

## **240811: History of NRPSI**

Going back in time demands starting at the beginning and this has to take in to account information from the Runciman Royal Commission; see <https://www.gov.uk/government/publications/report-of-the-royal-commission-on-criminal-justice>

You also need to see the 2001 Lord Auld Report on the Review of Criminal Justice System - Interpreters Chapters; <https://www.criminal-courts-review.org.uk/ccr-00.htm>

Both of these learned reviews gave, separately, life to NRPSI and encouraged its continued being. See a summary of Lord Auld's findings:

### ***Review of the Criminal Courts of England and Wales: September 2001***

#### ***Introduction***

*1 On 14th December 1999 the Lord Chancellor, the Home Secretary and the Attorney-General appointed me (Lord Auld) to conduct this Review into the working of the Criminal Courts and to report within a year. My terms of reference were to inquire into:*

*"the practices and procedures of, and the rules of evidence applied by, the criminal courts at every level, with a view to ensuring that they deliver justice fairly, by streamlining all their processes, increasing their efficiency and strengthening the effectiveness of their relationships with others across the whole of the criminal justice system, and having regard to the interests of all parties including victims and witnesses, thereby promoting public confidence in the rule of law."*

*2 The Lord Chancellor, in announcing my appointment, said:*

*"The Government's aim is to provide criminal courts which are, and are seen to be:*

- modern and in touch with the communities they serve;*
- efficient;*
- fair and responsive to the needs of all their users;*
- co-operative in their relations with other criminal justice agencies; and*
- with modern and effective case management to remove unnecessary delays from the system."*

### ***Chapter 11 - The Trial: Procedures and Evidence***

#### ***Interpreters***

*155 The Runciman Royal Commission commented on the difficulties of obtaining good quality interpreters at police stations and at court. They made a number of recommendations, in particular, for their better training and remuneration. [171]*

*156 There have been considerable improvements since then. From 1998 the courts have been responsible for securing the attendance of suitable interpreters for defendants. [172] The parties remain responsible for providing interpreters for their own witnesses. In 1993 a National Register of Public Service Interpreters was established, which provided for a system of accreditation, guaranteeing that all its members were properly trained, conformed to professional standards and were subject to monitoring and disciplinary procedures. [173] Similarly, The Council for the Advancement of Communication with Deaf People Directory provides a list of accredited interpreters which conform to the same quality standards. Those two National Registers are the main sources for selection of interpreters required for all*

*the criminal justice system agencies It is intended by the Trial Issues Group that by the beginning of 2002 all agencies will be able to rely exclusively on them when selecting interpreters for criminal investigations and court proceedings. However, there are continuing difficulties in the distribution and variable standards of interpreters, resulting in a somewhat patchy provision of services country-wide. In some areas where there are few non-English speakers, there would normally be a correspondingly low demand for interpreters at local police stations and courts. But there will always be occasions when there is a demand that cannot readily be met, one that may be aggravated by surges of asylum-seekers from different countries and the high levels of competence now required of interpreters.*

*157 The establishment of the National Registers is a welcome improvement, but more needs to be done, particularly as the Human Rights Act 1998 may require a greater guarantee of the competence of interpreters than before. A recent attempt by a sub-group of the Trial Issues Group [174] to produce a national needs analysis on which to base further planning and work was thwarted by poor response from many local Trial Issues Groups. [175] The national Group, working on the responses available, found that shortages of interpreters in various languages had necessitated significant recourse to non-accredited interpreters, for example, to meet the recent increase in the number of immigrants from the Balkan States. As I understand it, the Trial Issues Group has attempted, with the National Register and the Institute of Linguists, to meet this problem, but its efforts have not been matched by government funding for wider and better local training where needed.*

*158 There are a number of other bodies or associations, with overlapping memberships or registration involved in accreditation and maintaining public registers of interpreters' services. These include: the Institute of Translation and Interpreting, the Association of Police and Court Interpreters, the Institute of Linguists and the Association of Sign Language Interpreters. This seems to me a wasteful spread and duplication of resources for the various bodies and their members, and an inefficient way of providing a comprehensive national and local service to the courts.*

*In my view, it would be sensible, make much better use of resources and provide a better service to those involved in or exposed to criminal investigation and the courts, if the work of all these bodies were concentrated, as appropriate in one or other of the two national Registers, preferably by some form of amalgamation. At the very least, they should all meet the same standards of accreditation as the two National Registers.*

He refers to the 'two registers', one being NRPSI and the other NRCPD for British Sign Language.

## **Struggle with Commercial Agencies since the Introduction of Outsourcing**

### **2007; The National Agreement**

Issues which were addressed by not just NRPSI but also by many who cared about the quality of interpreting offered to people who needed it most; those who could not speak English but were facing dealing with the UK's public sector, be it police, courts, NHS, DWP and all other such organisations. Get in touch with [mike@nrpsi.org.uk](mailto:mike@nrpsi.org.uk) if you want to see the whole document.

### **11<sup>th</sup> August 2011**

#### **Professional interpreters against GB MoJ outsourcing**

<https://www.iatis.org/index.php/news/other-news/item/277-professional-interpreters-against-gb-moj-outsourcing>

*We, the professional interpreters of the National Register of Public Service interpreters (UK), are against the Ministry of Justice's outsourcing of interpreting and translation services, all in the name of savings. Awarding a contract to a single, private, commercial agency will not bring about savings. This same agency will be the regulator and examine the interpreters. No public service profession is governed by a commercial agency. Justice will not be served by this course of action.*

10<sup>th</sup> October 2011

#### **NRPSI supported the debate against outsourcing**

[https://hansard.parliament.uk/commons/2011-10-10/debates/1110115000002/InterpretationServices\(MinistryOfJustice\)](https://hansard.parliament.uk/commons/2011-10-10/debates/1110115000002/InterpretationServices(MinistryOfJustice))

A framework agreement to regulate the supply of police and court public service interpreters has been brokered by the Ministry of Justice. Its intentions are to endeavour to ensure that interpreting services to the judiciary and police are delivered to a high standard via qualified interpreters in a way intended to save about £18 million annually against the current £60 million budget. The Ministry of Justice has decided that the best way to do so is to let a contract to a single self-regulating commercial organisation that will book interpreters, individually or through agencies, to service the police and courts; determine a rate for the job; and monitor not only the quality of the interpreters' work and need for further training and review, but its own performance.

However, it is highly questionable whether this framework agreement and Applied Language Solutions, which is the agency that will provide interpreters, will be able to meet the Ministry of Justice's requirements.

The plans introduce three tiers of interpreters, and the intention is to rank interpreters into one of three categories, with a rate of pay of £22 for tier 1, £20 for tier 2, and £16 for tier 3. Interpreters will be ranked according to their qualifications, but also subject to the agency's own assessment, to which already fully qualified interpreters would be expected to subject themselves at their own personal cost.

