalent to 2 A Levels

Then also note NRPSI's follow up letter re the NHS: <https://www.nrpsi.org.uk/news-posts/Click-here-to-read-NRPSI-follow-up-lobbying-with-the-NHS.html>

NRPSI was approached on 3rd October 2023 to join the NHS for a meeting on 9th November 2023 – yet this framework seems to have been already publicised as outlined above (<https://slator.com/uk-national-health-service-launching-gbp-400m-language-services-tender/>).

NRPSI notes there has not yet been a decision regarding the publication of the terms of reference for the NHS review, but the team are aiming to complete the scoping and options appraisal in November 2023 and to agree recommendations in March 2024; how does this impact the already announced proposed framework?

In October 2023 there was a job advertised from LLS (the old Capita TI side of the company) where the special instructions were:

"Special instructions to the interpreter

You will be required to assist the client with hiring of a new in-house interpreter, your name and phone number will be provided to the client who will phone you at the time of the session and then you will need to go through some interview questions with them and provide a score."

This is for a large NHS hospital and poses a risk to the public; it seems no qualifications are required - either for the assessor or for the 'in house interpreter'. Engagement fee mentioned is £14.00.

Worthwhile seeing this recent letter from an MP; <https://www.nrpsi.org.uk/news-posts/Message-from-an-MP-I-would-encourage-local-NHS-commissioners-and-providers-to-make-use-of-the-NRPSI-click-here-for-more.html>; support is growing for change.

Lobbying the Home Office

NRPSI has been sharing many key factors involved in engaging with the right interpreter with Home Office procurement specialists aiming for best practice in language services; please note:

Thank you for your email and thanks to John for his testimonial regarding NRPSI's work.

If you do not know about NRPSI it is worth spending time on the website; see www.nrpsi.org.uk and review the news pages for many useful resources such as the launch of the police interpreting awards, the 'Proud' campaign visuals (<https://www.nrpsi.org.uk/news-posts/For-all-those-who-have-asked-for-more-details-about-how-to-use-the-Proud-campaign-visuals-please-click-here.html>) and a presentation extolling the value of independent regulation; see <https://www.nrpsi.org.uk/news-posts/Review-the-NRPSI-presentation-to-the-Ministry-of-Justice-delivered-on-17th-October-2022-here.html>

As the only voluntary regulator of highly qualified and experienced public service spoken-language interpreters, which has been operating for the last 29 years, you will certainly find professional practitioners as Registrants on the National Register; see <https://www.nrpsi.org.uk/for-clients-of-interpreters/why-use-a-registered-interpreter.html>

To fully understand the qualifications and evidenced experience needed by someone who is on the National Register please review <https://www.nrpsi.org.uk/for-interpreters/join-the-register.html> where you will also note the work carried out to check identities and security clearances. The photo ID cards carried by all Registrants, which are renewed each year with a new photograph, have a QR code on the reverse which links you directly to the National Register and their specific entry.

To check how many Registrants there are for specific languages and how to get in touch with them is easy; just set up an account, free of charge and takes a few minutes, and roam around the National Register.

You will see the 'Find an Interpreter' function on all pages of the website.

At the same time, NRPSI is holding the Home Office to account when and where necessary; see <https://www.nrpsi.org.uk/news-posts/Click-here-to-read-NRPSI-s-letter-to-the-Home-Office-regarding-reports-of-plans-to-cut-the-asylum-backlog-by-sending-questionnaires-to-refugees-instead-of-conducting-official-interviews.html>

All this work is bearing fruit; see <https://www.gov.uk/government/publications/criminal-investigations-use-of-interpreters/criminal-investigations-use-of-interpreters-accessible> ; you will find this quote... “If the services of an interpreter are required for evidential interviews and procedures the interpreter **must** be registered on The National Register of Public Service Interpreters (NRPSI)”.

Working with the Crown Commercial Service

The latest iteration of the CCS framework has been much improved and it is anchored with NRPSI’s code of Professional Conduct for the first time.

NRPSI will continue to have constructive dialogue with the management team at CCS and we are all hoping for further improvements which will mean better protection for the public and a fairer ecosystem for professional practitioners.

Such improvements take time but without dialogue, these improvements would not happen.

