



National Register of  
Public Service Interpreters



National Register of  
Public Service Translators

# Frameworks

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Executive Director & Registrar  
November 2023



Registered  
and Regulated  
Interpreter

# Frameworks



Frameworks - what are they and how they affect you

- What is a framework
- How many are there
- How do they differ
- What does this mean to you

# Occupation or Profession...



Serious professions need standards and some form of regulation

The definition of an occupation focuses on regular activity performed to earn daily bread. Professionals clearly have to do this but there is much more to being a professional than earning money in a specific field of activity

Three essential pillars in an effective regulatory structure protecting standards

A profession requires:

- A high degree of knowledge and expertise in a specific field
- Continuously expanding knowledge and expertise
- Recognition and trusted independent accreditation of professional practitioners' competencies against agreed professional standards

# Towards National Standards



Registered  
and Regulated  
Interpreter

- Government and public sector organisations' appetites for regulation of PSI



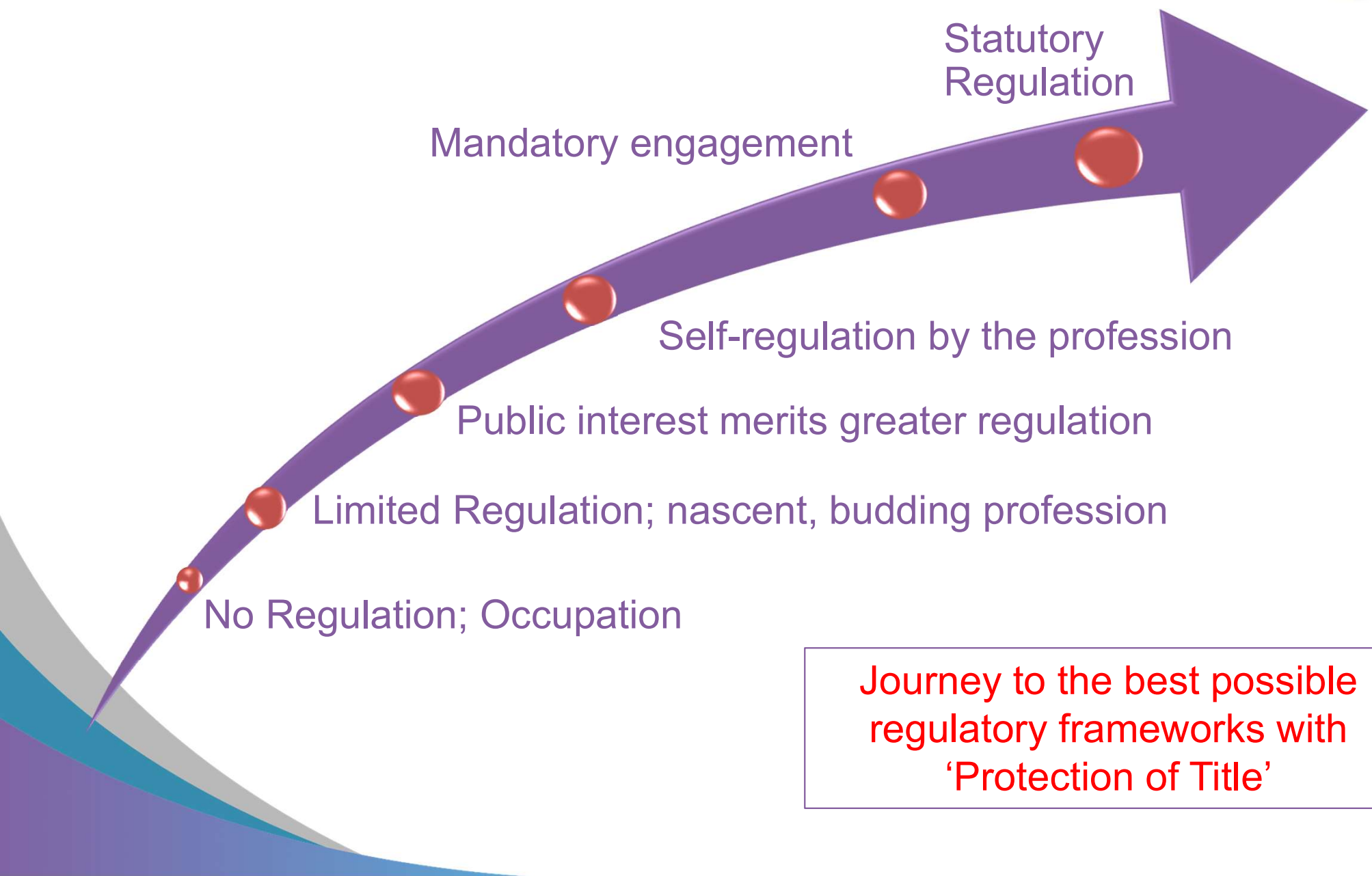
# Regulated or Unregulated



A profession has a *governing body* when the complexity of service-delivery has *risk* which needs to be minimalised and mitigated

*Regulated professions* ensure accountability of professional service delivery by those who are registered and regulated, protecting standards

# Regulated or Unregulated



**Journey to the best possible regulatory frameworks with 'Protection of Title'**

# What is a Framework



## Frameworks – what are they?

- Procurement
- Standards
- Remuneration
- Terms and Conditions

# What is a Framework



## Lord Bellamy

### The Parliamentary Under-Secretary of State for Justice

...the right to translation and interpretation (sic: interpreting) services is a right at common law and integral to the right of a fair trial

...enshrined in Article 5 of the European Convention on Human Rights, which deals with the police station, and Article 6, which deals with the fair trial point

...neither of those are affected by the present retained EU law Bill so the substance of the domestic provisions will continue



# What is a Framework



## Criminal Proceedings; Interpreters

- <https://questions-statements.parliament.uk/written-questions/detail/2019-01-10/HL12743>

21 January 2019