These rates of pay, along with severe restrictions on travel expenses and an end to travel-time payments, will result in interpreters refusing to sign up to the agency, or to take specific jobs, because of the low rates of pay. I have received evidence from one interpreter in Greater Manchester whose current net pay after travel expenses for a typical magistrates court job in Greater Manchester is £103.75 for anything [Toggle showing location of Column 155](#)

up to a three-hour job, whereas under the proposed framework agreement it would be £10 for a one-hour job or £50 for a three-hour job, which equates to £4.44 per hour for one hour, rising to £11.76 per hour if the job lasts three hours.

Perhaps an even starker example is that of a Lithuanian-speaking interpreter who sometimes has to travel to Plymouth Crown court from Surrey because of a lack of qualified Lithuanian-speaking interpreters. Under the current agreement, they would receive £246.25 after travel costs for the 11.5-hour return trip. Under the new framework agreement, this would be minus £65.10 after travel costs. Does the Minister seriously think that that is acceptable, and does he really think that this will be an incentive to accept that particular job?

#### Anti outsourcing demonstration in 2011 by NRPSI Registrants



September 2012

**See the Justice Committee Written evidence from the Professional Interpreters for Justice.**

This submission is made on behalf of the following representative bodies which are partners in the Professional Interpreters for Justice campaign:

- National Register of Public Service Interpreters (NRPSI)
- Institute of Translation and Interpreting (ITI)
- Association of Police and Court Interpreters (APCI)
- Society of Official Metropolitan Interpreters (SOMI UK)
- National Union of Professional Interpreters and Translators (NUPIT)/UNITE the Union
- Professional Interpreters' Alliance (PIA)
- Society for Public Service Interpreting (SPSI)

Additionally, the Chartered Institute of Linguists (CIoL) is a participant in the Campaign's Steering Committee as an observer, and in common with several of the above bodies will also be submitting evidence in its own right.

The full submission is definitely worth in-depth scrutiny as an argument and case against outsourcing.

**See this 2013 article**

<https://irr.org.uk/article/shambolic-and-unworkable-outsourcing-of-court-interpreting-services/>

**Court Interpreting Privatisation 2.0**

*As the current Ministry of Justice Framework Agreement for court interpreting services in England and Wales comes to an end, a reflection on the current situation and the new framework agreement which takes effect on 31 October 2016*

On an average day, around 700 requests for foreign and sign language interpreters are made by courts and tribunals in England and Wales. Qualified, professional legal interpreters provide a broad range of language services across the civil and criminal courts. Without them, parties would not understand proceedings and would be denied the right to a fair hearing. The role of interpreters in the justice system is not minor.

Nonetheless, in a recent criminological study on language and power politics within the criminal court system, researchers at the [University of Warwick](#) found that “while formal legal language is inaccessible to many of the lay people who routinely pass through the criminal courts, non-English speakers are significantly more disadvantaged in spite of the assistance of interpreters no matter how good they are.” The communities interpreters assist – [migrants and the disabled](#) – are among the worst hit by the government’s ongoing austerity measures, public service cuts and privatisation. They are further disadvantaged and marginalised by the negative discourse surrounding them in the media and by politicians. The privatisation of court interpreting services in 2012 worsened this situation and has had a serious impact on the whole court system.

### ***The first cut...***

On the premise of making savings and increasing efficiency, following a bidding process, in August 2011 the Ministry of Justice (MoJ) entered a 4-year £168 million language services framework agreement with a language service provider called Applied Language Solutions Ltd. to cover the whole justice system. In October 2011, a further 5-year contract worth £90 million was signed to cover the courts and tribunals. Before the contract was rolled out nationally on 30 January 2012, the company was bought by Capita, trading as a new division called [Capita Translation and Interpreting](#) (Capita TI) – a public services outsourcing giant with no prior language sector experience – allegedly without the knowledge of the MoJ.

The service was previously provided by self-employed interpreters registered with the still operational [National Register of Public Service Interpreters](#) (NRPSI), an independent professional regulatory body with over 2000 members. The national framework agreement was a disaster from the word go. Most professional interpreters continue to boycott it due to the drastic pay cuts they would have had to take and the steep fall in quality requirements.

[Baroness Coussins](#) recently summed up the problems faced in the courts over the past five years due to this framework agreement as: “Problems included unqualified or underqualified interpreters and people with no experience of courts or the judicial system and its language. In one case, the so-called interpreter did not know the difference between murder and manslaughter. People with the wrong language turned up: in one case, a Lithuanian interpreter arrived for a Slovakian prisoner; fortunately, they both spoke Polish so they muddled through. Often no one turned up at all because of a flawed booking system.”

The MoJ prefers to focus on “improvements” and the unsubstantiated saving of [£38 million](#) the agreement is reported to have made. As key costs, such as those for [rescheduling court cases](#) where interpreters do not attend, are not recorded, the accuracy of such a figure is questionable.

### ***... is the deepest?***

MoJ statistics, published in April 2016, show that only in the final quarter of 2015 was Capita TI finally able to meet the [98% completed requests target](#) in the agreement, meaning it had previously failed to perform the contract. The overall completion rate in 2015 was 97%; in the first year of operation it was 90.2%. The latest statistics, for the first quarter of 2016, show that Capita TI has been [unable to maintain that momentum](#).

The statistics provide only a partial picture. Rates have no bearing on the quality of the service provided. For rarer languages and deaf services, completion rates are far lower and do not include the high level of customer cancellations, particularly for sign language interpreting. The MoJ relies exclusively on Capita TI to provide statistics on its own performance, which only covers completed requests.

In early May, a [written parliamentary question](#) revealed that more than 2600 court cases had been adjourned due to interpreter unavailability since 2011. This figure conceals a worrying likelihood: many court cases simply proceed without an interpreter. It says nothing of the poor quality offered in too many cases attended by an unqualified interpreter.

In spite of consistent criticism, Capita TI has done well out of the [agreement](#): “Our Framework Agreement with the Ministry of Justice for the provision of language services makes us one of the largest providers of public sector interpreting services in the UK.” [In 2015](#), its revenues grew by around 9%.

### **Facepalm**

Many of the problems in the existing framework agreement relate to the failure of the MoJ and its contractors to recognise the central role interpreters play in the interpreting process. Interpreters are viewed as foreign language or British sign language (BSL) communicators and not as highly skilled language professionals who negotiate and relate different legal systems and sensitive matters and situations in more than one language.

That situation does not appear to have changed. Few improvements have been made. The damage done to undermine the quality of court interpreting over the past five years may well be permanent. Prior to launching the tender for the new framework agreement, the MoJ held a consultation which included interpreter representative groups. In March 2015, interpreters [launched a manifesto](#) setting out their demands for the new agreement; these have been largely ignored.

Many interpreters have been calling for the framework agreement to be scrapped altogether; the apparatus to provide court interpreting services was already in place. In response to the heightened risk to BSL interpreters – and thus the deaf community – the [National Union of British Sign Language Interpreters \(NUBSLI\)](#) launched a [#ScrapTheFramework campaign](#) in February 2015.

