NZSL Interpreter Registry Consultation

developed for the

NZSL
New Zealand Sign Language
Board

by

FITZGERALD
&ASSOCIATES

July 2018

Acknowledgements

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Executive summary

There is strong and nearly unanimous support for the development of a New Zealand Sign Language (NZSL) interpreter registry among interpreter coordinator agencies, government agencies[1] as well as Deaf people and, in a previous survey, from interpreters. The enhancement of standards and consistency in interpreting is seen as needed and normal in the development of most professional groups.

There are several areas of agreement on registry development. For example, there is general agreement that the components of the registry (assessment, professional development and complaints) are appropriate. There was also a widespread belief that the registry should not compromise access to interpreters for Deaf people. Many noted that the registry must not create any unintentional consequences in access to interpreters. Most thought that it was sensible to take up to five years to establish the registry and resolve any arising issues early.

A significant majority of interpreter coordinator agencies, and nearly all government agencies hold the view that a levy is not a feasible funding solution, as additional fees will need to be charged to raise the registry funds. Two interpreter coordinator agencies state that they would not be able to absorb the extra cost, while the third stated that they could target funding only from government agencies so that private individual users would not have to pay any more than currently. Instead, most people preferred that a Government appropriation should be sought by the Office for Disability Issues (ODI). Government funding will mean that no organisation or individual service user will have to pay more than they currently do.

The high cost of interpreting services was frequently commented on by government agencies, and many noted that they have to use freelance interpreters to save costs. Interpreter users in the education sector, including primary, secondary and tertiary levels, found the need for interpreters to be high but the cost of interpreters extremely challenging to meet, and therefore any further cost increase would be unwelcome.

Most interpreter coordinating and government agencies were of the view that the registry will be most cost effective if it is placed within another organisation and is not completely stand-alone. Most representatives who were familiar with the Deaf sector supported the idea of building the capacity of the Sign Language Interpreters Association of New Zealand (SLIANZ) to undertake the role. Deaf community members were more mixed in their opinions. While many argued that the registry would be well placed within SLIANZ because of their cultural and linguistic expertise, a significant number also thought a more independent body is needed.

Deaf people were also mixed in their view of where the complaints body should be located. Many think it should be independent because of the need to have a primary focus on the

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[1] The term government agencies used in this report refers to a range of agencies that include the Deaf Education Centres, DHBs, TECs, and variety of Ministries, as well as NZVIS and the NZ Society of Translators and Interpreters.

Deaf community's needs. Some people were of two minds but many also thought SLIANZ was the logical choice to manage complaints.

All participants said they would prefer to use registered interpreters if they were available. Many government agencies and Deaf people noted the lack of interpreters, mostly in areas outside of Auckland. Unqualified interpreters or communicators, in particular, are used frequently and there was significant support for them to be systematically trained to become qualified interpreters over the five-year transition period. While a significant number of Deaf people were opposed to their inclusion, many Deaf people outside of Auckland thought these should be part of the registry, even as associates, in order to track their progress and limit their scope of work. There was a strong plea among Deaf and government agencies to make interpreting training accessible outside Auckland.

SLIANZ consulted with its members at its AGM July 7th 2018 and have provided their views on the registry and whether or how they might alter their service to accommodate it. They acknowledge the many advantages and disadvantages of an independent registry and managing the registry themselves. In particular, an independent body may be perceived as being more impartial, is better positioned to encourage government compliance and would allow SLIANZ to focus on their core functions of advocacy and professional development. On the other hand, a SLIANZ managed registry would allow greater input from interpreters, enable strong connections with the Deaf community and provide a stronger financial base for SLIANZ. The need is recognised for internal separation of the registry and significant change in the organisation, if SLIANZ was to manage the registry. SLIANZ poses a number of questions for further registry development.

Implications for the NZSL Board

Sourcing funding

Interpreters cannot pay the full proposed amount of the registry and there is a shortfall of around $150,000 a year, out of a total cost of around $200,000 a year. The strong response from government and related agencies such as the Deaf Education Centres and District Health boards, is that a government grant should be sought by ODI.

If that option is not available, there are two options for the NZSL Board. Firstly, the cost of the registry may be greatly minimised so that payments cover the cost of bare minimum functions. A second option would be to introduce a levy which would need to either be absorbed by current interpreter booking agencies, or an additional charge made.

Because the majority of both interpreter coordinator and government agencies are opposed to a levy, resistance can be expected to any increased fees required to fund the registry. Consequently, there would need to be a significant promotion undertaken on why the levy was needed and how it could be simply administered. Interpreters would also need to support the move by contracting through the interpreter agencies wherever possible.

In order to seek government funding, a business case to Government on reasons to establish the registry would need to include the fact that there has been market failure in providing services to the Deaf population, with Deaf needs remaining unmet. In particular, interpreting services are of variable quality and have not been able to be sufficiently well managed by the market. The Deaf sector is unable to provide the registry on an ongoing basis on its own. Deaf people need interpreting as a matter of human rights[2] and personal safety, as well as for individual productivity and independence. The social and economic benefits of Government ownership or contracting of the registry would outweigh the relatively low costs. The Government needs to accept some accountability for the low social and economic outcomes experienced by Deaf people.

An approach to Government that showed a clear workforce strategy for the whole Deaf sector, including its future size and hallmarks, would show how social and economic outcomes for Deaf people can be improved with more skilled staff.

Registry location

Government agencies suggested that the registry be based with another organisation. While there is some concern among the Deaf community, there is also some significant support for locating the registry within SLIANZ. This is mostly for reasons of efficiency, as SLIANZ already provides interpreter mentoring, training and support. However, there are significant numbers of Deaf people who see a conflict of interest between the two agencies and many

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[2] United Nations Convention on the Rights of Persons with Disabilities

Deaf people argue that if the registry was within SLIANZ (or SLIANZ within the registry) some role conflicts would need to be managed.

If a tender is called to set up the registry, and SLIANZ is both interested and selected, care will need to be taken to ensure some separation from their general focus on support and advocacy for interpreters. If SLIANZ is not interested or selected, then another agency will need to be set up and care needs to be taken to ensure the two organisations work together well. Either way, SLIANZ is eager to be closely involved to ensure the registry system works both for interpreters and the Deaf community.

There is significant understanding among government agencies that the existing complaints process operated by the Health and Disability Commissioner needs to make itself accessible for Deaf consumers. There is also a significant group of Deaf people who understand the need for independence of the complaints body but there is agreement that it must have Deaf cultural and linguistic knowledge. Some connection between the registry, SLIANZ and the complaints body is needed to make sure there is efficiency in the process of managing complaints. Discussions with the Health and Disability Commissioner are needed to see if this is possible.

User education

User education on the registry, including complaints and risks of not using registered interpreters should be built into the registry system.

Use of unqualified interpreters / communicators

Unqualified interpreters and communicators are a remaining challenge for interpreting services as Deaf people and government agencies feel forced to use them when there are insufficient qualified interpreters are available or the cost is higher than can be borne. It is likely to be challenging to make registration compulsory for all interpreting assignments. Further discussion is also needed between the unqualified interpreters and communicators, the registry and the current undergraduate training providers to see if a path forward can be found.

1 Introduction

Two reports by Fitzgerald and Associates were commissioned by the NZSL Board entitled 'A Review of New Zealand Interpreting Standards' (2017) and 'NZSL Interpreter Registry Design' (2017).

The first report identified that there is a significant need for a NZSL interpreter standards regulation system to be established in New Zealand to a) enable the Deaf community to access professional interpreter services of a consistent and high quality standard suitable to their requirements, and b) ensure that NZSL interpreters and services that employ interpreters are supported to provide a high-quality interpreter service throughout New Zealand.

The second report outlined requirements for the various activities and outcomes of the registry, possible structural design options, and costed a possible service, recommending that either government monies or a levy on interpreter fees be considered as a means to pay for the shortfall expected by the establishment of the registry.

This report is in response to the NZSL Board's decision to gain feedback from a wide group of interpreter coordinators, government agencies that use NZSL interpreters as well as Deaf community members on key suggestions and questions in the second report, in particular identifying the level of support and concern for:

1) the registry and its functions,
2) funding options - either through an ongoing government appropriation or through a levy on all interpreting fees, collected from interpreter booking agencies,
3) only using registered interpreters.

The report is organised in sections of stakeholders' feedback from interpreter coordinator agencies, government and related agencies (referred to as government agencies), the Deaf community and SLIANZ.

2 Purpose

The project aimed to:

1. Inform key stakeholders of the registry development, its design features and purpose in improving quality services.
2. Identify levels of support or concern for the idea of the registry, the use of only registered interpreters, and either seeking government funding or implementing a levy through interpreter coordinator agencies to pay for the shortfall expected in the registry.
3. Provide advice to the NZSL Board on how to progress the registry given these responses.