Lobbying agencies/language service providers

The ATC (Association of Translation Companies), representing the outsourcing interpreting agencies, for the first time ever in January 2020 published a very positive manifesto regarding dealing with professional public service interpreters. We are sure this will have an effect in the future and that there is an inexorable drive to improved relationships within the economic system set up to handle public sector linguistic services; see <https://atc.org.uk/atc-public-sector-manifesto/>; a long way to go but this manifesto, published pre pandemic, is sign of intent to engage and find improvements. NRPSI will continue its lobbying in this arena too. NRPSI issues with agencies to be addressed were outlined in an email in November 2021:

- Accept ‘public service interpreting’ is a profession with professional practitioners and as such, deserves and demands recognition of the independent regulator and respect for the independent register which has no political or commercial pressures
- If funds from public sector organisations are not enough, then do not take the contract; persuade the public sector it has to pay reasonable and fair engagement fees through agencies because agencies need to create shareholder value and pay dividends to shareholders through profits but at the same time can only do this by engaging with professionals who can carry out engagements professionally, otherwise agencies’ pool of interpreters will dry up – where’s the pipeline if we cannot attract new recruits with the right capabilities to the profession
- Act as outsourced engagement agencies – but do not also manage paid for/contracted lists. We ask that agencies start to undo much of the damage which has been caused over the last decade in public service interpreting in the UK because agencies have been running their own lists where quality control has been dissolved with many bilinguals, those who have no relevant vocational qualifications, those with low level vocational qualifications and those with no experience are engaged in roles where they are a danger to the public
- Stop describing public service interpreters as ‘linguists’. True that all professionally recognised and accredited public service interpreters are linguists, but not all linguists are public service

interpreters; this abuse of the term 'linguist' only creates a platform for engaging with those who are not qualified or experienced and should not be conducting engagements

- Do not engage with pseudo-interpreters/ untrained bilingual speakers at low cost, as this is killing the profession and leaving the public at risk
- Engage only those who have relevant vocational qualifications and experience which ensures the public are protected – as well as protecting agencies reputations and reputations of public sector organisations
- Only access public service interpreters from the independent regulator and register; support the call for professionalism in public service interpreting
- Define engagements where simultaneous interpreting is important – so Level 6 is vital (situations where complexity with consequences is at the heart of the engagement) – such as police and court engagements
- Terms and conditions; ensure these are fair and not asymmetrical where all the power is in the hands of the agency such as tbw's approach to MOJ list interpreters
- Remuneration commensurate with qualifications and experience:
 - Per hour amount to be increased
 - Minimum time fixed at more than just an hour; two-hour minimum at least if not more...
 - Travel time to be paid
 - Out of pocket expenses to be covered

In October 2023 the following White Paper was published by a working group of key professional stakeholders, including the ATC, capturing much of the above; see <https://www.nrpsi.org.uk/news-posts/Read-this-paper-setting-out-urgent-recommendations-for-tackling-immediate-challenges-around-procurement-and-provision-of-language-services-for-the-UK-s-public-sector-click-here-for-more.html>

Working with the Interpreting Academy

The National Register has close ties with the Interpreting Academy and is committed to working alongside this organisation as it delivers successfully for the public service interpreting community. Alan Kershaw, NRPSI Chair, recently presented to a meeting at the Interpreting Academy.

Working with other stakeholders

PI4J is a highly effective lobbying body representing the institutes, associations, unions and regulator concerned with improving the situation for professional public service interpreters who are registered, regulated and adhere to the Code of Professional Conduct. To review what other members of PI4J are doing please see <https://pi4j.org.uk/>.

The National Register supports the activity of these partners as much as it can. NRPSI promotes the CPD opportunities which are developed for professional practitioners by institutes, associations and training organisations; see <https://www.nrpsi.org.uk/news-and-links/CPD-Events.html> as well as taking part in conferences and meetings. The next conference NRPSI will attend is the CioL conference in March 2024 to ensure public service interpreters have a voice at this important gathering. NRPSI will also present at the June 2024 ITI Conference.

Marketing Support for Registrants

Please have a look at this guide for usage of NRPSI by those employed in the public sector and beyond. This has been widely distributed by NRPSI and Registrants;

https://www.nrpsi.org.uk/downloads/NRPSI_Register_User_Guide_v220520.pdf .