### **Back to square one**

The MoJ announced the successful suppliers for the new framework agreement on 27 May. In spite of some structural changes, the new package is strikingly similar to the old one. The agreement, currently held solely by Capita TI, has been divided into four contracts: (1) – face to face, telephone and video interpretation; (2) – translation and transcription; (3) – non-spoken languages; (4) – independent quality assurance. The MoJ informed existing interpreters in an e-mail that “The new contracts aim to deliver a high quality service and address the needs of the business in a sustainable way, whilst addressing historic recommendations about how to improve the service.” Privatisation is a business; the provision of public services is not.

Capita TI only unsuccessfully bid for the second lot. The chosen suppliers are [thebigword Group Ltd.](#) for foreign language interpreting, translation and transcription (1, 2), [Clarion Interpreting Limited](#) for non-spoken language services (3) and [The Language Shop](#) (London Borough of Newham) to provide independent quality assurance. The contract is for four years, with the possibility of annual renewal for a further three years and covers the entire justice sector (courts, police, probation services, etc.).

Clarion and The Language Shop have not commented further. On [19 August](#), thebigword announced it had signed a £120 million contract with the MoJ, which includes the development of a trainee scheme. This follows [another 4-year public service interpreting contract](#) also awarded to the same company in May 2016. The £120 million contract, the largest public interpreting and translation contract, is larger than that awarded to Applied Language Services in 2011 with fewer services. In 2011, thebigword was the runner up but may well not have qualified for the SME criterion.

In a [press release](#) issued upon being awarded the contract in May, thebigword stated that it is “the largest interpreting services provider in Europe” and that linguists currently working in the justice system “will see improved working conditions.” When asked what these conditions would be, it told [The Law Society Gazette](#) that details could not be confirmed “as details are still being discussed and finalised” and it is “determined to make sure conditions are improved.” It also stated that some current Capita TI staff will be transferred to it.

### **Reboot**

The MoJ's choice of thebigword as a successor to Capita TI is indicative of how little it has learned. Unlike Capita TI, Leeds-based thebigword has over 30 years of experience in the language sector and extensive public sector experience already. Like Capita TI, however, it has a reputation for poor rates and conditions of work. thebigword has long been subject to criticism for its frequent reductions in rates for linguists. As early as 2002, a blogpost raised concerns about a [15% cut in rates](#) for translators "as the market for translation is tightening and we are experiencing real pressure on our prices."

Other blogposts have raised [similar concerns](#), with cuts made in at least 2008, 2011 and 2013. In 2013, [thebigword](#) sought to reduce rates to as low as GBP 0.038 per word due to the economic downturn and as "never before has our industry experienced such huge pressure from both the private and public sector to drive down prices." In the same year, the [company announced](#) "Further positive trading has allowed one of Yorkshire's most internationally focused businesses to pay its highest paid director a bonus in excess of £1.5m."

### **You're hired!**

thebigword appears to have a great PR team but the figures do not always add up. thebigword currently states that it has [8000 linguists](#) on its books. This number suggests a shrinking company: in a [2010 interview](#), the CEO claimed it had 9000 linguists and in 2014 the [BBC reported](#) it had over 12,000 linguists.

The number of linguists a translation or interpreting company has on its books – all of whom are self-employed and not employees of the company – is a moot point. Anyone can register with such a company without ever working for it and qualification checks are not always carried out. Under the current framework agreement, Capita TI claimed it had 1200 qualified linguists, whereas it had only found 280 by the time the contract went live. In 2012, a Czech interpreter from Birmingham was able to [register her pet rabbit](#) as a MoJ interpreter.

Following the announcement of the contract award in May, the MoJ informed linguists that "the register of language professionals will be held by the Ministry of Justice", maintained by the independent quality assurance supplier and passed on to the other suppliers (thebigword and Clarion). As well as having contacted existing linguists, thebigword has stated that it will recruit "[more than 3,500](#) language experts." A similar claim made by Capita never materialised, both with respect to numbers and expertise.

### **Trust us to deliver**

For the MoJ, thebigword is a worthy successor to Capita TI as [it provides](#) "significant added value," a key concept in public service privatisation. thebigword's incentive to entice linguists is the opportunity to work with thebigword's other clients. Calling its linguists "language experts" instead of "qualified linguists" evades the need to define the term and state whether or not they are either qualified, linguists, or both.

Part of the contract is for thebigword to provide training for interpreters, possibly through its [own International School of Linguists](#) (ISL) which has only provided a "Level 6 Diploma in *Community Interpreting*" since 2015, a qualification of its own devising, and separate from the [Diploma in Public Service Interpreting](#) (DPSI), the more common requirement. Interpreter education is clearly something else thebigword wishes to cash in on. Whether thebigword will be able to offer suitable training for rarer languages also remains to be seen.



thebigword is currently asking interpreters to register and sign 19 pages of small print of an interpreting services agreement before informing them of rates. It has also demanded that interpreters have a [valid enhanced DBS](#) (criminal record check) which must be renewed each year at their own expense; [it is very difficult](#) for self-employed interpreters to obtain such security clearance.

The [rates thebigword](#) is offering vary from a basic £18 an hour for standard interpreting requests and £24 for complex ones. In real terms, and in consideration of the precarious nature of the work interpreters undertake these rates remain incredibly low and uncompetitive. With its track record for poor rates and terms, many interpreters were not expecting much from thebigword. Many are reported to be unlikely to sign the agreement and another boycott is likely from the end of October.

#### ***Other issues***

No further details have been provided about the contract awarded to Clarion to provide deaf user services. Nonetheless, the [NUBSLI](#) has raised a number of concerns related to the impact of the contract on BSL interpreters and deaf people in court. These include the loss of experienced interpreters due to “unsustainable fees being offered”, lack of accountability as “it is more difficult for deaf people to complain about poor services” and concerns about the training offered.

The main novel aspect of the new framework agreement is independent quality assurance.

Arguably, this is already provided capably by the NRPSI. In an April letter, [former MoJ Minister Shailesh Vara](#) states that quality assurance arrangements are “one of our main priorities within the next generation of Language Services Contracts”.

The letter sets out the various tasks of the relevant supplier, to include independent assessment of skills, qualifications and experience, design and operation of a trainee scheme, management of the MoJ’s register of linguists, among others. How this is intended to work in practice and its expected utility remain to be seen.

Overall framework agreement 2.0 has considerable similarities to version 1.0 and the question of whether a framework agreement for language services is necessary in the first place remains unanswered but just as relevant five years on. The real differences remain to be seen after 31 October and whether these will lead logically to boycott 2.0.

Ends  
2016

#### **NRPSI active in MOJ Lobbying: 2019 to 2024**

NRPSI has been heavily engaged in advocating improvements in the handling of language services in 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>

**Summary of questions for HMCTS regarding language service delivery  
Asked by NRPSI as of 25<sup>th</sup> February 2021**

Please find below the questions which the National Register of Public Service Interpreters (NRPSI) ([www.nrpsi.org.uk](http://www.nrpsi.org.uk)) has been asking HM Courts and Tribunals Service (HMCTS) over many years and is still looking for answers.