- Directive 2010/64/EU of the European Parliament and of the Council of 20 October 2010 on the right to interpretation (sic: interpreting) and translation in criminal proceedings was transposed into UK domestic law by 27 October 2013 when it came into force
- The Government has no plan currently to alter those provisions

# How Many Frameworks....



Frameworks – how many are there...

- CCS
- ESPO
- Range of sector specific frameworks...

# How do Frameworks Differ...



Frameworks – how do they differ...

- HMCTS including MOJ
- Dynamic Purchasing System (DPS) for the PAIT Scheme
- NHS

# MOJ...



## Reaffirming the importance of professional practitioners in spoken language public sector language services

2012 onwards: ALS; Capita TI; TBW

- Outsourcing the engagement function
- Outsourcing the list of interpreters which can be deployed in MOJ settings
- Dissolving standards; anecdotal evidence from 2012 to 2021
- NRPSI 25<sup>th</sup> Anniversary Event; Feb 2019

“...we are not planning any significant change to our current quality measures & qualifications matrix. Neither sits in isolation, and our suite of contractual measures provide us with the necessary assurances that there are not wholesale issues with the service. The same applies to our MoJ register...”

**MOJ email to NRPSI: 22<sup>nd</sup> February 2021**



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Become NRPSI registered and stand out from the crowd.

**NRPSI** National Register of Public Service Interpreters

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# MOJ...



Reaffirming the importance of professional practitioners in spoken language public sector language services

## The MP Campaign 2021 ...then the Ad Campaign 2021/2022



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# MOJ...



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## Where would you put your trust?

### 1. #Regulation

#### NRPSI

National Register of Public  
Service Interpreters

NRPSI advocates independent  
regulation of public service  
interpreting to safeguard  
professional standards from  
political and commercial influence.



#### MoJ

The Ministry of Justice's  
language services

The MoJ is comfortable  
with devolving regulation  
of its language services to  
commercial agencies.

Where would you put your trust: in a contracted commercial language agency focused on delivering a profit to its shareholders or an independent, not-for-profit regulator concerned with protecting the public by maintaining professional standards?