3   Methodology

The consultation process required a qualitative approach to obtain the views of key stakeholders. Interviews were held with nine representatives of three interpreter coordinating agencies and 56 people from 40 government agencies, identified in Appendix 1. In addition, 50 members of the Deaf community attended community meetings or participated in an online survey and five members of the SLIANZ Executive participated in an online discussion.

Participants were interviewed face to face by either Tricia Fitzgerald or Adele Carpinter, who undertook Wellington interviews and provided interview notes, or Catherine Greenwood, who conducted Deaf discussions and provided interview notes.

Focusing on the largest organisational users of interpreter services, targeted government and related agencies were identified with ODI. Relevant personnel with responsibility for organising or paying for NZSL interpreters were identified through ODI contacts, central government agencies or through direct phone calls. All agencies were offered face to face meetings in Wellington or Auckland. Representatives of District Health Boards (DHBs) and tertiary providers did not have time to go to Wellington for group meetings, but they were willing to attend online meetings or reply to our questionnaire and discuss with the lead consultant.

Deaf community meetings and online opportunities were advertised in the Deaf Aotearoa weekly newsletter three times, in five separate Facebook groups, on the ODI website, plus through personal invitations. All written information was provided in Plain English and in NZSL online. Responses were welcomed in both writing or NZSL. All Deaf discussions were conducted by Catherine Greenwood, a Deaf consultant fluent in NZSL.

Questions to each of the groups were developed in consultation with ODI so that a consistent approach was provided for all meetings. Approaches were also discussed and amended by the three consultants.

Table 1: Stakeholder participants

Stakeholder	Numbers of people interviewed	Number of organisations represented
Interpreter Coordinating Agencies	9	3
Government and related agencies	56	40
Deaf community	50	
Facebook group	17	
Online survey	6	
Hamilton	1	
Auckland	13	
Whangarei	13	
SLIANZ	5	

Most government agencies were interviewed over an hour period and Deaf communities over a two-hour period. Online discussions and a survey with the Deaf community were held over two weeks. The SLIANZ Executive was interviewed online and was deliberately made the last group interviewed so that others' views could be shared with them.

4 Perspectives

4.1 Interpreter coordinating agencies

Representatives from the three existing NZSL interpreter coordinating agencies discussed the registry and its funding options. Discussions were also held with the Video Interpreting Service and its funder.

All agencies supported the idea of the registry and the need to enhance interpreter consistency and standards.

However, there were different ideas as to the ideal funding sources. The largest and smallest coordinator agencies thought that any levy would require increases in fees which would not be acceptable for their customers. Absorbing the cost was not an option for them. One also noted that it was expected to increase administration costs with annual accounting and would not be feasible. Both thought that Government should fund the registry.

> *New uncontestable funding for this has to be found – we need a strategy to achieve this (interpreter coordinator agency).*

The same two interpreter agencies strongly supported the idea that the capacity of SLIANZ could be built up to provide the registry. Providing a separate registry for a very small number of interpreters did not seem a sensible move to them. They argued that interpreters should have robust discussions on this and their views should be considered seriously.

A small number of interpreter coordinating agencies, SLIANZ, Deaf Education Centres and tertiary providers already provide some training, mentoring and informal assessment for interpreters and that these functions should be enhanced.

> *We need to build the capacity of SLIANZ (interpreter coordinator agency)*

In contrast, one interpreter agency strongly supported the idea of a levy as a self-sustaining way for interpreters to invest in their professional standards through the registry. It was argued that a levy should allocate training funding, a large portion of which a responsible agency should already be investing in their interpreter contractors. In this way, a system where all agencies pay the levy and then can apply for funding for the activities they do and link to the identified goals of the registry means that an agency should get a large portion of the funding back when they provide professional development. These representatives thought it would be possible to target a levy on larger organisational users, such as government, so that private individuals did not have to bear any price increases.

> *Agencies should already be budgeting for professional development as a way of advancing their level of service. A levy simply uses that funding in a more co-ordinated and productive way for broader benefit (interpreter coordinator agency).*

4.2   Organisational Users: Government and related agencies

4.2.1   Overall support for registry

There is universal support among government agencies for enhancing the quality of NZSL interpreting. There is significant support for doing this through the establishment of a registry.

> *Yes, we need quality assurance (Government agency)*
>
> *Health is so important to get accurate interpretation (DHB)*
>
> *It's a good idea. It could maintain the professional life of the interpreter (Deaf Education Centre)*

In contrast, one government agency thought there may be other mechanisms to implement the registry functions identified. For example, interpreter agencies' senior personnel observing newer recruits may be able to meet assessment and mentoring requirements. Similarly, two agencies noted that teachers have a simpler system, without assessment panels. They receive a practicing certificate after one year's experience and demonstrate competence to a senior teaching professional onsite, on a regular basis to retain their certificate. However, it was noted that NZSL interpreting is hard to provide ongoing mentorship on one site. Many people noted that while informal arrangements have been in place, for example mentoring in SLIANZ, these systems are not operating consistently enough to provide the quality of interpreting service that Deaf people desire. They need to be formalised.

Registry functions

There is significant agreement that a post-qualification assessment and ongoing commitment to professional development (training and mentoring) as well as enhancing complaints system access are important components of continuous quality improvement.

> *Yes, they align with other parts of the education sector (government agency)*
>
> *Without mentoring, how do you process ethical dilemmas? government agency)*

A small handful of government agencies (DHBs and tertiary providers) said they were clear on how contracted interpreters were already performing (from senior interpreters and Deaf feedback), but the majority of government agencies said they did not know how to judge the performance of NZSL interpreters.

One government agency noted that the registry also needs to ensure soft skills such as punctuality and courtesy were built into interpreter practice. Police vetting will also be needed according to one government agency.

A few agencies noted that there is already a complaints body provided by the Health and Disability Commissioner and that this should be made accessible for the Deaf community rather than building another. One agency noted that a better feedback loop between operators and users of interpreter services is needed to ensure the system is working.

There was widespread support for the registry development to take the time it needs to set up well. In particular, if there was any unintended consequence, such as reducing interpreting access in the region, this could be countered in the design of the registry.

> *There needs to be a lengthy transition to ensure there are no unintended consequences from this development and give people plenty of time to adjust to the new way of working (DHB)*

One government agency thought the registry would require a legislative foundation, such as an amendment to the NZSL Act. Another agency noted that the Language Assistance Services Project registration framework will not require legislation, however. ODI also noted that legislative changes are not required for the new registry to exist.

Language Assistance Services Project

Central government agencies are working together under the leadership of the Ministry of Business, Innovation and Employment (MBIE) and the Department of Internal Affairs (DIA) on a multi-year work programme, (the Language Assistance Service Project) to improve the quality, consistency and coordination of spoken language assistance services provided across the New Zealand public sector.

National Accreditation Authority for Translators and Interpreters (NAATI) assessment systems are likely to be used by the Language Assistance Services Project. One project team member noted that interpreter booking agencies will likely be responsible for ensuring that adequate professional learning and development is in place within spoken languages.

While spoken language interpreters' assessments may be funded by government, as advocated by the Language Assistance Services Project, spoken language interpreters will likely have to fund their own professional learning and development (i.e. training and mentoring). NZSL registry representation is sought as a part of the project, to ensure both systems are well aligned.

4.2.2   Use of registered interpreters and interpreter availability

A large majority of government agencies users agreed they do or would use only registered interpreters.

However, some agencies said it would be hard to agree to only registered interpreters because of poor supply in some areas and Deaf personal preference. One government agency suggested including unqualified interpreters within the registry, providing them with ongoing professional development, tracking their career pathways and being transparent about the limitations of the personnel.

> *(A Deaf person) should be able to employ the person they trust (government agency)*

> *(An interpreter booking agency) uses two communicators at times (DHB)*

One of the greatest concerns about interpreters is that their lack of availability, even in Wellington and Auckland but especially in the regions outside the main centres.

> *The registry must not reduce funding for or access to interpreters (multiple government agencies)*
>
> *You cannot compromise access (tertiary provider)*
>
> *Doctors want (the interpreter) onsite, so locals are required (DHB)*

Several agencies said that if the registry tightened the supply of interpreters, then the development of the registry should be reconsidered. Availability of interpreters, especially in the regions, is already very challenging. ODI holds the view that requiring registration could help the regional situation by ensuring that registered interpreters get enough work.

4.2.3   Registry structure and location

The recent second report on the registry recommended that it be an independent body, with its functions including control of registration requirements, and making sure that interpreters meet their assessment, training and mentoring responsibilities, as well as address complaints. The registry would focus on interpreters meeting the needs of their service users, and this would leave SLIANZ free to focus on support and advocacy for interpreters.