I know many Registrants have shown interest in the 'Proud' campaign (<https://www.nrpsi.org.uk/news-posts/Proud-to-be-a-Registrant-Does-RPSI-mean-something-to-you-Click-here-and-download-this-PDF.html>) . This campaign has gone down well with Registrants and many are using the visuals.

This presentation was delivered at a recent conference where there were over 100 delegates: <https://www.nrpsi.org.uk/news-posts/Click-here-to-see-a-PDF-of-NRPSI-s-presentation-to-the-delegates-at-the-Celebration-of-Mother-Tongue-conference-organised-by-the-Linguists-Collective.html>.

A video of this presentation has been made available by the event organisers:

<https://www.youtube.com/watch?v=yGedVYe99Kc>

NRPSI LinkedIn site

Followers have increased by over 400% over the last two years due to the volume of news focused on professional public service interpreting; see

<https://www.linkedin.com/company/2134408/admin/>

Mike Orlov's LinkedIn site

Hitting over 18,500 followers, this LinkedIn channel is a superb vehicle for getting messages out about the need for statutory recognition of regulated and Registered Public Service Interpreters (RPSIs); see <https://www.linkedin.com/in/orlovmike/>

NRPSI website; see <https://www.nrpsi.org.uk/>

Registered website users stand at 20,888 in September 2023, compared to 17,124 in September 2019 (pre pandemic and cost of living crisis); an increase of 3,764 or 22%.

This indicates much greater focus on the work NRPSI is conducting on behalf of those who are professional practitioners, complying with the Code of Professional Conduct; follow this link - (http://www.nrpsi.org.uk/downloads/NRPSI_Code_of_Professional_Conduct_22.01.16.pdf)

Examples of NRPSI's publicity activity include:

Legacy media supporting regulated and Registered Public Service Interpreters

Many articles and features have been published in magazines such as the Law Society Gazette, ITI Bulletin Magazine, CIOL's Linguist magazine, the Financial Times and of course the well-received BBC Radio 4 programme entitled 'Giving Voice to the Voiceless'.

This is a phrase often used by NRPSI when advocating statutory recognition for regulated and Registered Public Service Interpreters, first coined by a Registrant.

See this link for one example of legacy media coverage: <https://www.nrpsi.org.uk/news-posts/Financial-Times-article-from-5th-November-as-a-pdf.html>

Also see:

<https://www.nrpsi.org.uk/news-posts/You-will-find-the-latest-NRPSI-article-appearing-in-the-most-recent-edition-of-The-Bulletin-ITI-s-journal-here-click-for-a-short-but-informative-read.html>

...and this link for another example: <https://thelinguist.uberflip.com/the-linguist-archive/the-linguist-59-4-aug-sept-2020>

...as well as <https://www.lawgazette.co.uk/news/cps-to-write-to-defence-teams-linked-to-unqualified-court-interpreter/5107515.article>

Articles written by NRPSI supporting regulated and Registered Public Service Interpreters

Listed below are just some of the articles written by NRPSI, with links to each of the pieces and a quote taken from each feature. Many of these have been picked up by both legacy and digital media, such as 'Government Business Magazine' and 'Health Business Magazine'.

11th November 2019, supporting Registrants operating in Health settings:

<https://www.linkedin.com/pulse/public-service-interpreting-nhs-uk-mike-orlov/>

Quote from the article:

Well- trained, qualified and experienced public service interpreters contribute to the safeguarding of human rights. Registrants who voluntarily accept and adhere to the NRPSI Code of Professional Conduct are inspirational beacons to professionalism in language service provision.'

18th June 2020, making the case for regulation and registration in public service interpreting:

<https://www.linkedin.com/pulse/case-registration-regulation-public-service-language-provision-orlov/>

Quote from the article:

'Independent registration and regulation are valuable controls against 'bad-actors'; exposing their poor delivery when compared to those whose goals are anchored in professional delivery in public-sector language-services. Part of NRPSI's mandate when it comes to upholding standards is to flex every muscle to expose and tackle inequities and inequalities which hamper sustained high-quality delivery for the public.'