# MOJ...



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## Where would you put your trust?

### 2. #Priorities

#### NRPSI

National Register of Public  
Service Interpreters

NRPSI puts the interests of  
the public first by maintaining  
professional public service  
interpreting standards.



#### MoJ

The Ministry of Justice's  
language services

The MoJ allows supply  
and cost considerations to  
compromise the quality of its  
language services.

Where would you put your trust: in the MoJ's contracted commercial language agency, which is focused on delivering a profit to its shareholders, or an independent, not-for-profit regulator concerned with protecting the public?

# MOJ...



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## Where would you put your trust?

### 3. #Transparency

#### NRPSI

National Register of Public  
Service Interpreters

NRPSI has a transparent  
complaints procedure and  
disciplinary process.



#### MoJ

The Ministry of Justice's  
language services

The MoJ's complaints and  
disciplinary processes are  
managed by a commercial  
agency and unavailable to  
public scrutiny.

Where would you put your trust: in a contracted commercial language agency focused on delivering a profit to its shareholders or an independent, not-for-profit regulator concerned with protecting the public by maintaining professional standards?



# MOJ...



National Register of  
Public Service Interpreters

[www.nrpsi.org.uk](http://www.nrpsi.org.uk)

## Where would you put your trust?

### 4. #Accessibility

#### NRPSI

National Register of Public  
Service Interpreters

NRPSI Registered Interpreters  
appear on a free-to-access  
searchable online register.



#### MoJ

The Ministry of Justice's  
language services

The MoJ's list of language  
speakers is built by  
commercial agencies and is  
not in the public domain.

Where would you put your trust: in a list of 'interpreters' built for commercial purposes that's closed to public scrutiny or a publicly available register of interpreters regulated by an independent body?

# MOJ...



National Register of  
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[www.nrpsi.org.uk](http://www.nrpsi.org.uk)

## Where would you put your trust?

### 5. #Qualifications – Part 1

#### NRPSI

The National Register of  
Public Service Interpreters

**97%** of NRPSI Registered  
Interpreters have a degree level,  
vocational DPSI\* qualification.

\*Diploma in Public Service Interpreting (DPSI) or  
equivalent qualification



#### MoJ

The Ministry of Justice's  
language services

**49%** of those on the MoJ's list  
of language speakers that  
is built and managed by its  
language services contractor  
have a DPSI qualification.

Where would you put your trust: in a list of 'interpreters' built for commercial purposes or a register of interpreters regulated by an independent, not-for-profit body focused on professional standards?

As of March 2021, there are 1,660 NRPSI Registered Interpreters and 2,184 language speakers on the MoJ list of interpreters.

# MOJ...



National Register of  
Public Service Interpreters

[www.nrpsi.org.uk](http://www.nrpsi.org.uk)

## Where would you put your trust?

### 6. #Qualifications – Part 2

#### NRPSI

The National Register of  
Public Service Interpreters

Only **3%** of Registered  
Interpreters do not possess  
a DPSI\* (level 6) qualification.

Of these, 2% speak Rare Languages (for which  
no DPSI qualification exists at the point of entry  
onto the NRPSI register) and 1% have only completed  
two of the five DPSI modules.

\*Diploma in Public Service Interpreting (DPSI) or equivalent qualification



#### MoJ

The Ministry of Justice's  
language services

**51%** on the MoJ's list of language  
speakers do not possess a DPSI  
(level 6) qualification.

Of these, 26% have other language qualifications (e.g. a  
degree in philology: the study of language in oral and written  
historical sources) but no public service interpreting qualification.

25% have lower-level public service interpreting qualifications:  
HNC\* (level 4), A level (level 3), GCSE A, B and C grades (level 2).  
Note, this group also includes bilingual speakers who have  
enrolled on or achieved a GCSE pass (level 1) qualification.

\*Higher National Certificate (HNC)

Where would you put your trust when a court judgement is at stake: in a bilingual speaker who has just enrolled on a low level interpreting course or a Registered Interpreter with the relevant public service interpreting professional qualification?