NRPSI's only agenda as the independent not-for-profit regulator and register of professional spoken word public service interpreters is to ensure protection of the public, protection of the public purse and ultimately gain statutory recognition for those on the National Register; professional practitioners with accredited and checked IDs, qualifications, experience, clearances and who abide by the only Code of Professional Conduct specifically written for public service interpreting.

The questions in summary are below, with further back up material from page 3 to 10.  
For any further details do not hesitate to get in touch with [mike@nrpsi.org.uk](mailto:mike@nrpsi.org.uk)

**1.0**

**Use of the term 'Linguist' to define a public service interpreter**

1.3

Can HMCTS insist that agencies working on behalf of the MoJ follow MoJ protocols, to avoid obfuscation and mis-classifications, and drop the term 'linguist' when referring to spoken word public service interpreters, especially when related to and working on MoJ property such as the MoJ List. Every interpreter is a linguist, but not every linguist is an interpreter.

**2.0**

**Numbers of public service interpreters on the MoJ List**

2.3

In the public interest, can HMCTS let us know how many individuals, on average across 2020, are on the Complex-Written tier, Complex tier and Standard tier of the MoJ List. It is in HMCTS interests and the public interest for this information to be in the public realm ensuring transparency notwithstanding claims of commercial sensitivity.

**3.0**

**Numbers of NRPSI registered and regulated public service interpreters on the MoJ List's Complex-Written tier**

3.2

Can HMCTS let us know, in the public interest, how many on the MoJ's 'Complex-Written' tier do not have Level 6 public service qualifications.

3.3

Can HMCTS let us know how many NRPSI Registrants are on the MoJ List.

**4.0**

#### **Quality on the MoJ List**

4.5

Can we definitively confirm which definitions the MoJ List accepts for a language professional who is a public service interpreter; see from 1/ to 17/. Which of these definitions are for those who are recognised by HMCTS and on the MoJ List; see the full list of definitions from 1/ to 17/ on pages 5 and 6.

4.9

Can HMCTS tell us whether the MoJ List accepts someone who is on a Level 1 public service interpreting course (not even qualified yet – no 2/ on the List found on pages 4 and 5) as a public service interpreter in bail hearings and other Standard tier settings and does the MoJ List call this individual a language professional?

4.10

Can HMCTS tell us whether the MoJ List accepts those with Bachelor degrees in philology but with no public service interpreting qualifications as Complex tier public service interpreters?

4.12

Can HMCTS clarify whether the 'Certificate in Community Interpreting' mentioned as a Complex-Written qualification is the Level 3 public service interpreting qualification of the same name.

4.13

Can HMCTS confirm all those on the MoJ List have valid security clearances – even those who currently do not have a qualification but are enrolled on a Level 1 or other course.

**5.0**

#### **Suggestion for a regulator and register for levels 3 and 4; a National Register for Community Interpreters and Translators**

5.5

If HMCTS and the MoJ List does not recognise the role of the current National Register for Level 6 qualified interpreters, then why would the MoJ recognise a register for level 3 and 4. Can HMCTS confirm it recognises NRPSI as the only not-for-profit independent regulator and register of public service interpreters from Level 6 upwards.

5.6

To help further with reviewing how such a project focused on registering and regulating Level 3 and 4 public service interpreters might be developed, can HMCTS enable access by NRPSI to the MoJ List, in the same way the National Register ensures transparency through the open source access to the register itself as well as to the summary breakdowns published on an annual basis; see

[http://www.nrpsi.org.uk/downloads/1240\\_NRPSI\\_Annual\\_Review\\_6th\\_Edition.pdf](http://www.nrpsi.org.uk/downloads/1240_NRPSI_Annual_Review_6th_Edition.pdf)

**6.0**

### **Disciplinary and Professional Conduct Complaints, Processes and Protocols**

6.5

Can HMCTS confirm which code of professional conduct should those on the MoJ List follow.

6.6

Can HMCTS outline the disciplinary processes to be followed when there is a complaint against an interpreter on the MoJ List if this interpreter is not a NRPSI Registrant.

6.7

In the public interest, can HMCTS direct us to the findings of disciplinary and professional conduct hearings for those who are not NRPSI Registrants but have been engaged on the MoJ List for the last 3 years.

**7.0**

### **Debonair Debacle**

7.3

Can HMCTS be more specific about what new strengthened enhancements and new requirements have been introduced to improve oversight of contractors and subcontractors given those public service interpreters who supplied their service in good faith via Debonair and to the MoJ are still waiting for payment for their services from 2019 whereas the directors of Debonair, following liquidation, were almost immediately operating a new company.

**9.0**

### **CEO responsibilities and interests**

9.2

Can HMCTS advise how the MoJ contractually controls the fiduciary responsibility of management in profit-driven and dividend-delivering contractors to their shareholders. How does HMCTS ensure the number one priority of protection of the public through highest possible standard of language service is delivered by trained, qualified, experienced and fit for purpose spoken-word public service interpreters, safeguarding those who cannot speak English, be they victim, witness or accused.

## **Backing Documentation to the above questions**

**Please find a summary of the dialogue between HMCTS and NRPSI since Sept 2019**

### **1.0**

**Use of the term 'Linguist' to define a public service interpreter**

#### **1.1**

We first discussed this issue in the meeting on 24<sup>th</sup> September 2019. Thank you for your comments on 17<sup>th</sup> November 2020 agreeing to drop the term 'Linguist' from HMCTS usage when referring to those who are interpreting in public service settings engaged to operate on behalf of the MoJ through the MoJ List. You agreed to send through confirmation but this has not yet arrived.

#### **1.2**

Given the MoJ has agreed to this approach, then surely those contracted agencies working on MoJ property (such as the MoJ List) should also be instructed to desist from using a term which obfuscates; if a public service interpreter is needed for an engagement (or indeed a public service translator) then we should be clear in our communication. Words matter.

#### **1.3**

Can HMCTS insist that agencies working on behalf of the MoJ follow MoJ protocols, to avoid obfuscation and mis-classifications, and drop the term 'linguist' when referring to spoken word public service interpreters, especially when related to and working on MoJ property such as the MoJ List. Every interpreter is a linguist, but not every linguist is an interpreter.

### **2.0**

**Numbers of public service interpreters on the MoJ List**

#### **2.1**

On 24<sup>th</sup> September 2019 and in subsequent meetings, including the 17<sup>th</sup> November 2020 session, we discussed the numbers of people on the MoJ List, to be broken down by the three tiers operated by the Listing. There have been two reasons given for not sharing these numbers: commercially sensitive information; the numbers fluctuate too much to be able to give a definitive view.

#### **2.2**

From conversations with management at 'thebigword' through 2019 and with Sylvia Sinclair in March 2020 we believe the numbers to be something like 700 to 800 individuals on Complex-Written, 2,400 on Complex and 400 on the Standard tier. From our conversations, NRPSI believes around 3,600 spoken-word public service interpreters are on the MoJ List, engaged by HMCTS for MoJ public service interpreting tasks via a privately owned agency contractor and subcontractors.