25th June 2020, advocating access to public services for all, including those who do not speak English:

<https://www.linkedin.com/pulse/lack-english-language-skills-should-mark-someone-out-second-orlov/>

Quote from the article:

'While state resources are clearly not limitless, it is nevertheless critical to set public sector funding priorities on the basis of commitments to quality-principles, not just supply and cost considerations; especially when lives are at stake. The pressure to save money or recoup costs should not be allowed to insidiously undermine the principle of non-discriminatory access to public services and should certainly not hinder access to justice for all and free and clear access to medical services.'

2nd June 2020, a call for statutory recognition of Registered Public Service Interpreters

<https://www.linkedin.com/pulse/clarion-call-statutory-recognition-registered-public-service-orlov/>

Quote from the article:

'For NRPSI, 'quality' is one of the defining characteristics of the public service interpreting profession. It is the quality of the qualifications and experience of Registrants and the interpreting services they deliver which sets them apart; they represent the pinnacle of the profession. And, of course, the NRPSI Code of Professional Conduct underpinning their professional practice is based on quality and standards.'

11th December 2020, addressing those who engage with public service interpreters

<https://www.linkedin.com/pulse/do-you-work-public-sector-serving-need-make-use-spoken-mike-orlov/>

Quote from the article:

'If the interpreting function fails, we lay ourselves open to miscarriages of justice; misdiagnoses leading to all sorts of problems for patients, medical professionals and the NHS; and desperate situations for those who need help from our social services. To protect the public, to defend the reputation of the public services and to ensure professionalism in public sector interpreting, always ensure you insist on an independently accredited interpreter who has had their qualifications checked, experience validated and their security clearances reviewed; check the annually updated ID card which is only issued each year after a strenuous renewal process for each Registrant.'

13th January 2021, supporting professional public service interpreters:

<https://www.linkedin.com/pulse/nrpsi-independent-register-regulator-professional-public-mike-orlov/>

Quote from the article:

'Add your voice to those calling for recognition of qualified and experienced public service interpreters. Make your support for statutory recognition known to those in government. Embrace those who have the appropriate qualifications, have gained experience and are prepared to put themselves on the line, adhering to NRPSI's Code of Professional Conduct. Regulated and Registered Public Service Interpreters are there for those who need it most - those who cannot speak English but need to interface with the UK's public services.'

27th April 2021, the future for public service interpreting

<https://www.linkedin.com/pulse/future-independent-registration-regulation-public-services-mike-orlov/>

Quote from the article:

'Would you accept an unregistered and unregulated doctor diagnosing your ailments? Of course not. Would you accept a barrister acting on your behalf in a trial or bail hearing who has only been approved by a commercial organisation whose primary concern is maximising profits? I very much doubt it.

So why accept the services of an interpreter without the appropriate Diploma in Public Service Interpreting (DPSI) in Health or Law who is not independently registered and regulated?

There is no reason why anyone should tolerate this when it is possible to work with a professional and qualified public service interpreter who has at least 400 hours of experience, checked and accredited by the independent, not-for-profit Regulator of spoken word public service interpreting.'

19th May 2021, asking is it futile to demand statutory recognition for professional public service interpreters PART 1

<https://www.linkedin.com/pulse/blowing-wind-mike-orlov/>

Quote from the article:

'If a public sector organisation calls someone a 'Language Professional' when they are patently untrained, under-qualified or inexperienced, why should we trust that particular public sector organisation? Why would you trust any commercial organisation accepting contractual requirements that drives them to recruit bilingual speakers for government engagements? Are they surrendering standards, ethics and public safety in pursuit of company profits, dividends for owners and shareholder value? Are they encouraging less than acceptable requests from questionably managed public sector organisations which put cost and supply before ensuring spoken word public sector interpreters are fit to act on behalf of someone who does not speak English? Sadly, such things are already happening.

Consequently, it is not pointless to pursue statutory recognition for professional public service interpreters; it is not 'blowing in the wind'. Not when public trust lies in independent regulation, in the assurance that professionals are being regulated by the independent body, where there is no interest in maximising revenue from government contracts or reducing costs by paying interpreters lower engagement fees.'