There is a minority support among government agencies that the registry should be an independent body as suggested in the previous registry report. The majority of people agree with the two interpreter coordinator agencies, seeing a separate structure as somewhat wasteful within a very small sector, and prefer to use an existing structure that could include the registry. One government agency noted that a stand-alone registry was not viable for such a small workforce. Many government representatives had insufficient knowledge to provide guidance beyond the general principle of not creating another entity.

A majority of agencies that were familiar with the NZSL interpreting sector (e.g. DHBs and tertiary providers) prefer a rebuilt and refocused SLIANZ that has multiple arms (i.e. support and advocacy/ monitoring and controlling). The advantage of this is that SLIANZ is already involved in many of these activities and can be built up. The distinction between controlling quality and supporting interpreters was not clear or useful in the mind of many participants.

> *Would an interpreter belong to two organisations – the registry and SLIANZ? (DHB)*
>
> *Could we link with another registry (e.g. spoken language)? (DHB)*

One other option to be further explored is that the registry could be located with other spoken languages. The Language Assistance Services Project has not yet set its future structure but there is a possibility the registry may sit within the new service. Representatives from ODI or the registry have been welcomed to the project to ensure the two services are aligned.

If SLIANZ submitted a tender to manage the registry and was selected, SLIANZ would need to significantly change from a voluntary organisation to manage staff and commercial contracts and manage potential conflicts in role. They would need to have a registry (monitoring or policing) arm as well as providing advocacy and support for interpreters.

Two participants from government agencies queried who the board of the registry will be and noted that this was key for ensuring interpreters and the Deaf community held control of the service. Several participants noted that any registry board should include interpreters and one government agency also thought the board would need to include Deaf consumers, government representatives, and academics.

4.2.4   Funding and costs

Government agency participants generally prefer the idea of generating money from central government rather than exacting a levy on all or even some interpreting assignments undertaken through an agency. In this way, extra costs are not passed onto organisational or individual users or customers of interpreting services.

Government agencies' general operational budgets tend to be used to pay for interpreter fees. Imposing a levy was expected to reduce access to interpreters, because the overall funding may not increase and therefore, less volume of interpreting assignments might be funded. An appropriation from individual agencies is unlikely to be possible because of the detail required to allocate funding fairly. ODI was seen by the vast majority of agencies as the ideal organisation to bid for central government funding. However, two DHB representatives thought the cost of the registry could be relatively easily spread across DHBs.

Two government agencies suggested that a business case be put to Government for developing policy around NZSL provision and funding the registry. The business case should focus on the market failure that has left Deaf people with high social and economic costs of exclusion. Deaf people need interpreting as a matter of human rights and personal safety, as well as for individual productivity and independence and the private sector has difficulty in meeting these needs.

One government agency wondered how the registy's role should be also seen in relation to a workforce strategy for the whole sector, including the monitoring of supply and demand and enhancing recruitment and retention. An approach that showed a clear workforce strategy for the Deaf sector, including its future size and hallmarks, was seen as potentially valuable for a Government that is seeking more effective outcomes for the population.

The Ministry of Health noted the work currently underway on System Transformation. This is unlikely to gather all disability funding into one programme but it is hoped that additional funding may be available within Workbridge's Support Funds, which may ease the existing constraints on funding interpreters.

If it was difficult to get extra government money because there are so many requests on Government resources, there might still need to be a levy (e.g. 4% of every interpreting job is collected once a year from interpreter agencies) to pay for the registry. It is clear, however, that there will be some resistance from government agencies to paying additional fees. One government agency thought interpreters should pay the full cost of the registry (around $200,000 a year), like all other professions.

> *The government should fund the whole registry or at least the shortfall (tertiary provider)*

> *There needs to be more money for NZSL support – it is an official language (tertiary provider)*

> *The end user should not have to pay for this (tertiary provider)*

> *A levy may have a high impact on NGOs or private users of interpreter services (government agency)*

> *My overall concern is (that we will be) paying more and not getting a better service (DHB)*

> *There is no justification to levying (interpreting) customers. Professional groups should pay for their registry (government agency)*

There were no government agencies that supported the idea of a levy.

Interpreting cost

The high cost of NZSL interpreting was mentioned as challenging in almost all interviews, despite the stated commitment to meet Deaf interpreting needs.

> *There's a risk of not using interpreters at all if prices go up – they are so expensive (DHB)*

> *If costs go up, we would want further discussion (government agency)*

> *Increased costs for interpreters might deter (them) from working in the field (government agency).*

Education provider views

Education providers at all levels (primary, secondary and tertiary) noted that they needed to provide interpreters for Deaf students at all times but are highly constrained in funding. The funding of interpreters for education was considered essential, but in practice, were seen as very expensive with existing funding levels insufficient to meet Deaf needs.

Tertiary

While some tertiary providers use interpreter agencies to obtain interpreters, the majority find and contract individual freelance interpreters directly, in order to contain costs. Several mentioned Workbridge funding and its limits. Most also use the tertiary education Equity Funding, but all noted the lack of adequacy to cover interpreting fees for Deaf students. There was some concern that an additional levy would raise the price of all interpreters, including freelancers.

> *There's an unfair load on polytechnics (tertiary provider)*

> *One student for one semester can cost us $50,000 in interpreting fees – any increase in cost will have a huge impact (tertiary provider)*

Several tertiary providers suggested that many Deaf interpreter users are unaware of the cost and limits of interpreting funds. For example, one Deaf person on a course, used their entire lifetime support fund allocations before the end of the first term. There were significant current and ongoing negative consequences for that person.

Some tertiary providers thought a levy could be potentially subsidising the tertiary sector, as most cannot afford to go through interpreter agencies and therefore would not be contributing to the registry.

Primary/secondary

The Deaf Education Centres also noted their challenges in the funding model. They cannot afford to book interpreters through the interpreter agencies and are already spending several hundreds of thousands of dollars on interpreting each year. They agreed that they might see themselves as interpreter booking agencies for schools.

Funding systems (e.g. Ongoing and Reviewable Resourcing Scheme or ORRS and Workbridge) were seen as bureaucratic, uncertain and inadequate to meet needs. NZSL@School is a new source of funding but is also limited. Current negotiations with the Ministry of Education (MOE) are underway to identify the appropriate level of funding for the DECs, including for interpreting.

4.2.5   Booking systems

Testing the levy concept, participants were asked whether they would use interpreter booking agencies which could provide a means to collect the levy. While booking systems were not the focus of the interviews, so many comments were made about the booking service, that some of these comments have been included in this report.

> *We would use interpreter agencies if cost was not an issue (tertiary provider)*

> *Costs are more manageable with freelancers (Deaf Education Centre)*

> *Booking fees are extraordinary – you can pay a booking fee for each day of a three-day booking (Government agency)*

Several agencies noted that New Zealand needs a more efficient interpreter booking system where the interpreter coordinating agency has access to interpreter schedules. A few mentioned their hope to access the broadest possible pool of interpreters easily through a booking agent, ideally with all agencies connected so there is no 'wrong door' for customers. A few government agencies suggested that it would be easier if there was a single point of contact for all interpreter users, as multiple booking systems can lead to confusion and less interpreter availability, and better alignment between the booking agencies was sought.

> *New Zealand is crying out for an efficient booking agency (DHB)*

> *Deaf people (can) wait months due to no interpreter availability or a last-minute cancellation (DHB)*

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I've often gone to (interpreter agency) and then had to find interpreters directly as (interpreter agency) cannot source them (tertiary provider)

Sometimes (the interpreter agency) doesn't bill until six months after a job, which makes budget management challenging (government agency)

Several government agencies encouraged interpreter agencies to post clearly on their website a clear schedule of costs for service users, including interpreter fee, mileage, waiting time, travel and accommodation and booking fees.

However, several agencies also noted the high cost and effort of finding reliable interpreters and that interpreter booking agencies help them to minimise this. Several agencies noted that they value the provision of choice in booking agency to consumers.

It's not a problem to use an (interpreter) agency (DHB)

There is a need to better match interpreters with Deaf clients in specific contexts (DHB).

User education

There are often not a lot of Deaf service users in some individual government agencies (e.g. a small DHB), but when they do use services, people have to be ready to access the interpreter system. Deaf people need to plan their health visits and interpreters early, and health staff need to be better aware of Deaf interpreting needs. Education is needed for both the Deaf community and government agency staff. A few DHB staff commented on their internal challenges of having the importance understood of matching NZSL interpreters to clients' needs.