### 2.3

In the public interest, can HMCTS let us know how many individuals, on average across 2020, are on the Complex-Written tier, Complex tier and Standard tier of the MoJ List. It is in HMCTS interests and the public interest for this information to be in the public realm ensuring transparency notwithstanding claims of commercial sensitivity.

## 3.0

### **Numbers of NRPSI registered and regulated public service interpreters on the MoJ List's Complex-Written tier**

#### 3.1

As discussed in September 2019, November 2019, March 2020 and again in November 2020, there are a number of individuals on the MoJ List's Complex-Written tier who do not hold Level 6 public service interpreting qualifications and there are of course a number of NRPSI Registrants who are on this tier.

#### 3.2

Can HMCTS let us know, in the public interest, how many on the MoJ's 'Complex-Written' tier do not have public service Level 6 qualifications.

#### 3.3

Can HMCTS let us know how many NRPSI Registrants are on the MoJ List.

## 4.0

### **Quality on the MoJ List**

#### 4.1

Attempting to define the quality of qualifications and experience on the MoJ List has been a key NRPSI concern, from the point of view of protection of the public as well as protection of the public purse. As we have experienced, there have been major disfunctions in the system such as the Tran case from 2019, the collapse of Debonair and the most recent exposure of the case of 'fake' interpreting from 2016 which has only come to light in 2021.

#### 4.2

Notwithstanding your assertions regarding the MoJ List's quality, there are concerns of further issues in the system which are still to come to light which are possibly causing negative effects on language service delivery in the courts.

#### 4.3

To reinforce your statements regarding existing quality measures, NRPSI believes greater understanding of what constitutes a MoJ List interpreter will help create a transparent view as to the state of public service interpreting in the court system; is it satisfactory, fit for purpose and delivering or is it in a Parlous state due to possible fundamental flaws in the creation and management of the MoJ List.

#### 4.4

Please note the below tiers of public service interpreters. These tiers are engaged by profit-orientated privately owned agencies working on behalf of public sector organisations, including HMCTS.

#### 4.5

Can we definitively confirm which definitions the MoJ accepts for a language professional who is a public service interpreter; see from 1/ to 17/. Which of these definitions are for those who are recognised by HMCTS and on the MoJ List; see the full list of definitions below from 1/ to 17/.

1. Bilingual with no language or public service interpreting (PSI) qualifications and no PSI experience; we believe individuals on this tier are not on the MoJ List. NRPSI has seen and shared with you the recruitment mailings by the MoJ's main contractor when recruiting bilingual speakers with no qualifications or experience for government engagements. We know the MoJ has categorically denied engaging with those who have no qualifications and are not yet enrolled on a course
2. Bilingual currently with no language or public service interpreting qualifications and no PSI experience but have signed up for a Level 1 (GCSE grade) course which lasts for two to four weeks; not yet achieved this basic foundation qualification
3. Bilingual with no language or interpreting qualifications but with PSI experience
4. Linguist with language A level (Level 3) but no public service interpreting qualifications
5. Linguist with language A level (Level 3) and with some form of Level 1 to Level 4 (A level standard) public service interpreting qualifications
6. Linguist with language degree level (Level 6 or above) but no public service interpreting qualifications; could be Bachelor in Philology or a Bachelor in Linguistics as well as a specific language
7. Linguist with language degree level (Level 6 or above) with public interpreting qualifications but does not abide by the Code of Professional Conduct
8. Interpreter with Level 3 or 4 community level (A level) public service interpreting qualifications but without PSI experience



9. Interpreter with level 3 or 4 community level interpreting qualifications with PSI experience (100 or less hours) but does not abide by the Code of Professional Conduct
10. Interpreter with level 3 or 4 community level interpreting qualifications with PSI experience (100 to 400 hours) but does not abide by the Code of Professional Conduct
11. Interpreter with level 3 or 4 community level interpreting qualifications with PSI experience (400 or more hours) but does not abide by the Code of Professional Conduct
12. Interpreter with 400 hours or more PSI experience and passed some of the required level 6 Diploma in Public Service Interpreting (DPSI) modules but does not abide by the Code of Professional Conduct
13. Interpreter with Level 6 Diploma in Police Interpreting (DPI) or DPSI Law or DPSI Health or DPSI Local Gov or equivalent degree level but with less than 400 hours experience and does not abide by the Code of Professional Conduct
14. Interpreter with Level 6 DPI or DPSI Law or DPSI Health or DPSI Local Gov or equivalent degree level with more than 400 hours experience but does not abide by the Code of Professional Conduct
15. Interpreter with 400 hours or more PSI experience and passed some of the required Level 6 Diploma in Public Service Interpreting (DPSI) modules and abides by the Code of Professional Conduct
16. Interpreter with Level 6 DPI or DPSI Law or DPSI Health or Level 6 DPSI (or equivalent degree level public service interpreting qualification) but with less than 400 hours experience and abides by the Code of Professional Conduct
17. Interpreter with Level 6 DPI or DPSI Law or DPSI Health or DPSI Local Gov or equivalent degree level with more than 400 hours experience and abides by the Code of Professional Conduct

#### 4.6

As you know NRPSI recognises these who are Registered and Regulated Public Service Interpreters (RPSIs); 15/, 16/, 17/ on the above List - as long as they can:

- Prove their identity
- Show hard copies of their qualifications
- Deliver hard copies of their claims for experience
- Have the requisite clearances
- Sign up to abide to the Code of Professional Conduct

4.7

See [http://www.nrpsi.org.uk/downloads/Qualifications\\_and\\_Experience\\_Criteria\\_for\\_Entry.pdf](http://www.nrpsi.org.uk/downloads/Qualifications_and_Experience_Criteria_for_Entry.pdf)

These are the pinnacle of the profession given they have Level 6 spoken-word public service interpreting qualifications, all the required experience, approved clearances and abide by the Code of Professional Conduct, ensuring they are subject to the Disciplinary protocols and processes of the National Register.

4.8

According to the MoJ's documentation, *'to work on a Standard Booking for a language other than a Rare Language....the language professional must be enrolled on a course or have partially completed a course for at least one of the qualifications in table 4...'* This Table 4 includes the 'Basic Interpreting Qualification' which is a two-to-four week course at GCSE level. As we understand it, Standard tier public service interpreters on the MoJ List are attending first hearings, bail hearings, legal argument, trial date setting and case management.

4.9

Can HMCTS tell us whether the MoJ List accepts someone who is on a Level 1 public service interpreting course (not even qualified yet – no 2/ on the above List) as a public service interpreter in bail hearings and other Standard tier settings and does the MoJ List call this individual a language professional?

4.10

Can HMCTS tell us whether the MoJ List accepts those with Bachelor degrees in philology but with no public service interpreting qualifications as Complex tier public service interpreters?

4.11

Other questions asked on 17<sup>th</sup> November 2020 regarding quality which have not yet been answered include:

4.12

Can HMCTS clarify whether the 'Certificate in Community Interpreting' mentioned as a Complex-Written qualification is Level 3 public service interpreting qualification of the same name.