As of March 2021, there are 1,660 NRPSI Registered Interpreters and 2,184 language speakers on the MoJ list of interpreters.

# MOJ...



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## Where would you put your trust?

### 7. #Experience

#### NRPSI

The National Register of  
Public Service Interpreters

**95%** of NRPSI Registered  
Interpreters possess a minimum  
of 400 hours of proven public  
service interpreting experience.

Of the 5% who do not possess 400 hours of experience, the 2% who speak Rare Languages are required to provide evidence of 100 hours of experience. The remaining 3%, who possess the relevant DPSI\* qualification, must demonstrate they are working towards the required hours of experience.

\*Diploma in Public Service Interpreting (DPSI) or equivalent qualification



#### MoJ

The Ministry of Justice's  
language services

The MoJ doesn't require  
anyone on its list of interpreters  
with any level of public service  
interpreting qualification to  
provide evidence of any public  
service interpreting experience.

As of March 2021, there are 1,660 NRPSI Registered Interpreters and 2,184 language speakers on the MoJ list of interpreters.

Where would you put your trust when a court judgement is at stake: in a bilingual speaker who hasn't provided any evidence of any practical experience of public service interpreting or a Registered Interpreter who has provided evidence of 400 hours of practical experience and has also had this verified by an independent regulator?

# MOJ...



## Reaffirming the importance of professional practitioners in spoken language public sector language services

- Baroness Coussins November 2021 in the House of Lords
- MOJ commitment to an independent review February 2022
- Release of the draft proposal for a new framework; February 2023...
- Comment back following PI4J consultations
- Published for review in May 2023

.....much to be appreciated....and much to still be done...



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# MOJ...



We understand:

- Ministers have agreed this new qualifications and experience framework in principle
- Any final decisions about the framework will be made by ministers following the next language services contract tendering process and costs analysis
- The proposed new framework is subject to change prior to implementation

The proposed new framework is an improvement on the current framework

- Raises the bar on the level of qualifications and experience an interpreter will need to have to work in MoJ settings
- But it does not deliver all of the improvements we have called for and that we believe are necessary to uphold public service interpreting standards and protect the public
- So, our lobbying efforts continue in the spirit of collaboration in recognition of the progress made so far through what has been a consultative process with stakeholders

# MOJ...



## 9<sup>th</sup> February 2023 at a PI4J meeting, agreed that:

- This new proposal is a major leap forward compared to the current framework given the default to a Level 6 vocational qualification, and 200 hours evidenced experience for professional interpreting engagements in MoJ settings; delighted to have had this assured through recent stakeholder meetings
- Obviously, it does not deliver on everything PI4J and constituent member organisations have lobbied for so there is still much to address; to continue with the consultative process to tackle other aspects of spoken language interpreting, as well as any issues regarding BSL interpreting

# MOJ...



## Reaffirming the importance of professional practitioners in spoken language public sector language services

- **Ensuring interpreters receive remuneration that is commensurate with their skills, experience and qualifications, as well as fair terms and conditions.** These issues more properly fit into discussions around the Policy and the Outsourcing aspects of the ongoing review of the MoJ's language services as well as the work of the Pipeline Group (Note the work of the BBC with qualitative and quantitative research)



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# MOJ...



## Reaffirming the importance of professional practitioners in spoken language public sector language services

- **Addressing the issues regarding outsourcing**, Professional Interpreters for Justice (PI4J) is looking forward to making its submission to the Outsourcing Review; see the NRPSI 'Outsourcing' presentation



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# MOJ...



## Reaffirming the importance of professional practitioners in spoken language public sector language services

- **Changing the term ‘pre-professional’ to ‘pre-Diploma’** so as not to undermine those who haven’t achieved this qualification, especially if they do not wish to study for and achieve a Level 6 Diploma. Related to this, PI4J would like to work with the MoJ on the granular details relating to the small number of assignments within the MoJ (outside court and tribunal engagements) that have been identified as appropriate for a pre-professional interpreter (or a pre-Diploma interpreter): the types of assignment, how numbers will be monitored and whether an exhaustive list of settings/situations and/or types of assignment can be produced



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# MOJ...