It's sometime hard to get across to management the need to get the right interpreter (DHB)

4.2.6   Other issues

- MSD has developed a contract for interpreter providers. It is hoped that a range of agencies will use it but at least one government agency said they were not likely to be using it. These contracts need to be aligned to registry requirements.
- One tertiary provider noted that they could possibly use assessments undertaken by the registry to negotiate interpreter income levels with staff interpreters.
- One DHB noted that it is important to remember that the purpose of the registry is to support Deaf people interact with their communities and organisations, rather than simply support interpreters.
- Specialisations (e.g. education, health) are widely considered important for several participants in future developments of the registry.
- Several participants noted that the future of video interpreting needed clarification. In particular, more information is needed on whether the service will be regulated in the future, and if the supply of interpreters can be met by technology. The NZ Video Interpreting Service (NZVIS) was considered useful by those more familiar with interpreting only in some limited situations for Deaf people (e.g. uncomplicated, one or two people, confident sign language users). One DHB, however, thought NZVIS could act

as a consistent backup for interpretation jobs. The Language Assistance Services Project for spoken languages expects to increase use of telephone and video interpreting in the future.

- One agency asked if there could be corporate members of the registry, indicating sectoral support and possibly generating more funding.
- A large number of participants noted they would like to be kept informed of developments and would like a copy of the final report.

4.3   Deaf community

4.3.1   Overall support for registry

There was overall strong support for the development of the registry. It was considered important for interpreters to continually 'invest' in themselves to provide a good-quality service to Deaf clients. Ongoing assessment of skill levels was also supported.

One Deaf person explained that registration means that there are records of interpreters and the work and professional development they have completed. Many Deaf people noted that the registry process is important to give a clearer picture of actual skill levels of interpreters, and keeping a record of their specialist skill area/s. From that information, gaps in skills could be identified to provide the necessary professional development.

Registry recognition and listing of specialist areas for interpreters (i.e. mental health, courts, education or experience in working with children) was also considered important so that people were aware of current expertise.

Some wondered whether this registry would have any legal powers to actually stop unsafe interpreting happening, by being able to stop unethical interpreters/communicators etc. from working? This would be similar to teachers and nurses who cannot work without a current registration. A few people noted that the terms used for interpreters need to be easily understood. For example, to understand the interpreters' level of competence, the terms 'provisional' or 'full' were considered appropriate terms to use.

4.3.2   Registry functions

Most people thought all the proposed functions or jobs, including registration, assessment, professional development, mentoring and complaints, were all equally important.

Several people questioned why the registry would be providing professional development, when there is already professional development provided by some booking agencies. Some did not want to create any difficulties for existing professional development. One person wondered whether it was normal for a registry body to provide professional development and mentoring. Most agreed that greater consistency between trainers would be useful. A few people thought that the registry should just require proof of relevant professional development, and not necessarily provide it.

A few people noted that assessment and mentoring were important for interpreters to feel confident, supported and open to Deaf feedback.

One person noted that if costs need to be reduced, the scope of the registry system could be reduced to focus only on the most important functions, such as registration, assessments and complaints only. A few people mentioned that the need for a review of the registry must be built into the process of development.

One Deaf person also commented that an easy and smooth system is important for Deaf people to make complaints without feeling judged or guilty.

Māori

Several Māori participants mentioned that professional development in te Reo Māori & the marae protocols was very important to raise interpreting quality. They were most interested in how the registry will monitor and support trilingual interpreters. Will the registry have people involved who understand both te Reo Maori & NZSL? They also recommended that in the shorter term, Paheka interpreters could be encouraged to learn te Reo Maori & become trilingual interpreters, or if both NZSL and spoken te Reo Māori interpreters working together could be funded.

4.3.3 Complaints

When asked whether they would prefer a complaints body that was independent but had signing staff who understand Deaf people, Deaf culture, values etc. or SLIANZ, which already could provide that cultural knowledge, there was a mixed response. Several people also noted that they did not know if SLIANZ's current complaints system was working well. Many were unsure as to what would be best.

Around half of those with a strong opinion thought a complaints body should be independent. SLIANZ might be in a position where they're 'stuck' and not able to advocate for an interpreter member, even in a case where the interpreter may be in the right. Some mentioned that SLIANZ should be free to focus on support and advocacy for interpreters. It was noted that their complaint might be better listened to by an independent body, than if it was within SLIANZ. Some felt that interpreters, even on the SLIANZ complaints committee, would support their colleagues more than listen/agree with the Deaf complainant. Some commented that interpreters have more power than Deaf people.

Several people wondered if the complaints body was within SLIANZ, how would the registry work with interpreters who are not members of SLIANZ, but are registered with the registry. Would SLIANZ have the authority to discipline them or even deal with the complaint? The interpreting community is small, so some wondered how neutrality and confidentiality could be maintained if having to discipline one of their peers/colleagues, when they are there to support them.

However, a significant minority felt that SLIANZ would be the logical choice because they do understand the Deaf community and it would be a practical solution. It was noted that SLIANZ would require more resources to run the registry than they have had before.

There was very strong agreement that if the complaints body is independent, Deaf people must be on the complaints panel as well as hearing staff or interpreters. The complaints body must be Deaf friendly, non-judgemental, and work well with both SLIANZ and the registry but they must be there to serve the Deaf community rather than their own individual or organisational agendas. One person suggested that SLIANZ process the complaint, before informing the registry or complaints body, which then makes the final decision.

The range of legitimate complaints was not clear to all. For example, one person wondered if they had a right to complain about 'incorrect' signs, for example that were different to the local dialect. It is clear more education will be needed on use of the complaints process.

4.3.4 Registry structure and location

The question of where the registry should be based also had mixed responses.

> *Difficult to answer this question completely. This will require more in-depth investigation (Deaf person)*

Around half of the Deaf participants wanted the registry to be within SLIANZ, while a similar number argue that it should be independent.

Arguments for the registry within SLIANZ or another agency

Many Deaf people supported the idea of the registry being within SLIANZ, partly because it is an interpreting expert and it is already well known in the Deaf community. SLIANZ also already has a directory of interpreters and provides professional development. Forming another organisation may be confusing and expensive. SLIANZ could be a 'one stop shop' for interpreters to train and develop their skills.

> *The registry should be within SLIANZ (Deaf person)*

One person wondered if the registry would be best placed with another agency that already has a similar function, such as the teachers' council that has more experience in dealing with sensitive matters and has access to legal advice, for example, if required.

Other options for registry location included AUT, ODI, NZSL Board, Ministry of Social Development, or Te Taura Whiri i te Reo Māori (Māori Language Commission). Many Māori Deaf were strongly in favour of locating the registry with the Māori Language Commission, which would increase the status and protection of both official languages In Aotearoa. One person noted that the registry should definitely not be under a government department. A few strongly recommended that it is not under an interpreter booking agency. Another said the board of the registry should be neutral and shouldn't represent any organisations.

Arguments for the registry being independent

A similar number of Deaf people thought that SLIANZ is not independent enough, and a stand-alone registry was important. Several people said that the focus of SLIANZ was on serving the needs of interpreters, rather than the Deaf community.

> *Having SLIANZ is still important though for professional development etc. but I don't think they should be responsible for the registry. I think it will be better within an independent body (Deaf person)*

Solutions

Many people were in two minds about the location of the registry. Several said they would need more information before making a decision. Two people noted that in an ideal world with no financial restraints, then the registry would be independent, like the Teachers

Council, NZ Educational Institute, or Post Primary Teachers Association. However, this would be more expensive because of the small number of interpreters, in which case, perhaps it might be an addition to SLIANZ, as long as the benefits clearly outweigh the risks. An independent group would be more neutral however.

Several people noted that it should be an 'arm' or branch of SLIANZ and not actually SLIANZ itself. Many people who thought SLIANZ should run the registry also talked of the need for internal separation with different people running it. For example, the registry's database would need to be completely separate to SLIANZ's to protect Deaf and interpreter members' privacy. Several people noted that there needs to be independence from but also have a strong and good relationship with SLIANZ.

Some people wondered who the registry would be reporting to. There should be some interpreters, possibly spoken language interpreters, some that know the Deaf world, and some that know the policies for government and public services. The board cannot represent organisations that profit from the registry. There is strong agreement that Deaf understanding will need to be built into the entity.

One Deaf person also noted that a conversation around a registry for NZSL teachers/assessors etc. was needed in the future. Having some flexibility in the relationship between the registry entity, SLIANZ and NZSLTA (NZ Sign Language Teachers Association) or SLPI (Sign Language Proficiency Interview) could be important.

4.3.5   Unregistered interpreters

When asked whether interpreters that are not registered should be able to get interpreting work, people who were largely city-based argued strongly that no work should be given to unregistered interpreters. Several wondered why interpreters would register if they do not have to. Provisionally-registered interpreters should get work of course at an appropriate skill level.

If there was a levy, the risk would be that more interpreters would work freelance to avoid having to pay it. Although several people liked the idea of the levy generally, there is a need to find a way to make sure everyone pays their fair share.

Many people combined the idea of being unregistered and unqualified. An example was given from Australia under the National Disability Insurance Scheme model, where Deaf people manage their own funds. There, some local Deaf people have felt coerced by interpreters, unqualified interpreters, communicators into using them and paying their set rate. So, with the new funding model (System Transformation) coming through, a few Deaf participants said it was important to ensure Deaf people know their rights & the risks of using unregistered interpreters, confirming the need for user education.

