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24<sup>th</sup> February 2023

Claire Medhurst  
Deputy Director of Intelligent Client Capability  
102 Petty France  
London  
SW1H 9AJ

Dear Claire,

On behalf of the member organisations of the PI4J I am writing to you regarding the proposed new Ministry of Justice Qualifications and Experience Framework, based on the Independent Review of Qualifications and Experience Requirements (June 2022).

Following PI4J meetings held on 9<sup>th</sup> February 2023 and on 23<sup>rd</sup> February 2023, it was agreed that:

1. This new proposal is a major leap forward compared to the current framework given the default to a Level 6 vocational qualification with experience for professional interpreting engagements in MoJ settings; delighted to have had this assured through recent stakeholder meetings
2. Obviously, it does not deliver on everything PI4J and constituent member organisations have lobbied for so there is still much to address and PI4J and its constituent members would like to continue with the consultative process to tackle other aspects of spoken language interpreting, as well as any issues regarding BSL interpreting, some of which will fall into the Policy Review and some in to the Outsourcing Review
3. Recognising the consultative process and collaborative approach with stakeholders has already proved valuable, PI4J would like to continue in the spirit of collaboration to uncover further possible amendments to the framework:

- i. Remuneration, terms and conditions which more properly sit in the discussions around the Policy Review and the Outsourcing Review as well as the work of the Pipeline Group
- ii. Addressing the issues regarding outsourcing; see the NRPSI 'Outsourcing' presentation for useful information:  
<https://www.nrpsi.org.uk/news-posts/Review-the-PDF-of-the-Outsourcing-presentation-delivered-on-22nd-June-2022.html>  
PI4J is looking forward to making submissions to the Outsourcing Review
- iii. 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
- iv. 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'
- v. 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
- vi. 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
- vii. 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

- viii. 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
  - ix. 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
  - x. Quality Assurance protocols to be explored
4. Recognition of the need for protection of title of regulated, Registered Public Service Interpreters (RPSI), the value of independent regulation and the role of NRPSI, as proposed by Baroness Coussins ( <https://hansard.parliament.uk/Lords/2021-11-22/debates/E73503CA-6A96-4A1E-82D9-156E084FFA71/PoliceCrimeSentencingAndCourtsBill#contribution-DEBBFD05-93BF-497E-B588-627E6BC84C41> . ) has not been accepted in this proposed framework, but much that is being proposed is a great leap forward.
5. PI4J would like to raise a point of clarification with the following paragraph in the proposed MoJ framework. Current paragraph reads:
- i. 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.*
6. 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.
7. 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)

8. 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.*

9. 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).

10. 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.

11. 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.

We very much look forward to hearing from you.

Yours sincerely

Andy Murray  
Chair  
Professional Interpreters for Justice Steering Committee (PI4J)

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