## Reaffirming the importance of professional practitioners in spoken language public sector language services

- Exploring making it a requirement that first hearings as well as preliminary and plea hearings are handled by 'professional interpreters' with a Level 6 Diploma qualification. Level 3 to 5 (pre-Diploma) qualifications do not prepare individuals for such engagements or any pre/post-hearing conferences with solicitors/barristers



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# MOJ...



## Reaffirming the importance of professional practitioners in spoken language public sector language services

- **Obtaining an assurance that the 'Exceptions Record' is purely for pipeline development and not for deployment, even in off-contract bookings.** If sufficient improvements are made to professional interpreters' remuneration and their working terms and conditions, then it follows that more Level 6 qualified public service interpreters will make themselves available to work in MoJ settings



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# MOJ...



## Reaffirming the importance of professional practitioners in spoken language public sector language services

- **Attaining equal recognition and rights for Level 6 qualified professional interpreters** to those granted to other professionals in the court, such as an 'Interpreters' Room' and speedy access to the court



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# DPS and PAIT...



## National Police Interpreter Awards 28<sup>th</sup> April 2023

National Police Language Services Conference, organised by the national lead for language services, the Leicestershire Police

Special thanks to the management team of the **Dynamic Purchasing System** and **PAIT**



# DPS and PAIT...

## National Police Interpreter Awards 28<sup>th</sup> April 2023



The awards ceremony, dedicated to professionalism and interpreters who were nominated by police forces and agencies, was a powerful reminder of the work conducted by language practitioners

Congratulations to the winners and runners-up:

- Spoken Interpreter of the Year is Samira Hajmi, NRPSI registration number 16241
- Runner Up is SheŊi Bytyqi, NRPSI registration number 11589
- The Simon Cole Award for Excellence in Police Interpreting:
  - Karina Stefanescu, NRPSI registration number 12270



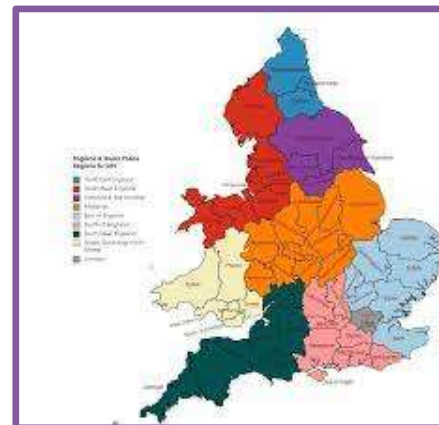
# DPS and PAIT...



## The Dynamic Purchasing System:

### Contracting areas and 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 at registration and renewal and PCC/DC
- Agencies and PAIT would then not have to run their own quals checks or 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
- Transparent professional conduct and disciplinary processes and protocols; make use of the 'gold standard'
- NPPV3 should be mandatory, not just enrolling on to NPPV3



### Police Regions

- North East England
- North West England
- Yorkshire and the Humber
  - Midlands
- East of England
- South of England
- South West England
  - Wales
  - London

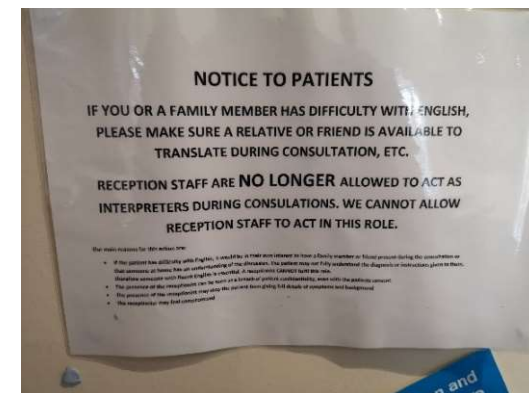


# NHS Frameworks



## NHS Frameworks – how do they differ...

- North of England Commercial Procurement Collaborative (NOE CPC)
- Shared Business Service framework SBS/21/NL/ZWV/10127
- Black Country PFT-ORG-POL-01
- NHS Interpretation and Translation Services Framework
- Primary Care Guidance Framework
- ....the 'Wild West'...4 hours training....