A few Deaf participants noted that it was important to make sure agencies, government departments, NZVIS, etc. only use registered interpreters. One noted that at least one interpreter coordination agency promised in the past to stop using communicators but still do, and so trust was broken.

> *If this registry is to function properly, it requires a compulsory registration from all interpreters. If those who are not registered are still allowed to work then the registry will be a waste of time!*

There was some difference in view, especially in the smaller centres, where access to interpreters is more difficult, Many Deaf participants were in two minds. While it was agreed that all qualified interpreters should register, they also want some flexibility for rural/small towns where no registered interpreters are available.

A substantial number of people thought unqualified interpreters who were not registered could do lesser roles, such as communication support, but their status and risks must be made clear to the Deaf people using them. Perhaps they could be limited in the amount of time they could work, and never be used in some roles such as mental health or complex health assignments. People argued that there are times when there is no registered interpreter available, or when a non-registered interpreter is specifically requested by a Deaf person for a specific situation.

> *As long as the Deaf person understands they have chosen to work with an interpreter who isn't registered, if they are happy with that and comfortable with the service they are being provided with, then why not? I think doing it this way is more flexible and therefore allows more choice and control for Deaf people.*

For overseas interpreters coming to NZ for a working holiday, or actually moving to NZ, the minimum amount of work they must be doing, or length of time they will stay in New Zealand before they have to register needs to be clarified. In the past there has been a few interpreters coming to New Zealand for working holidays who are skilled in BSL but there was a question as to whether they should be forced to register. A minimum criterion needs to be set up that is fair for everyone.

4.3.6   Unqualified interpreters and communicators

Asked whether unqualified interpreters or communicators should be part of the registry, again there was a mixed response. Many, especially in larger centres, were of the view that they should not be registered, because it was important to be strict around quality for the long-term development of interpreting services. Auckland participants held the strongest view that registration of communicators should not happen.

> *It would open a 'can of worms' if we allow them to register.*

However, there were a substantial number of people who thought differently, and largely because of the lack of qualified interpreters in some geographical and work (especially education) areas. Some noted that there are some skilled communicators and they should be included in the registry. Another noted that if the NZ Video Interpreter Service (NZVIS) was available '24/7', this would help to solve the availability problem.

Some noted that there are communicators in specialist areas (e.g. Deafblind, minimal language, Deaf interpreting, international sign) and these people also should be acknowledged and supported by the registry, because they are needed by the Deaf

community. The future development of Deaf interpreters needs to be considered within the registry, and the design of assessment, professional developments and mentoring should suit these Deaf interpreters too. One person also wondered about Deaf interpreters with different sign and written languages, e.g. international Sign or English. They might visit some workshops or do the AUT paper on code of ethics, and translation studies, and perhaps could be recognised by SLIANZ in the future.

Some said that communicators should be able to register at some level (e.g. as an associate member), if it is clear that they are working in specialist areas or could demonstrate that they were working towards registration. Several people noted that the registry or SLIANZ could potentially help communicators to become in some way registered, possibly through providing a certain number of mentoring hours and practicum hours to be achieved, completing one or more papers that would enable some protection to be in place for interpreter users. Most thought that the registry still needed to make it clear that those people are not qualified interpreters.

The advantage of a registration level and process for unqualified interpreters or communicators is that it would be possible to track them, limit their scope of work as needed, identify their professional development needs and insist that they at least do some professional development, such as the ethics paper at AUT. This could also help with undercutting of price with registered interpreters, as their status would be clear. One person noted that the UK has a registry that includes a level for communicators.

There were arguments for and against 'grandfathering' existing unqualified but practising interpreters. On one hand it removed a problem and acknowledged the lack of interpreters and human need for work. On the other hand, it limited the ability to argue there are not enough interpreters.

It was widely agreed that communicators should be encouraged and enabled to train and become qualified interpreters within a period of time. The registry may not be responsible for the encouragement or professional development but it still needs to happen.

The issue of interpreter undergraduate training at AUT being accessible outside of Auckland was also mentioned several times. Some participants thought the issue will become more significant in the regions and needs to be resolved, given the cost to move to, and live in, Auckland. Could AUT partner with a university in the South Island? Professional development needs to be more flexible for people outside Auckland. Some suggested an apprenticeship scheme.

I am still looking forward to the day when it is possible for people outside of Auckland to train as interpreters via distance learning or block courses.

Some communicators may not have the academic ability, be able to travel because of personal circumstance, or be young enough to commit to an interpreter professional development programme.

July 2018

4.3.7   Part time interpreters

There was strong and unanimous agreement that part-time interpreters should still have to register, but probably at a lower registration fee.

> *I think hours of work is irrelevant and should not be a reason not to register.*

The registry should be supporting part-time interpreters the same as other interpreters, for example with professional development, which may be online so that travel is not a barrier. A few people mentioned that finding more work might also be needed to help some interpreters become more full time. Online interpreting is another option but supervision is needed for interpreters as provided in the NZVIS call centre.

4.3.8   Registry transition

There was substantial agreement that the registry should take up to five years to set up so that the system works well. In particular, the issues facing unqualified interpreters needs to be resolved, and the registry has time to engage the Deaf community on developments and get used to any changes required of them. It is important that time is taken to ensure the registry is fully functional from the start, rather than making many changes after it is formed.

> *We want this registry to work well from the start, so take the time to set it up and get it working effectively.*

A large minority of people however thought that five years was too long and it should be done earlier, if possible.

4.3.9   Remaining questions and concerns

Some Deaf people were unsure of how the registry would function or affect their access to interpreters. For example, one person wondered if the registry would help towards better matching of interpreters to jobs/Deaf clients. A few Deaf people asked how they would know if an interpreter was registered.

Some people wanted the registry body to provide professional development for the Deaf community in how, for example, to give constructive feedback to interpreters and the role of interpreters. One person noted they would like more information/clarity over whose responsibility it is to book interpreters in various situations. There was considerable agreement that there is an information gap in the Deaf community and that education is needed.

4.4 SLIANZ

During the most recent consultation phase on a possible NZSL Interpreter registry, SLIANZ was asked to respond to six questions around the make-up of a registry board and whether the registry would be administered by an independent body or by SLIANZ. At the SLIANZ AGM on 7th July 2018, members had the opportunity to discuss the implications, advantages and disadvantages of these options and to raise concerns or ask questions around the registry's development and implementation.

While the consultation document and the six questions were helpful in framing the discussion, there are still many unknowns for SLIANZ about the shape that a registration system would take. Members therefore responded to the questions as hypothetical situations where funding would be available to cover the necessary organisational adjustments. At this stage, no clear preference has emerged for either an independent body or an administrative arm of SLIANZ.

SLIANZ would like to submit the following summary of points and concerns raised by our members for the consideration of the ODI. They would welcome ongoing close involvement of SLIANZ as the representative body in discussions around the establishment of a registry, to ensure that interpreters have a voice in matters that will directly impact on their employment and professional practice.

4.4.1 Independent registry body - advantages and disadvantages

Advantages

- The main advantage of an independent body is (perceived and actual) impartiality. An independent body avoids bias and potentially provides a 'safer' complaints process when the panel / board does not consist only of interpreters.

- An independent body would draw on expertise from the wider community, offering an external perspective on interpreters' work.

- An independent body (housed within government or supervised by government) would be better placed to encourage the public sector to comply with standards and would have better capacity to fulfill administrative commitments.

- In this scenario, SLIANZ would not be responsible for registration functions, reducing the responsibilities and potential costs associated with this. SLIANZ would concentrate on other functions, such as professional development and mentoring, and would be able to provide a voice for the interpreting profession and support for individual interpreters in the registration and complaints process.

Disadvantages / risks

- A concern about an independent body is that if the register is put out to tender, some of the organisations tendering may be mainly focused on profit and lack understanding about the role of sign language interpreters and about the Deaf community.

- There is a risk that interpreters and the Deaf community would not be fairly and equitably represented, and that Interpreters as a profession might have less input in the registration system.

- If the role of sign language interpreters is not adequately understood and the focus of the registry is on financial self-sufficiency, there is a risk that interpreters will be seen as 'commodities' rather than as a workforce to develop.

- There may be less trust in an independent body (depending on its composition).

- Professional development needs picked up by the registry through assessment might not filter through to SLIANZ as a potential provider of professional development.

- Interpreters could feel intimidated or not supported in going through the registration process.

- An independent registry might imply a loss of the current resources and expertise in SLIANZ.

4.4.2   Registry run by SLIANZ (as a separate administrative arm)

Advantages

- As the body representing the interpreting profession, SLIANZ have expertise to reflect critically on the profession and make meaningful changes.