25th May 2021, asking is it futile to demand statutory recognition for professional public service interpreters PART 2

<https://www.linkedin.com/pulse/tilting-windmills-future-public-service-interpreting-uk-mike-orlov/?trackingId=78%2Bp8%2FY5SX2Gdh%2BQQqndRg%3D%3D>

Quote from the article:

'Clearly, NRPSI still faces very real challenges in its pursuit of statutory recognition for public service interpreting, its protection of the title of Registered Public Service Interpreter (RPSI) and for the independent registration and regulation of RPSIs to become mandatory. However, we are a long way from 'tilting at windmills', and we remain committed to championing and protecting safeguarding-standards for the public. And we are committed to holding to account those who

would change or dismantle these standards to suit expediency, profit or ease supply issues by eroding serious and vital matters of principle.'

14th June 2021, lobbying the UK Government for it to be mandatory for public sector organisations to only engage with independently registered and regulated public service interpreting professionals

<https://www.linkedin.com/pulse/taking-account-accountability-mike-orlov/>

Quote from the article:

'As long as public sector organisations continue to operate without NRPSI's involvement in protecting, maintaining and developing standards, NRPSI will continue to attempt reflective and constructive dialogue with those in authority with the aim of achieving best possible practice in spoken word public service interpreting for one reason only: to protect the public, giving voice to the voiceless, no matter what their mother tongue.

All practitioners and managers in public service organisations should demand that the spoken word interpreters engaged by them are registered with, and regulated by, NRPSI – the independent Regulator for spoken word public service interpreting in the UK. Where would you put your trust: in a commercially-driven agency that recruits, supplies and disciplines those on their lists as per their commercial contracts with public sector organisations? Or an independent, not-for-profit regulator concerned with protecting the public?'

25th June 2021, extolling the value of independent regulation of public service interpreting

<https://www.nrpsi.org.uk/news-posts/You-will-find-the-latest-NRPSI-article-appearing-in-the-most-recent-edition-of-The-Bulletin-ITI-s-journal-here-click-for-a-short-but-informative-read.html>

Quote from the article:

'Since 1994, NRPSI has been the only independent not-for-profit regulatory body focused purely on professionalising spoken word public service interpreting to protect both the public services and public from poor interpreting practice. Independent registration and regulation will motivate and incentivise government, the public sector and those private companies in the ecosystem to behave in an ethically bound, socially responsible manner. Independent registration and regulation are the only means of holding those in positions of authority to account. The alternative is for them to be able to set and manipulate standards to suit them, as indeed they have been doing.

NRPSI is robustly addressing these issues and aims to achieve recognition of the value of independent registration and regulation across the UK, ensuring quality standards do not slip anymore and you and your colleagues can hold your heads high as recognised and registered public service interpreters.

NRPSI will continue to lobby government organisations and decision-makers for it to be made mandatory for public sector organisations to only engage with independently registered and regulated public service interpreting professionals across all nations in the UK.

NRPSI, which is free from commercial and political influence, will continue to lobby for and represent the public's interests, highlighting poor language services practice and processes in defence of the public service interpreting profession. It is through this activity that your interests will be protected; and adding your voice to this activity will only help speed things up.'

27th July 2021, speaking up for standards in public service interpreting

<https://www.linkedin.com/pulse/speaking-up-spoken-word-interpreting-standards-mike-orlov/>

Quote from the article:

'Faced with decision-making by public sector organisations which puts the public at risk, we desperately need a UK-wide system of professional registration and regulation for spoken word public service interpreting that is both independent and transparent to ensure the public is protected.

The processes of registration, regulation and accrediting fitness to practice must not be hidden behind closed doors, where public sector organisations and private companies actively block them from public review.'

1st June 2022, Article from Ted Sangster in the Interpreting Academy newsletter and broadcast through LinkedIn channels and NRPSI website

<https://www.nrpsi.org.uk/news-posts/Click-here-to-read-the-latest-Interpreting-Academy-newsletter-including-an-article-from-NRPSI-s-outgoing-Chair.html>

Quote from the article:

'The work that interpreters do every day is of vital importance for both the public services and for the clients being interpreted. While the life and death situations quoted at the head of our Strategy may be exceptional, just about every job an interpreter carries out has the potential to change someone's life.

This is why it is crucial that every interpreter working in the public services is properly accredited. It is our mission to ensure that this is accomplished.'