4.13

Can HMCTS confirm all those on the MoJ List have valid security clearances – even those who currently do not have a qualification but are enrolled on a Level 1 course.

5.0

**Suggestion for a regulator and register for levels 3 and 4; a National Register for Community Interpreters and Translators**

### 5.1

First suggested to me by Guy Tomkins at the 24<sup>th</sup> September 2019 meeting and explored further by Sylvia on 10<sup>th</sup> March 2020, there is clearly a desire by the MoJ to contain what Guy described as the 'wild west' of lower grade public service interpreting. Unfortunately, we ran out of time to discuss this issue in our meeting on 17<sup>th</sup> November 2020.

### 5.2

But to summarise, as far as regulating and registering the level 3 and 4 community interpreting sector NRPSI recognises the requirement by the MoJ for interpreters who are not Level 6 DPSI or DPI; Level 3 or 4 community interpreting qualified interpreters to carry out specific jobs where the MoJ believes lower grade public service interpreting will not harm members of the public.

### 5.3

NRPSI can work with the MoJ to review the possibility of setting up an independent register and regulation-process for public service community interpreters.

### 5.4

Our aim would be to stabilise this 'Wild West' situation where bilingual speakers with absolutely no training are getting a gateway-entry into the ecosystem and then being used in public service interpreting roles for which they are not trained, qualified and do not have experience.

### 5.5

There is however one major stumbling block at this moment; if the MoJ does not recognise the role of the current National Register for Level 6 qualified interpreters, then why would the MoJ recognise a register for level 3 and 4. Can HMCTS confirm it recognises NRPSI as the only not-for-profit independent regulator and register of public service interpreters.

### 5.6

To help us further with reviewing how such a project focused on registering and regulating Level 3 and 4 public service interpreters might be developed, can HMCTS enable access by NRPSI to the MoJ List, in the same way the National Register ensures transparency through the open source access to the register itself as well as to the summary breakdowns published on an annual basis; see [http://www.nrpsi.org.uk/downloads/1240\\_NRPSI\\_Annual\\_Review\\_6th\\_Edition.pdf](http://www.nrpsi.org.uk/downloads/1240_NRPSI_Annual_Review_6th_Edition.pdf)

## 6.0

### Disciplinary and Professional Conduct Complaints, Processes and Protocols

#### 6.1

In our meeting on 17<sup>th</sup> November 2020, we ran out of time to discuss regulation, handling of complaints and professional conduct/ disciplinary activity, which we have been discussing since my first meeting with you Claire in September 2019.

#### 6.2

All those who are NRPSI Registrants and adhere to the Code of Professional Conduct:

([http://www.nrpsi.org.uk/downloads/NRPSI\\_Code\\_of\\_Professional\\_Conduct\\_22.01.16.pdf](http://www.nrpsi.org.uk/downloads/NRPSI_Code_of_Professional_Conduct_22.01.16.pdf) ). This is the only code written specifically for spoken word public service interpreters.

#### 6.3

Registrants then engage with the transparent and open protocols and processes of NRPSI's Disciplinary procedures:

([http://www.nrpsi.org.uk/downloads/NRPSI\\_Disciplinary\\_Framework\\_and\\_Procedures\\_22.01.16.pdf](http://www.nrpsi.org.uk/downloads/NRPSI_Disciplinary_Framework_and_Procedures_22.01.16.pdf) ).

#### 6.4

Findings are then regularly published for public scrutiny:

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

#### 6.5

Can HMCTS confirm which code of professional conduct should those on the MoJ List follow.

#### 6.6

Can HMCTS outline the disciplinary processes to be followed when there is a complaint against an interpreter on the MoJ List if this interpreter is not a NRPSI Registrant.

#### 6.7

In the public interest, can HMCTS direct us to the findings of disciplinary and professional conduct hearings for those who are not NRPSI Registrants but have been engaged on the MoJ List for the last 3 years.

## 7.0

### Debonair Debacle

#### 7.1

First discussed in September 2019, NRPSI has been concerned about the lack of oversight over the Debonair debacle when a subcontractor to MoJ's main contractor was allowed to engage and supply public service interpreters. Thank you for sending through by email on 22<sup>nd</sup> February 2021 the guidelines MoJ follows with regard to oversight of main contractors and sub-contractors. We discussed on 17<sup>th</sup>

November 2019 the nature of the new steps taken to improve ownership, accountability and responsibility and you said you would send these through to NRPSI to enable communication of these developments to those who actually deliver language services for the MoJ – the public service interpreters.

7.2

I note your email from 23<sup>rd</sup> February 2021 stating: *“Whilst there can never be an absolute guarantee that another Service Provider will not be able to meet its liabilities and go into (voluntary) liquidation, MoJ have further strengthened contractual requirements to mitigate the risk. These include an enhanced sub-contractor approval process by MoJ and increased governance and oversight of sub-contractors by the Service Provider, which include scrutiny of financial information and financial assurance activities.”*

7.3

Can HMCTS be more specific about what new strengthened enhancements and new requirements have been introduced to improve oversight of contractors and subcontractors given those public service interpreters who supplied their service in good faith via Debonair and tbw to the MoJ are still waiting for payment for their services from 2019 whereas the directors of Debonair, following liquidation, were almost immediately operating a new company.

**8.0**

## **Complaints from interpreters about treatment by privately owned agencies acting as contractors and subcontractors to HMCTS**

8.1

As you know historically NRPSI has been engaged with and attempted to build a relationship with the key agencies working on behalf of HMCTS; Mark Daley and I had regular meetings where we discussed complaints from interpreters and he acted in good faith to improve situations where there were evidenced issues to be addressed.

8.2

Unfortunately, this dialogue has been disturbed, not least by the impact of all parties handling the impact of the coronavirus crisis. However, notwithstanding many attempts to fix a remote meeting, Mark's last communication to me was on 14<sup>th</sup> September 2020 where he said he could not commit to a meeting.

8.3

When chased again in January 2021, Mark passed me to Leanne Gregg, Chief People Officer, who said should there be a requirement where collaboration is required, she will make contact.

8.4

On this basis I thank you for creating the new complaint procedure, received by email on 23<sup>rd</sup> February 2021. These are vital guidelines and I will ensure dissemination to public service interpreters as soon as is practicable.

9.0

### **CEO responsibilities and interests**

9.1

I was delighted to receive Julie's comments on 23<sup>rd</sup> February 2021 regarding the responsibilities of a CEO in a privately owned, profit driven agency and I too respect her views regarding CEO's obligations. To be clear, I did not say all privately owned businesses **only** consider or **only** prioritise profit for the benefit of their shareholders. I said there is prime duty and a legally binding fiduciary responsibility to build shareholder value, increase share prices and deliver dividends to the owners through profit maximisation. It is this that drove Adam Smith to say:

*"The interest of [business people] is always in some respects different from, and even opposite to, that of the public ... The proposal of any new law or regulation of commerce which comes from this order ... ought never to be adopted, till after having been long and carefully examined ... with the most suspicious attention. It comes from those ... who have generally an interest to deceive and even oppress the public"*

*Adam Smith, An Inquiry Into the Nature and Causes of the Wealth of Nations. Volume 1 of 2*

9.2

Can HMCTS advise how the MoJ contractually controls the fiduciary responsibility of management in profit-driven and dividend-delivering contractors to their shareholders. How does HMCTS ensure the number one priority of protection of the public through highest possible standard of language service is delivered by trained, qualified, experienced and fit for purpose spoken-word public service interpreters, safeguarding those who cannot speak English, be they victim, witness or accused.