- A SLIANZ-run registration system would mean that interpreters could provide input in more direct ways and retain some control over the shape that the registry would take.

- Registration and other functions of SLIANZ could be integrated: for example, gaps highlighted through assessment could be addressed through a professional development programme.

- SLIANZ have existing relationships with the Deaf community. As administrators of the register, SLIANZ could foster trust between the community and interpreters.

- Funding or income associated with the registry would provide a stronger resource base for SLIANZ, leading to a more robust system than the current reliance on volunteers. Funding would not only cover administrative costs but potentially also contribute directly to professional development and mentoring for interpreters.

Disadvantages / risks

- A flip side of close contact with the Deaf community is that a SLIANZ-run system could be perceived as disempowering to the Deaf community and that there would be a lack of trust by consumers in interpreters policing their own profession.

- There could be both real and perceived conflicts of interest between different SLIANZ roles, e.g. in complaints and being an assessor vs. a support body for interpreters

- In a small community, it is hard to avoid bias when hard decisions about a colleague have to be made.

- SLIANZ currently lack the capacity and resources to form a registry body.

- If SLIANZ were recruiting internally for committee / board members to run a register, then there is a risk that a few members would become dominant, and that the industry does not have the diversity of perspectives that a larger organisation might provide (e.g. Māori, LGBT and multicultural perspectives)

- There is a risk that some skilled interpreters might be diverted into administrative roles and taken out of the interpreting workforce.

4.4.3   Changes to SLIANZ structure

The current voluntary organisation structure may not have the capacity and skills to fulfill the functions required in either scenario. Both scenarios involve significant changes to SLIANZ. In both cases, SLIANZ may be responsible for contracting or employing staff. The legal situation around contracting / employment would need to be investigated further.

At the same time, the organisation has existing expertise and resources that could be used in the establishment and implementation of a registry.

If SLIANZ were responsible for registration

- A separate administrative branch of SLIANZ would need to be formed with paid administrative staff.

- A clear separation would need to be made between the functions of the newly established registry and SLIANZ's existing functions

- The SLIANZ Constitution would need to be rewritten to accommodate this restructuring.

- The registry would require some kind of separate board / governance (see section on representation on an NZSL Registry Board below) and a mechanism for forming this board would need to be devised (e.g. elected or appointed?)

- There might be an overarching committee or board overseeing both functions of SLIANZ

● The organisation could model itself on established professional organisations that also maintain a register, e.g. teachers and doctors.

● The administrative branch would outsource / subcontract other registry functions such as assessment (note that this also applies to an independent registry body)

● There is a question about whether current voluntary SLIANZ functions (annual conference, maintaining a directory, liaison etc.) would continue to be run by a voluntary committee or whether these functions would be funded through the registry (e.g. subcontracting PROFESSIONAL DEVELOPMENT to casual paid consultants).

● Membership would need to be reviewed: compulsory registration but voluntary membership of SLIANZ as a professional organisation might lead to discrepancies (e.g. members who meet SLIANZ membership requirements but are not re-registered)

● The complaints process would need to be reviewed:

  ○ Possibly keep SLIANZ complaints process with escalation to the registry.

  ○ If registration is compulsory, then complaints could be made against any interpreter, including interpreters who are not SLIANZ members. Unless SLIANZ membership were also made compulsory, there would be different complaints procedures.

If there were an independent registry body

● The independent body would outsource / subcontract some functions such as assessment and professional development (PD).

● SLIANZ would act as a contract manager providing services (PD, mentoring) to the registry. There are advantages and disadvantages to this position.

● SLIANZ could be funded to oversee a professional development programme that meets member needs and is nationally planned.

● SLIANZ might need employed / subcontracted administrative positions to provide training and mentoring components.

● SLIANZ could continue to provide conferences and run its tuakana-teina programme.

● Constitutional changes (in particular to clauses 3.7 and 3.8) as a result of some functions passing to the registry body (assessment and verification, complaints).

● With fewer responsibilities for registry functions, SLIANZ could focus on advocacy and industry lobbying for interpreters.

4.4.4   NZSL Registry Board: representation, expertise, and concerns

It is essential that a Registration Board would represent the voices of NZSL interpreters, the Deaf community, and hearing users of interpreting services. A Board would also be inclusive of Māori / Pasifika / multicultural perspectives.

Representation of these groups could be achieved by either selecting individuals with particular skills, or through institutional representation on the Board.

Individuals:

- Experienced NZSL interpreters who also have assessment knowledge and skills, and/or are involved as academics or interpreter trainers.
- Deaf interpreters
- Deaf community members
- Deaf academics or interpreter trainers
- Counsellor / supervision experts

Institutional representation:

- SLIANZ
- AUT (interpreter training)
- Interpreter agencies (Connect, iSign, Wordsworth)
- Deaf education centres (Kelston / Van Asch)
- Hearing client organisations who are high volume users of interpreting services
- MSD / ODI

Another suggestion was that suitable representatives could be drawn from a pool of available experts on a case by case basis.

Interpreters of other (spoken) languages might be represented on a Board if registration procedures overlap.

It was also suggested that other professions with established registration systems could be involved during the establishment of an NZSL interpreter registry in an advisory capacity:

- Teacher council rep
- Nursing / Medical profession

4.4.5   Questions and concerns about a Registry Board:

- Selection procedure. Who would decide on Board membership?
- There is a need for consistency and longevity of a Board to ensure that goals are attained.
- Concerns around conflicts of interest of Board members and the potential for bias towards / against certain interpreters (although this could be avoided by clear standards and fair assessment procedures)

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4.4.6 Remaining questions and concerns

1. Establishment of a registry

- What is the anticipated time frame for establishment of a registry?
- Will the registry body / process be reviewed and changed if needed?
- Will a registry be inclusive of possible future additions, i.e. Deaf interpreters? This is considered essential.
- Financial matters:
  - How will a registry be funded?
  - Is ongoing funding guaranteed?
  - There is concern that if a 4% levy were imposed, these costs would mainly be picked up by agencies or interpreters.
- Capacity: are there sufficient people with the skills to assess interpreting?

2. Buy-in and trust in a registry

- Will the Deaf community support the registration system if this prevents them from using a regular / preferred interpreter who does not meet the registration criteria?

3. Interpreters and the practical running of a registry

- Will registration be compulsory? How will this be monitored?
- What are the consequences of not meeting the standards?
- How much would the cost be for interpreters to register, and would this be pro rata to their income?
- A registry should be supportive of interpreters who do not yet meet the standards and should offer the right balance of incentives and sanctions.
- Concern that the process will be time-consuming for interpreters
- Would (re-)registration time frames take into account that some interpreters will have prolonged periods where they are not working (e.g. motherhood, travel overseas)?
- Will the assessment be a pass/fail system, or will there be different levels of registration depending on the results of the assessment?
- Assessment should take into account that many experienced interpreters may not have recent experience of exam conditions and may not perform well in a one-off test. Other assessment options (e.g. practical portfolio) should also be considered.
- How would the registry body monitor interpreters who have been deemed unqualified to work in certain areas?
- Would there be support to assist those who don't meet the standards?
- Will interpreters who don't meet the standards or who have been struck off the register have the chance to apply for re-registration?
- If an interpreter does not agree with the decision of the registry body, will they have the right of reply?
- How will professional development and development paths towards registration be made available for interpreters who live outside of the main centres?

- How will existing structures (e.g. AUT degree, SLIANZ tuakana-teina programme) be integrated?
- Will the outcome of assessment for (re-)registration be made public? Will it be shared with agencies or employers?

4. Complaints

- Would there be mediation between interpreters and consumers in case of a complaint?
- Will there be a more robust complaints procedure?
- Would complaints be handled directly by the registry body?