3rd August 2022, Article from Agnieszka Ghanem in the Interpreting Academy newsletter and broadcast through LinkedIn channels and NRPSI website

<https://www.nrpsi.org.uk/news-posts/Click-here-to-see-the-6th-issue-of-the-Interpreting-Academy-newsletter.html>

Quote from the article:

'To do things right is to do them by the best possible standards you can find in the industry; standards which have been developed over the last 28 years through advocacy and lobbying for 'protection of title' by the NRPSI, ensuring regulated and Registered Public Service Interpreters have the respect and standing which reflects their professionalism.

Professional interpreters should not only achieve qualifications (where these exist) and continuously update their skills through CPD and experience. They also should respect, and adhere to, the recognised and acclaimed Code of Professional Conduct emphasising the ethics which mark out a professional practitioner.

This code not only guides you in what to do (or not to do) in a professional context, but it also protects you and your rights as a language interpreter. Being regulated by the independent voluntary regulator gives assurance to your prospective clients that you are taking your profession seriously and are accountable for your actions.'

21st March 2023, regarding interpreting and the NHS by Phil Muriel, Non-Executive Director, NRPSI
<https://www.nrpsi.org.uk/news-posts/Click-here-for-a-thoughtful-article-by-Phil-Muriel-about-interpreting-in-the-NHS.html>

Quote from the article:

'Would you be shocked to know the NHS routinely uses unqualified interpreters? If there aren't enough Registered Interpreters to meet demand, the answer isn't to use under-qualified or unqualified individuals; to the contrary, the answer is for the NHS to strengthen its own guidelines and to make it a requirement (not a recommendation) that the interpreters it works with are properly qualified and registered with the appropriate organisation.'

April 2023, Article from Alan Kershaw published in the Interpreting Academy newsletter and broadcast through LinkedIn channels and NRPSI's website

Quote from the article:

'An independent regulator – in this case, the National Register of Public Service Interpreters (NRPSI), ensuring standards are maintained by all registered professionals. This regulator is a trusted and reliable guarantor for the competence and conduct of Registrants. Central to its purpose are to:

- *protect the public*
- *nurture trust and confidence in the profession,*
- *deliver independent accreditation of the quality of the service offered by professional Registrants*
- *set professional standards that must be achieved*
- *ensure these are maintained and enhanced*
- *raising the standards, and so the standing, of the profession of public service interpreting.*

Are you doing a job or acting as a professional in public service interpreting?'

Town Hall Meetings

NRPSI has been running a series of Town Hall meetings where Registrants can share their issues and be assured of follow up by the NRPSI secretariat. Areas of concern expressed in these meetings have been passed back to the relevant authorities, as NRPSI ensures Registrants' voices are amplified and heard.

Webinars

Follow this link (<https://we.tl/t-5nid0NMbam>) for an example of the many webinars delivered by NRPSI encouraging professionalism in public service interpreting, targeting those who are interpreters, those who work in public service settings and those who are in positions of authority to instigate changes.

Also see the webinar slides which have been presented a number of times for Registrants who want to improve how they run their own business; <https://www.nrpsi.org.uk/news-posts/Managing-Your-Own-Business-webinar-slides-click-here.html>

Perhaps one of the key issues being addressed regularly by NRPSI is the need to review outsourcing as the basis for much public sector interpreting engagement. NRPSI has never stepped away from this issue, as witnessed by the many articles listed above. In June 2022, NRPSI addressed outsourcing again at a webinar organised by the AIT; see <https://www.eventbrite.co.uk/e/outsourcing-reviewing-history-and-planning-for-the-future-tickets-272070800087?aff=ebdsoporgprofile>

University Presentations

NRPSI has presented over 40 times to university modern language departments in the last 3 years, visiting universities in person prior to the pandemic but continuing the work remotely since the first lock down. These efforts are ensuring a stream of highly educated future public service interpreters are taking level 6 vocational qualifications and are beginning their careers as regulated Registered Public Service Interpreters.

It is valuable to listen to the concerns of undergraduates, postgraduates, early career researchers and faculty. Given this closeness to universities, NRPSI is working with the 'University Council of Modern Languages' (UCML) to lobby the public sector about ensuring fair remuneration, terms and conditions to ensure a future pipeline of professional practitioners.

The above is just some of the recent work carried out by NRPSI.

In summary...