# NHS Update...



## Lobbying the NHS

- 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>
- Call to action and asking NRPSI Registrants to write to their MPs, many joined in; see <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>. This is a very effective tool in lobbying and actually kick-started many improvements being planned in the MOJ, but not yet implemented, following a similar campaign in 2021

# NHS Update...



## Lobbying the NHS

- See 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>
- You will see NRPSI is accepted as central to best practice; sadly the government so under-funds the NHS these best practice guidelines are often 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>
- Appointment by the NHS of a lead for language services for the first time ever
- Meeting on 9<sup>th</sup> Nov, followed by the BBC programme on 21<sup>st</sup> Nov

# How Important are Frameworks



Frameworks – what does all this mean to you?

- Standards
- Terms and Conditions
- Remuneration
- Relationship with Agencies - see 'Working Together'
  - From £35 to £26 an hour for police work
  - £18 for MOJ
  - From £13.00 to £11.50 for NHS and then 17 pence a minute

# The Future...



There is a continuing and increasing need for standards and professionalism in public sector spoken language services

Ensuring effective regulation of those acting as interpreters and translators in potentially life-changing interactions with the public services has never been more important



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# What NRPSI is not....



## Not:

- An agency...
- A union...
- An examining body...
- A regulator of examinations...

According to PARN there are approximately 400 professional bodies in the UK...

Representing most professionals in the UK...

- Learned institutes driving professions and acting for members
- Professional associations and societies acting for members
- **Regulatory bodies with qualifying Registrants protecting the public and overseeing agreed professional standards**

# The Future...



## NRPSI's Goals

- Secure protection of title for public service language professionals
- Lobby for statutory regulation for public service language professionals
- Lobby to obtain appropriate remuneration, terms and conditions, commensurate with the qualifications and experience of registered, regulated practitioners
- Establish NRPST and grow NRPSI
- Build on our regular conversations with Registrants
- Increase effectively our use of media platforms
- Become active across all areas of public service interpreting and translating, matching levels of attainment to the complexity of work; Level 3 issues
- Continue effective dialogue with public sector organisations such as the Police, the MOJ, the NHS, the Home Office...
- Develop dialogue with executive and legislative functions across the UK

# The Future...



So...Self-regulation will continue, accountable to the *profession*, operating and promulgating standards which have been designed to ensure quality practices, and to accredit those fit to practise