Appendix 1: Participants

Interpreter coordinators:	Name	Role
Connect	Dan Hanks	Director
Connect	Lynx	Director
Connect	Shizue Sameshima	Bookings Coordinator
iSign and Deaf Aotearoa	Victoria Manning	General Manager - Strategy
iSign and Deaf Aotearoa	Mark Crooke	iSign General Manager
iSign and Deaf Aotearoa	Alan Wendt	iSign Interpreter Manager
NZVIS	Andrea Cooke	VIS Centre Manager
WordsWorth	Shannon McKenzie	Co-director
WordsWorth	Dion McCormick	Co-director
Education		
Kelston Deaf Education Centre	Tom Purvis	Acting Principal
Kelston Deaf Education Centre	Tony Walton	Residential Manager
Kelston Deaf Education Centre	Daniel Greenwood	Acting Resource Manager
Kelston Deaf Education Centre	Anne Shorland	Interpreter Booking Coordinator
Van Asch Deaf Education Centre	Bernie Mulcahy-Bouwman	Principal
Van Asch Deaf Education Centre	Andrew Townshend	Resource Centre Manager
Van Asch Deaf Education Centre	Nicola Robertson	Staff Interpreter
Van Asch Deaf Education Centre	Nadia Flitcroft	Interpreter Booking Coordinator
Van Asch Deaf Education Centre	James Bichan	Staff Interpreter
Tertiary Education Commission	Johnny Tramoundanas-Can	Chief Advisor
Tertiary education providers:		
Ara Institute of Canterbury	Christine Brennan	Disability Support Coordinator
AUT	Jo Hedge	Student Hub Adviser
AUT	Anna Nelson	Disability Student Adviser
AUT	Rosemary Petersen	Resource Manager - Student Hub
Canterbury University	Nicola McDonald	Disability Adviser
Manukau Institute of Technology	Sabrina Sharma	Team Leader Disability Support
Open Polytechnic	Karen Hannay	Open Polytechnic
Unitec	Donna Cavell	Disability Support Manager
Unitec	Kristina Iuli	Team Leader NZSL Interpreter
University of Auckland	Brian Stanney	Manager of Student Disability Issues
University of Otago	Melissa Lethaby	Disability Information and Support Manager
Whitirea	Hamish Cosford	Pathways Adviser
Weltec	Jane Stephens	Disability Support
Health		
DHBs:	**Name**	**Role**
Bay of Plenty	Pritika Nand	Patient Feedback Coordinator, Quality & Patient Safety

Capital and Coast	Joanne Witko	Psychotherapist for 3 DHBs
Hawkes Bay	Rebecca Mackenzie	Patient Support Unit Manager
Hutt Valley	Joanne Witko	Psychotherapist for 3 DHBs
Lakes DHB	Lynda Cantel	PA to Services Manager, Emergency and medical Management
Nelson- Marlborough	Andrew Goodger	Alliance Support Manager
South Canterbury	Anne Greaney	Clinical Resource Manager
Southern	Wesley Bachur	Privacy Officer and Patient Affairs
Taranaki	Mary Bird	Operations Manager, Quality and Patient Safety
Taranaki	Helen Burley	Customer Services Manager
Waikato	Ruth Rhodes	Funding and Strategy
Wairarapa	Joanne Witko	Psychotherapist for 3 DHBs
Waitemata	Samantha Dalwood	Disability Adviser
Waitemata	Grace Ryu	Operations Manager, Asian Health Services
Whanganui	Louise Allsopp	Allied Health Manager
Ministry of Health DSS	Ali Breckon	Contract Relationship Manager
Ministry of Health DSS	Suzanne McGifford	Strategic Advisor
Ministry of Education	Georgina Muir	Manager Health and Disability Policy
Ministry of Health	Sacha O'Dea	Programme Lead, System Transformation
Other government agencies		
Ministry of Justice	Carmen Taylor	Manager of Central Processing Unit
Ministry of Business Innovation and Employment – Video Interpreting Service	Andrew Lockhart	National Manager. Refugee Unit
Ministry of Business Innovation and Employment – Spoken Language Interpreter standards	Andrew Burns	Senior Policy Advisor
Ministry of Social Development - Work and Income	Anne Hawker	Principal Disability Adviser
Workbridge	Keay Bishop	Training, Development and Quality Manager
Workbridge	Lin Dean	Team Leader, Support Fund Services
Workbridge	Lee Natrass	HR Advisor/Support Fund Service Manager
States Services Commission	Geoff Short	Assistant Commissioner
NZ Society of Translators and Interpreters	Quintin Ridgeway	President
SLIANZ	Rebecca Curtis Evelyn Pateman Noreen Smith Tarsha Cutelli Louise Hackshaw Micky Vale	Executive

Plus 40 participants at SLIANZ AGM |

Appendix 2: Registry information sheet

NZSL Interpreter Registry

Why do we need one?

Deaf people have a life-long need for NZSL interpreters, who provide a critical service for social, vocational, and economic inclusion in mainstream New Zealand society.

There are many strengths within existing interpreter services (e.g. undergraduate degree course, mature workforce with diverse skills, a professional interpreter association in SLIANZ), but there are also some fundamental challenges in providing a good interpreter service for Deaf people.

- New Zealand Sign Language (NZSL) interpreting is a complex human service that is not well understood outside the profession and the Deaf community.
- Interpreters have no mandatory monitoring requirements after graduation.
- The Deaf community consider NZSL interpreter services to be overall of moderate quality and highly variable.
- Interpreters widely support the idea of a compulsory registry to enhance consistency and quality in service delivery.

What will a registry do?

All interpreters would be required to register, which in turn would require the following services:

Assessment

Develop and implement an assessment at a level expected two years after graduation, including the provision of feedback on two pieces of live interpreting work. Once passed, the interpreter would not need to re-sit the assessment unless there was significant concern about their interpretingability.

Re-registration would occur every three years after initial registration. Senior interpreters with more than five years' of work experience would be required to provide proof of membership of SLIANZ, professionally-focused training undertaken, and demonstrating skills through a portfolio of work.

Professional development: Training and mentoring

Proof of ongoing professional development will be required. Funds for professional development interpreters would be targeted at the greatest interpreter workforce needs, which would then be contracted out to skilled providers. These needs would be identified by the sector and collected and filtered by the registry.

Mentoring in the first five years after graduation and mentoring/supervision every two months for at least two years.

Complaints

Preliminary complaints should be raised initially with the interpreter or the interpreter agency if possible. SLIANZ or the registry may give further advice and the advocacy service and the Health and Disability Commissioner should also be available to receive complaints, with advisory input from interpreters.

These systems will be developed over a five-year time frame.

How will it be funded?

Most similar bodies (e.g. NZ Speech and Language Therapist's Association, Education Council of NZ) are funded through membership, professional development, and assessment fees. The small size of the NZSL interpreting profession (~100) means that this registry is relatively expensive in comparison to other standards bodies and is less financially viable from these sources.

In addition to registration fees, and professional development and assessment fees, a 4% levy on all interpreting assignments through the interpreter coordination agencies and possibly other major interpreter providers has been suggested as one way of funding the registry.

The levy would specifically pay for the professional development and mentoring costs as well as the registrar to oversee the systems and would bolster assessment and registry fees.

All government bodies may be instructed by the government to use these interpreter coordination organisations in order to collect these fees and also maximise the ability of the workforce to meet service user needs.

Detailed estimates of costs indicate that the registry may become self-sufficient within three years.

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│            │ │SI)    │ │          │ │drive   │ │new grads  │ │first 5│ │complaints│ │registry &│
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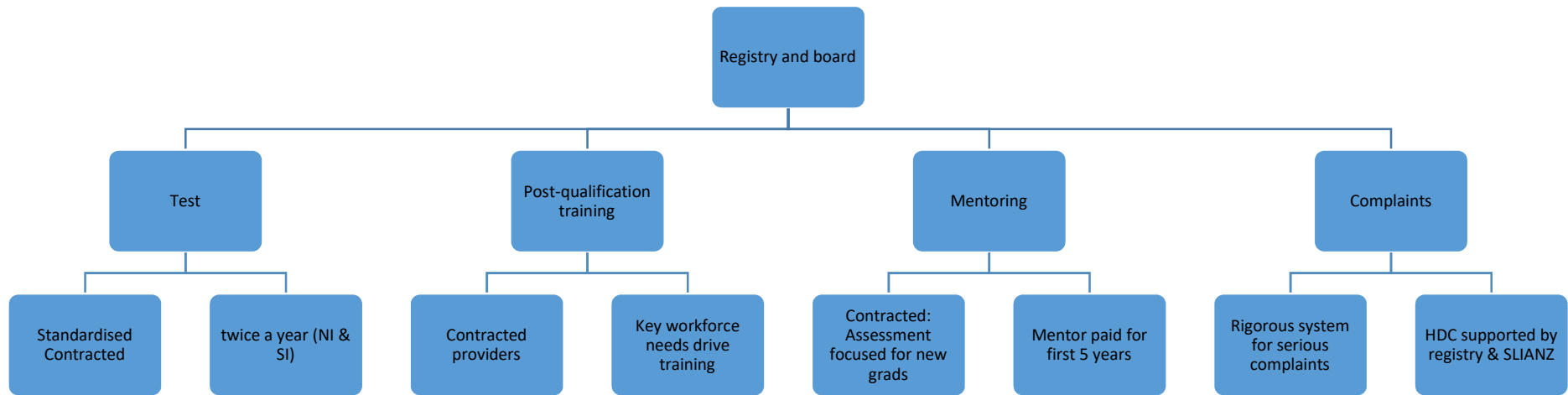
Appendix 3: Questions of government agency NZSL interpreter-users

4) Do you think the development of a NZSL Interpreter registry is needed?

5) Do you agree assessment, training and mentoring support and a complaints system are essential elements of a professional registry at this stage?