Listen to the recent BBC 'File on 4' radio programme – found here:

<https://www.bbc.co.uk/sounds/play/m001sm8z>

And read the most recent coverage in the Times here: <https://www.nrpsi.org.uk/news-posts/Read-here-in-PDF-format-the-article-published-in-The-Times-on-Thursday-December-07-2023-written-by-Catherine-Baksi-reviewing-issues-in-public-service-interpreting-click-here.html>

Please see these posts on LinkedIn for most up to date summary of current activity:

<https://www.linkedin.com/company/2134408/admin/feed/posts/>

....and...

[https://www.linkedin.com/feed/update/urn:li:activity:7122157899434315777/?commentUrn=urn%3Ali%3Acomment%3A\(activity%3A7122157899434315777%2C7122838524617211904\)&dashCommentUrn=urn%3Ali%3Afsd_comment%3A\(7122838524617211904%2Curn%3Ali%3Aactivity%3A7122157899434315777\)](https://www.linkedin.com/feed/update/urn:li:activity:7122157899434315777/?commentUrn=urn%3Ali%3Acomment%3A(activity%3A7122157899434315777%2C7122838524617211904)&dashCommentUrn=urn%3Ali%3Afsd_comment%3A(7122838524617211904%2Curn%3Ali%3Aactivity%3A7122157899434315777))

Residents of the UK should have no hindrance to access public sector services – and not speaking English is a major hindrance; see Part 7 of the Immigration Act;

<https://www.gov.uk/government/publications/immigration-bill-part-7-language-requirements-for-public-sector-workers> ; Part 7 of the act ensures there is no language barrier to members of the public accessing public services.

Under The Equalities Act 2010 people who do not speak English have the right to be provided with an interpreter when they are dealing with public sector organisations. The Equalities Act 2010 prohibits direct or indirect discrimination on the basis of a protected characteristic, such as race or religion – implicit in this is language:

(<https://www.gov.uk/government/publications/translations-and-interpreters>)

The Crown Prosecution Service states the right to an interpreter is an integral part of the right to a fair trial. It is a principle of English common law that the Defendant must be able to understand the charges made against them and be able to properly defend themselves.

See <https://www.cps.gov.uk/legal-guidance/interpreters>. Of note the CPS states: **‘interpreters ‘working within the Criminal Justice System should be registered on the National Register of Public Service Interpreters (NRPSI) given NRPSI is an independent, voluntary public interest body and the core role is to ensure that standards within the profession are maintained for the benefit of the public and interpreters.**

The need for defendants in court to be able to understand the proceedings, using an interpreter, if necessary, was identified in the landmark R v Iqbal Begum Court of Appeal ruling which stated:

‘It is beyond the understanding of this court that it did not occur to someone that the reason for her [the defendant's] silence..... was simply because she was not being spoken to in a language which she understood.’

The right is also enshrined in the European Convention on Human Rights.

The Police and Criminal Evidence Act 1984 (PACE), section 13, dictates that a suspect must not be interviewed unless arrangements are made for a person capable of interpreting to assist the suspect to understand and communicate. PACE is the short form for the Police and Criminal Evidence Act 1984. This Act governs the major part of police powers of investigation including, arrest, detention, interrogation, entry and search of premises, personal search and the taking of samples.

The police have a legal duty under (PACE) to make sure that arrangements are in place for the provision of a suitably qualified and independent interpreter for a person who is deaf or who does not understand English.; see

https://www.google.co.uk/search?q=pacelaws+uk+and+interpreting&sc_esv=569153003&sxsrf=AM9HkKlImAG43_d9USqOablt28fSxYNsLgA%3A1695912604461&ei=nJIVZeLiG_u2hblPr-uEMA&ved=0ahUKEwjioO_ixs2BAxV7W0EAHa81AQYQ4dUDCA8&oq=pacelaws+uk+and+interpreting&gs_lp=Egxnd3Mtd2l6LXNlcniAihXBhY2UgbGF3cyB1ayBhbmQgaW50ZXJwcmV0aW5nMgUQIRigAUjAS1D0EliBOnABeAGQAQCYAZoBoAHPCqoBBDE2LjG4AQzIAQD4AQHCAgoQABhHGNYEGLADwglGEAAyFhgewglIEAAYigUYhgPCAggQIRgWGB4YHclCBxAhGKABGAriAwQYACBBiAYBkAYI&sclient=gws-wiz-serp

With reference to health services in the UK, it is the responsibility of NHS service providers to ensure interpreting and translation services are made available to their patients free at the point of delivery.