Sept 2021 notes end

## **2023 notes again supporting the drive for independent regulation, insourcing, improving standards in public sector language services**

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\\_TaFt2l&feature=youtu.be](https://www.youtube.com/watch?v=b-3k_TaFt2l&feature=youtu.be)

The slides for this were also used at a NRPSI Town Hall on 28<sup>th</sup> 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:

**Current agenda NRPSI has for HMCTS: last updated 18<sup>th</sup> June 2024 and published on the news pages of NRPSI's website:** <https://www.nrpsi.org.uk/news-posts/Explore-the-latest-agenda-from-NRPSI-for-the-MOJ-click-here-to-explore-the-issues.html>

#### **Ensure the current booking system for interpreter engagements is working**

Currently, in mid- June 2024, there is widespread concern about tbw's newly introduced system causing distress for many interpreters given lack of work and loss of earnings.

#### **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 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

**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

**Ensure commercial agencies in the value system are regulated by an independent body**

Avoid ‘marking your own homework’ by engaging an independent authority to regulate contracted and off-contract agencies engaged by HMCTS

**Remote (online) interpreting and the use of tour guide systems in some courts were introduced without consultation and trialing the system, yet these modes of working impact interpreters' health and welfare**

What was the decision-making process in adopting these two new technologies?

By whom were the policies decided and who was consulted?

What tour guide system equipment was purchased, when, and for which courts? On whose recommendation?

What is the status of the Hearing Loop service that used to be available in all courts?

What consideration was given to:

- the actual working practices of interpreters and what they need in order to work effectively;
- interpreters' occupational health;
- the quality of the incoming audio feed interpreters require in order to do their work;
- minimum standards for technological hardware and sound quality;
- any existing minimum standards for remote interpreting and audio equipment and sound quality published by interpreter organisations;
- any measures to prevent hearing damage and voice strain;

Liaison with professional qualified interpreters who are regulated and registered would help ensure effective technology is deployed.

**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

**Baroness Coussins continues her lobbying for professionalism and qualified public service interpreters and translators, successfully creating positive changes in the Victims and Prisoners Bill.**

Victims' Code – The right to a professional: Thanks to tireless work by Baroness Coussins, UK Government has accepted amendments to the proposed 'Victims' Code' intended to set out and protect the rights of victims of crime.

“It is the principle that, where interpreting and translation services are needed by victims, as they have a right to expect under the victims' code, those interpreters and translators should be qualified and professional.”

Debate 31<sup>st</sup> January 2024

<https://www.nrpsi.org.uk/news-posts/Victims-and-Prisoners-Bill-31st-January-2023-click-here-to-read-the-debate-about-the-amendments-tabled-by-Baroness-Coussins-and-supported-by-many-peers.html>

Debate 16<sup>th</sup> April 2024

<https://www.nrpsi.org.uk/news-posts/Thanks-to-tireless-work-by-Baroness-Coussins-the-UK-Government-has-accepted-amendments-to-the-proposed-Victims-Code-intended-to-set-out-and-protect-the-rights-of-victims-of-crime-Click-here-for-more.html>

**Lord Bernard Hogan-Howe supports the call for independent regulation of public service interpreters and translators.**

*The UK Government has accepted amendments to the proposed 'Victims' Code' intended to set out and protect the rights of victims of crime. As Lord Bellamy said on 16<sup>th</sup> April 2024; “This strengthened wording makes it clear that victims are entitled to access interpreting and translation services from qualified professionals. 'Qualified' and 'Professionals' are the decisive words that the noble Baroness referred to. I hope that I have reassured her that we have heard and considered her arguments carefully and are committed to addressing their intent through the Victims' Code.” The full text of the debate is available at*

<https://hansard.parliament.uk/lords/2024-04-16/debates/5047DA2C-E4B3-422A-B9B9-114A936DF1DA/VictimsAndPrisonersBill>.

*In my speech on 31st January 2024, I fully supported this thrust to establish consistency in the engagement with language specialists who deliver the service required when someone does not speak English. This will ensure the criminal justice system achieves and maintains common standards, as well as accurate evidence and precision to establish truth and strengthens protection of the public. 'Qualified' and 'Professional' are indeed the decisive words and it is good this is established in law.*

*Where the standard of interpreters and translators is not established to a high and consistent level, there is a risk that the obtaining of evidence is damaged. This matters particularly for the police but also all involved in the criminal justice system. As Lord Bellamy said on 31st January 2024; “Obviously, the general objective is fairly self-evident: in the justice system, you must have a high standard of interpreting and translation”.*

*From my time as Commissioner and Head of London's Metropolitan Police Service I am proud to say we engaged with professional and qualified public service interpreters who had been independently accredited: their qualifications, experience and right to work checked by the voluntary, not-for-profit National Register of Public Service Interpreters ([www.nrpsi.org.uk](http://www.nrpsi.org.uk)). This organisation also manages a most effective complaints and professional conduct process with robust appeals protocols. This is based on a thorough Code of Professional Conduct, which is transparent and effective, and is a major benefit in engaging practitioners through the regulator, treating qualifying practitioners as professionals with their own independent regulatory body.*

*It is no longer a case of the criminal justice system ‘should’ support regulation and registration through an independent body, but it is time that the criminal justice system ‘must’ engage practitioners through an independent regulatory body. I am delighted to see the launch of the National Register of Public Service Translators ([www.nrpst.org.uk](http://www.nrpst.org.uk)) which is now sitting alongside the National Register of Public Service Interpreters.*

*The question is now not ‘why should we have an independent regulator for interpreters and translators who are engaged by the criminal justice system’, but ‘why don’t we have an independent regulator for interpreters and translators who are engaged by the criminal justice system’.*

*ENDS: dated 23<sup>rd</sup> April 2023*

Lord Bernard Hogan-Howe joined the South Yorkshire Police in 1979, becoming District Commander of the Doncaster West area, as well as obtaining university qualifications in law and criminology.

In 1997, he transferred to Merseyside Police as Assistant Chief Constable for Community Affairs, moving on to area operations. He then joined the Metropolitan Police as Assistant Commissioner for personnel, before being appointed Chief Constable of Merseyside Police.

After two years as an Inspector of Constabulary, Hogan-Howe was briefly Acting Deputy Commissioner of the Metropolitan Police before being appointed Commissioner in September 2011.