6) What questions do you have around the registry's development?

7) Do you support the idea of a cross government-fund or levy on interpreting fees to help fund the registry? Is there a strong preference for either from your view?

8) Do/would you be prepared to use only registered NZSL interpreters to enhance interpreting quality?

9) What would be the impact on your organisation of doing so?

10) Are you in a position to ensure appointments with interpreters through interpreter coordination agencies (e.g. iSign, Connect) in order to pay for a levy?

11) If you aren't already doing so, are you open to providing choice to Deaf users and therefore working with multiple interpreter agencies to enable that choice?

12) What would that require from you?

13) Do you have any other questions about the functions of the registry?

Appendix 4: Deaf consultation – information and questions

A wide range of government users of NZSL interpreters and the Deaf community are being invited to give feedback on the next steps towards developing a national NZSL Interpreter Registration system.

The aim of this consultation is to, firstly, inform key stakeholders of the registry's development, its design features, and purpose in improving quality services. Secondly, feedback is sought to identify the level of support for the idea of a registry, the use of only registered NZSL interpreters, and funding for the registry.

Fitzgerald and Associates is carrying out this consultation process on behalf of the Office for Disability Issues and the NZSL Board.

NZSL Interpreter Registry

Why do we need one?

Because of the limited access for Deaf people to health care, education, work and all parts of NZ life, there have been two reports now done on the future of the interpreter service in New Zealand. The first report said that there is a big need for a NZSL interpreter standards system to be set up in New Zealand to a) enable the Deaf community to receive professional interpreter services of a high quality standard suitable to their requirements, and b) ensure that NZSL interpreters and services that employ interpreters are supported to provide a high-quality interpreter service throughout New Zealand. This report looked at systems for Sign Language around the world and for other professional groups in New Zealand.

The second report showed the requirements for the various activities of the registry, and some ways to structure it, including costs of the service. It showed that the service needs funding from interpreters but, because there are less than 100 interpreters and many are part time, it will also need extra funding. It recommended either this extra funding come from government or a small levy on interpreter fees.

Deaf people have told us from this research that there are some good things about interpreter services (like good training, some interpreters have good skills, SLIANZ), but there are also some big challenges in providing a good interpreter service for Deaf people.

- The Deaf community consider NZSL interpreter services to be overall of moderate quality and highly variable.
- New Zealand Sign Language (NZSL) interpreting is a complex service that is not well understood outside the profession and the Deaf community.
- Interpreters have no monitoring requirements after graduation.
- Both Deaf people and interpreters widely support the idea of a compulsory registry to improve consistency and quality in service delivery.

- There are costs to establishing this body but interpreters are unable to meet these costs (unlike many other professions) because of their low numbers and the low income of many interpreters.

What will a registry do?

All interpreters would be required to register, which will include the following requirements:

Assessment

Assess at a level expected of an interpreter who has been working for the equivalent of two full-time years after graduation, including the provision of feedback on two pieces of live interpreting work. Once passed, the interpreter would not need to re-sit the assessment unless there was significant concern about their interpreting ability.

Re-registration would occur every three years after initial registration, requiring proof of professional learning and development (training, mentoring and a portfolio of work).

Professional development: Training and mentoring

Proof of ongoing professional development will be required. Funds for training interpreters would be targeted at the greatest interpreter workforce needs, which would then be contracted out to skilled providers. These needs would be identified by the sector and collected and filtered by the registry.

Paid mentoring by senior interpreters will be given in the first five years after graduation.

Complaints

Complaints should be raised first with the interpreter or the interpreter agency if possible. The complaints service must be accessible with people who sign and understand the Deaf community.

All these systems will be developed over a five-year time frame. When the system is fully in place, the registry will focus on supporting interpreters to keep improving. In some extreme cases, the registry will be able to 'de-register' interpreters who, for example, have behaved unethically or consistently not met registry requirements and have not improved when the problem is addressed.

For the registry to work, the registration system needs to include all people doing interpreting work or the registry won't be able to ask all registered interpreters to meet requirements. Interpreters who don't want to meet the requirements just won't register. De-registration won't mean anything if not all have to register – they would still be able to get interpreting work.

Costs

Although costs are not yet finalised, to give you an idea of costs, an early study showed that if interpreters paid $1,100 over three years for their assessment and registration ($367 a year) and re-registration for interpreters who have passed the assessment costs $230 a year, there is still a shortfall of around $150,000 a year for the registry.

This consultation

Now we are talking to government agencies, who are big users of interpreters, about their thoughts on the need for the registry and whether they support the use of a government grant or a levy on the fees they pay.

From our discussions with government agencies, we have heard that:

- There is widespread support for enhancing the quality of NZSL interpreting through a registry.

- There is agreement that assessment at a 2-year full time level after having passed the AUT qualification, and ongoing professional development (training and mentoring) as well as enhancing complaints system access are important ways to do this.

- The registry was recommended to be an independent body that makes sure that interpreters meet their assessment, training and mentoring responsibilities and address complaints. The registry would represent clients more than interpreters, and this would leave SLIANZ free to focus on support and advocacy for interpreters.

  However, many people in interpreting and government agencies think the Deaf sector is too small and it would be simpler and cheaper to have SLIANZ also be the registry. This would mean that SLIANZ would change quite a lot from the voluntary body it is to manage staff and commercial contracts. They would need to have a registry (monitoring or policing) arm as well as providing advocacy and support for interpreters.

- Registry costs have to be funded either through an ongoing government grant or a levy on all interpreting fees. Government agencies prefer the idea to raise government money in general. These agencies see NZSL interpreting as important for Deaf people but very expensive and do not want to pay any more than they do now from their budgets. It might be hard to get extra government money because

there are so many needs and if it does prove difficult, there might need to be a levy (e.g. 4% of every interpreting job is collected once a year from agencies) to pay for the registry.

Examples for the future

Example 1: A young woman graduated from AUT as an interpreter a year ago. She is getting more work and is learning a lot. You had trouble understanding her at a work meeting last week and told her she wasn't clear. She thanks you for your comments and says she will think about how to improve.

She is provisionally registered with the NZSL interpreter registry. She is not ready to sit her assessment yet but she is given formal mentoring every two months. She has talked to her mentor about what you told her. The mentor comes to watch her interpret sometimes and gives her feedback about how to improve for her assessment. She has also been encouraged to go to some training and team with an interpreter that will help her in some areas. The next time she sees you she tells you what she has done and you notice an improvement in her signing skills.

Example 2: An interpreter makes an important mistake for you at an appointment with your doctor and luckily you asked the doctor to clarify and caught the mistake. You are worried that the interpreter is not trying hard enough and you tell her this. You are not happy with her response and you tell the interpreter booking agency. They talk to her but you are still not happy with their response. So you make a formal complaint to the registry and the registry makes sure you and the interpreter are heard fairly by the complaints body and the issue is resolved. The interpreter agrees to do some training and make some changes in the way she works.

Deaf consultation questions

1) Do you support the development of an NZSL interpreter registry to improve interpreter quality?

☐ Yes

☐ No

☐ Maybe

Comments: _____

2) Which part of the registry do you think will most improve the quality of interpreting services? Mark them in order of importance (Number them with 1 being the most important, 5 being least important)

☐ Registration process (collecting information and overseeing process)

☐ Assessment

☐ Training

☐ Mentoring

☐ Accessible complaints system

☐ All of the above – they are all equally important

Comments: _____

3) Which would you most trust to handle your complaint about an interpreter the best way?

☐ Independent complaints body (with signing staff who understand Deaf people, Deaf culture, values etc.)

☐ Complaints body based within SLIANZ

4) Where should the registry be based?

☐ The registry should be independent of any other body (stand-alone)

☐ The registry should be part of SLIANZ

Comments: _____

5) Interpreters who are not registered with the registry

☐ Should not get interpreting work.

☐ Should get interpreting work in some circumstances (e.g. at times you can't get a registered interpreter).

Comments: _____

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6) Communicators or unqualified interpreters should **not** be able to register with the registry
   - ☐ Agree
   - ☐ Disagree

   Comments: _____

7) Communicators or unqualified interpreters should be encouraged or helped to qualify and become registered in the first five years of the registry.
   - ☐ Agree
   - ☐ Disagree

   Comments: _____

8) Part time interpreters (working less than 10 hours a week) should still have to register with the NZSL interpreters' registry
   - ☐ Agree
   - ☐ Disagree

Comments: _____

9) How do you think part time interpreters can be best supported by the registry?

Comments: _____

10) The registry should be developed over 5 years to give interpreters and the Deaf community time to adjust to what is needed.
   - ☐ Agree
   - ☐ Disagree

Comments: _____

11) Do you have any other concerns or questions about the registry?

Comments: _____

Thank you for taking the time to fill in this survey and have your say in the development of the NZSL interpreter registry!