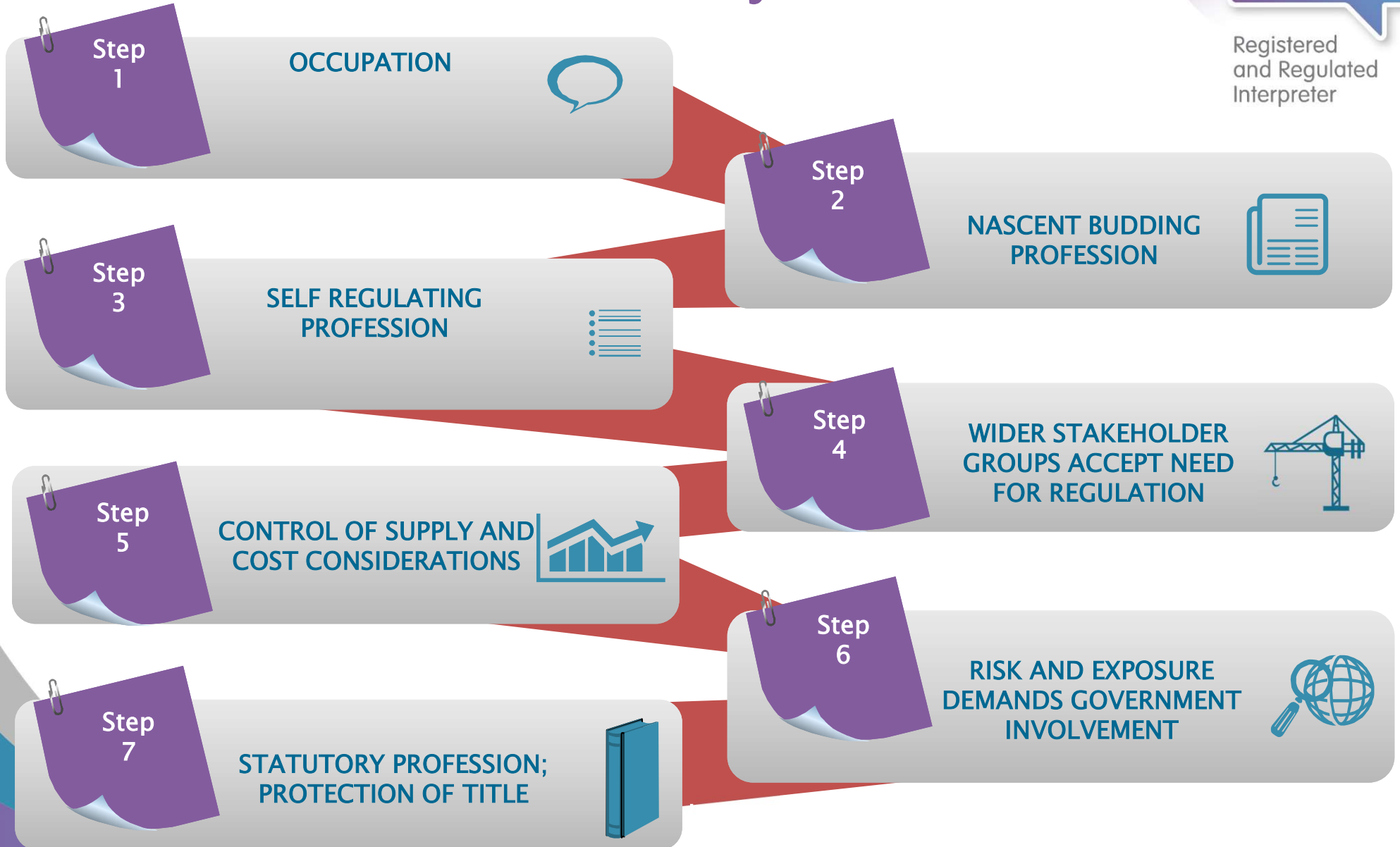
The extent to which the state has an interest in regulation of professional PSIs, and how these practitioners are regulated, depends on *political necessity*...and the *levels of risk* which need to be addressed by government



# Inexorable Inevitability...



Registered  
and Regulated  
Interpreter



# Contacts and Links



- [mike@nrpsi.org.uk](mailto:mike@nrpsi.org.uk)
- [www.nrpsi.org.uk](http://www.nrpsi.org.uk)
- [www.nrpst.org.uk](http://www.nrpst.org.uk)
- [www.linkedin.com/company/2134408/admin/](http://www.linkedin.com/company/2134408/admin/)
- [www.linkedin.com/in/orlovmike/](http://www.linkedin.com/in/orlovmike/)

NRPSI Code of Professional Conduct:

<http://www.nrpsi.org.uk/for-clients-of-interpreters/code-of-professional-conduct.html>

History of the National Register:

<http://www.nrpsi.org.uk/news-posts/Access-to-Justice-A-Report-of-the-Nuffield-Interpreter-Project-1993.html>

Latest PAIT newsletter and CIOL review of the PAIT scheme

<https://www.ciol.org.uk/sites/default/files/PAIT%20Scheme%20Newsletter%20Nov%202022.pdf>

Review the current and proposed future MOJ frameworks:

<https://nrpsi.cmail20.com/t/t-e-zvdrtd-l-n/>

See NRPSI's Outsourcing presentation:

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



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# Frameworks

Mike Orlov  
Executive Director & Registrar  
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