## 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'.

### 11<sup>th</sup> 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.'*

### 18<sup>th</sup> 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.'*

**25<sup>th</sup> 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.'*

**2<sup>nd</sup> 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.'*

**11<sup>th</sup> 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.'*

**13<sup>th</sup> 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.'*

**27<sup>th</sup> 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.'*

**19<sup>th</sup> 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.'*

**25<sup>th</sup> 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%2BQQnDRg%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.'*

**14<sup>th</sup> 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?'*

**25<sup>th</sup> 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.'*

**27<sup>th</sup> 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.'*

**1<sup>st</sup> 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.'*

**3<sup>rd</sup> 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.'*

**21<sup>st</sup> 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?'*

**On 14<sup>th</sup> July 2024, Mike Orlov called for 'Change in public sector language services - give voice to the voiceless'**

<https://www.linkedin.com/pulse/change-public-sector-language-services-give-voice-voiceless-orlov-chr0e/?trackingId=zcWLSXv3Q3aLTEsZNA9C4Q%3D%3D>

*Between 2010 and 2024, given the lack of desire by an unbroken chain of Conservative administrations, NRPSI has struggled against the odds to see any changes in language services in the public sector. However, there have been some positive developments in recent years; see <https://www.nrpsi.org.uk/news-posts/As-we-enter-a-new-stage-of-advocacy-and-lobbying-with-the-new-government-it-is-useful-to-remind-ourselves-of-the-journey-we-have-been-on-since-the-start-of-Covid-click-here-to-see-more>. With a Labour government we are all hoping for acceleration in changes to how language services are handled by public sector organisations, ensuring greater protection for the public – those who do not speak English but need help with public sector organisations.*

**A further article on 17<sup>th</sup> July 2024, entitled 'Time to improve public sector language services' by Mike Orlov**

<https://www.linkedin.com/pulse/time-improve-public-sector-language-services-mike-orlov-9qshe/?trackingId=zcWLSXv3Q3aLTEsZNA9C4Q%3D%3D>

*One of the biggest Tory mistakes since 2010 has been the lunge towards outsourcing many services, leading to a race to the bottom fueled by chasing lowest cost without focus on quality. This lunge has encouraged the drive towards greater profits from public funds in to the hands of private companies, pushing up annual dividends and lifting shareholder value at the expense of services to the public and squeezing income for professionals. It is time to put public service back at the heart of government investment across the UK, reaching in to every community notwithstanding ethnic or religious backgrounds. Abandoning public sector language services to the vagaries of outsourcing without effective protection of standards has led to avoidable deaths in the NHS where inadequate pseudo*

*interpreters have been engaged in life threatening situations and to turmoil in the criminal justice system.*

*Now is the time to follow through on the findings of the 1993 Runciman Royal Commission on Criminal Justice where it 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'. The National Register of Public Service Interpreters (NRPSI) was launched 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.*

Always worth skimming the news pages of NRPSI's website to keep informed and up to date.

Visit <https://www.nrpsi.org.uk/news-and-links.html>

Just a few articles of value:

May 2023 Newsletter for Registrants regarding the terrible state of the current framework and the positives in the proposed new framework due to be implemented in October 2025

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

November 2023 Newsletter for Registrants – many useful editorial pieces including a review of the 'Board Campaign' where Non-executive Board Members voice their thoughts about the future of public service interpreting and translation

<https://nrpsi.cmail19.com/t/ViewEmail/t/DBB3EB8A4F34E4022540EF23F30FEDED?alternativeLink=True>

Pro Form Letter: for Registrants to send to their MPs gaining wider exposure for the Manifesto

<https://www.nrpsi.org.uk/news-posts/Send-this-template-letter-to-your-MP-either-by-post-or-by-email-lobby-for-their-support.html>

See a PDF of the PowerPoint presentation which NRPSI has shown to many in public sector environments over the last two years; an argument against outsourcing through agencies and a clarion call for insourcing

<https://www.nrpsi.org.uk/news-posts/Since-June-2022-NRPSI-has-been-making-this-presentation-to-many-working-in-public-sector-organisations-arguing-against-outsourcing-click-here-to-read-more.html>

Institute for Government support for insourcing

<https://www.nrpsi.org.uk/news-posts/Government-outsourcing-when-and-how-to-bring-public-services-back-into-government-hands-click-here-to-read-more.html>

PI4J Manifesto

<https://www.nrpsi.org.uk/news-posts/Read-the-latest-Manifesto-driving-lobbying-and-advocacy-for-professionalism-and-recognition-of-your-skills-knowledge-and-experience-click-here-for-more.html>

Mailer to NRPSI website users, who set up a free to use visitor account and accept information sent to them

<https://nrpsi.cmail19.com/t/t-e-eduott-l-u/>

DPSI Online, a training company using OFQUAL regulated courses through ICQ, outlines the way forward for those interested in professional public service interpreting

<https://dpsionline.co.uk/understanding-interpreting-qualifications/>

There are many more news pieces which will underline NRPSI's independence from any commercial agencies, independence from any political pressure from public sector organisations, and commitment to improvements in standards in language services for those who need it most; those who cannot speak English and need access to public services.

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

### **NHS suggests NRPSI first**

Interestingly, the MoJ will halve this experience criteria to 200 hours following their review when the new framework comes in to operation, supposedly in October 2025, linked of course with also having a level 6 DPSI or equivalent PSI vocational qualification.

### **Criminal Justice System suggests NRPSI first**

Also interestingly the NHS's Guidance to Commissioners also quotes NRPSI Registrants as the first port of call when interpreters are needed, but this sadly not mandated. A review of activity with the NHS would warrant document no less in depth. 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>

See page 8 of this document from the Criminal Justice System advice regarding sourcing interpreters: <https://zakon.co.uk/admin/resources/downloads/criminal-investigations-use-of-interpreters-v1.0-ext.pdf>

#### *The National Register of Public Service Interpreters (NRPSI)*

*This page tells criminal investigators in Immigration Enforcement (IE) and suitably trained and accredited criminal investigators within the Home Office what minimum accreditation is required from interpreters used to undertake criminal interviews and other criminal procedures.*

*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).*

*The NRPSI provides and maintains the voluntary register for the interpreting profession. It ensures required qualification standards are met, the quality of interpreting is defined and maintained through a Code of Conduct and that access to a database of professional interpreters is freely available for all. Further details can be found on the NRPSI website.*

*If the services of a non-NRPSI registered interpreter are used, for example if no NRPSI registered interpreter was available, the rationale behind this must be clearly documented.*



**June/ July 2024 Pressure on thebigword for improved remuneration, terms and conditions following disastrous launch of new app**

On 9<sup>th</sup> July 2024, some 40 interpreters had a series of face to face meetings with thebigword management, supported by colleagues outside the building, complaining about a series of issues which have built up over many years, culminating in the collapse of the new booking system

'Dear Colleagues thank you to those that came today and became part of our community - some baby steps in the right direction. My colleague and I used our slots to put forward the joint concerns of the 461 colleagues in our WhatsApp community and get some updates - we have managed to get them to agree to a meeting regarding rate proposals. Join our community to have a say!'

Continued pressure on remuneration, terms and conditions will create a better environment for all those interpreters serving the public.

10<sup>th</sup> July 2024