Healthcare professionals themselves should check with their Trust employer about their service's interpreter booking processes: <https://www.england.nhs.uk/wp-content/uploads/2018/09/guidance-for-commissioners-interpreting-and-translation-services-in-primary-care.pdf>

The NHS has a legal responsibility to make sure that the services they provide are equally accessible to all sections of the community. Guidance to services also makes clear that a professional interpreter should always be offered where language is an issue in discussing health matters:

<https://www.healthwatch.co.uk/advice-and-information/2022-05-19/does-nhs-have-provide-interpreter>

As the guidance for commissioners states: 'Spoken language interpreters should be registered with the National Register of Public Service Interpreters (NRPSI) and hold a Diploma in Public Sector Interpreting (Health)'; see page 17 of this document: <https://www.england.nhs.uk/wp-content/uploads/2018/09/guidance-for-commissioners-interpreting-and-translation-services-in-primary-care.pdf>

The 1993 Runciman Royal Commission on Criminal Justice recommended that a **national register of qualified interpreters** should be established with the aim of 'using only interpreters with proven competence and skills, who are **governed by a nationally recognised code of conduct**'.

Following the Royal Commission, NRPSI was established in 1994 with the support of the (then) Institute of Linguists (IoL) and funded by the Nuffield Foundation, developing a model for the provision of public services across language and culture. The emphasis was on providing reliable communication in response to the multi-lingual nature of modern UK and public services' need to provide access to all, irrespective of language barriers.

NRPSI became independent of the Chartered Institute of Linguists (CioL) on 1st April 2011 and is an independent not-for-profit organisation.

Every interpreter on the National Register has met the standards that were set and agreed with a wide range of stakeholders for education, training and practice in public service.

All Registrants are subject to the NRPSI Code of Professional Conduct and allegations are investigated by an independent Professional Conduct Committee and Disciplinary Committee; see

<https://www.nrpsi.org.uk/for-clients-of-interpreters/complaints-about-interpreters.html>

Important to note disciplinary processes, guided by the code of Professional Conduct, are handled independently of NRPSI's secretariat, with the committees manned by judges, magistrates, barristers, solicitors as well as experienced RPSIs; See

<https://www.nrpsi.org.uk/for-clients-of-interpreters/disciplinary-committee.html>

Using the National Register to find an interpreter ensures that not only qualified professional practitioners are engaged, but that the interpreter can be held accountable should their conduct or competence fall below the high standards expected of a Registered Public Service Interpreter (RPSI)

NRPSI is the UK's independent voluntary regulator of professional interpreters specialising in public service. The National Register is free of charge to access and searchable online. We maintain a public register of professional, qualified and accountable interpreters, who adhere to the Code of Professional Conduct:

http://www.nrpsi.org.uk/downloads/NRPSI_Code_of_Professional_Conduct_22.01.16.pdf

When an interpreter is working in a public service setting, usually in a potentially life-changing or life-threatening interview situation, they are the only person who understands what both of the other parties are saying. If the professional ability and integrity of the interpreter cannot be relied upon, the potential for abuse of the public's trust is clear.

NRPSI's core function is to protect the public and the public purse from poor practice in interpreting and to ensure those engaged as interpreters in the public sector are appropriately qualified, have the right levels of experience, and are ready to carry out interpreting assignments.

The risks and ramifications of not using highly qualified and experienced, accredited, independently regulated and registered public service interpreters in the courts, in police interview rooms and in doctors' consulting rooms, to name but a few of the scenarios in which they should be used, is incalculable; why take the risk.

Mike Orlov
240319

Equality of access to public sector services is highlighted within several documents including:

- European Convention for the Protection of Human Rights and Fundamental Freedoms 1950
- United Nations Convention on the Rights of the Child 1989
- Human Rights Act 1998
- United Nations Convention on the Rights of Persons with Disabilities 2005
- Equality Act 2010 (NHS England has responded to the specific equality duties in this Act)
- The NHS Constitution 2012
- Health and Social Care Act 2012
- Social Value Act 2013
- Accessible Information Standard (SCCI1605) 2016

All public sector organisations have a responsibility to meet the communication support needs of all public service users and to provide appropriate access to interpreting, translation and transcription services when needed.