

2017 Price Review National Disability Insurance Agency GPO Box 700 Canberra ACT 2600

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The Australian Sign Language Interpreters' Association (ASLIA) is a not-for-profit body and is the national peak organisation representing the interests of Auslan/English Interpreters and Deaf Interpreters in Australia. The Association is comprised of a national Executive Committee, with representatives from ASLIA associations in most Australian States and Territories.

While ASLIA is not a service provider, our membership consists of individual members who are interpreter trainees and practitioners working as full time, freelance and casually employed interpreters together with corporate members who are primarily interpreter agency service providers.

ASLIA has a 25-year history of representing the Auslan/English Interpreter industry. Our unpaid, voluntary committee work on issues relating to the needs of the industry, ensuring that best practice protocols are upheld and working conditions of interpreters are represented. ASLIA takes a proactive and collaborative approach to resolving issues faced by practitioners and the industry. ASLIA's approach is two-fold:

- i) Awareness and education among interpreters, and
- ii) Ensuring best practice and working conditions for interpreters.

These activities take place in collaboration with employers, practitioners and clientele (both deaf and non-deaf) which contributes to the importance of, as much as is possible, a sustainable interpreting industry.

For the purpose of ASLIA's response to this review, we concur with the view that interpreters play a vital role in providing 'assistance to access community, social and recreational activities (attendant care)' as described on page 2 of the Discussion Paper. We do not support the application of the terms "attendant care" nor "support worker" when referring to interpreters, as has been adopted by the NDIS.

Throughout this submission, ASLIA refers to the Deaf community, members and participants as a collective. Thus, the term "Deaf community" relates to the community of people who require interpreting services to communicate effectively in the mainstream community and encompasses Auslan or other Signed Language users, which includes those who identify as Deaf, Hard of Hearing and Deafblind.

#### 3.1. PRICE LIMITS FOR ATTENDANT CARE AND RELATED INDIVIDUAL SUPPORTS Q1 How do you decide what price to charge participants?

The Auslan/English interpreting industry consists of a minority of permanent full-time employees together with a majority of part-time or casual employees, as well as freelance interpreters.

There is currently no award specific to the interpreting profession. The Social and Community Services (SACS) or the newer Social Community Housing and Disability Services (SCHADS) awards, may have been used as a guide for negotiating full time or part time rates for Auslan/English interpreter employees.

It should be acknowledged that historically, community welfare workers mainly provided a paternalistic/caretaker role, which encompassed communication assistance to Deaf, Hard of Hearing and Deafblind people throughout the nation – whilst at times performing loosely the role we now know as that of an interpreter. In the early 1980's Auslan/English interpreting became a distinct and separate discipline. Since this time, there has yet to be specific remuneration guidelines established nor a career structure to underpin the work of Auslan/English and Deaf Interpreters. However, Auslan specific interpreting agencies have established remuneration and WH&S practices that vary slightly across Australia.

In recent years, minimal changes have been made to remunerate interpreters commensurate with the skills required, training undertaken and specialist attributes/knowledge.

Interpreter Agencies with permanent staff may negotiate hourly rates and working conditions and factor in overhead costs to inform the price billed to clients. The Australian Government has been aware of the resultant charges to clients as noted in a 2004 research report commissioned by the Department of Family and Community Services, here on in referred to as the 'Orima Report':

'To cover the administrative costs associated with operating the booking service, the Auslan interpreting service provider will charge a higher rate to the client than it pays to the interpreter. The rate paid by the hearing client can be twice the amount paid the Auslan interpreter, although rates and margins vary significantly across providers' (Orima Research, 2004, p.40)

#### and

'While generally Auslan interpreters must be booked for a two-hour minimum period, some interpreters indicated that travel expenses and time taken to prepare for complex matters are often unpaid' (Orima Research, 2004, p.46)

The above factors influence cost calculations that are utilised by both agencies and selfemployed freelance interpreters to establish a benchmark for working conditions and remuneration.

Freelance interpreters, generally speaking, are offered work via a number of Auslan specific and non-language specific interpreting agencies. Contract interpreters may not have the same benefits as employees who work casually or are employed full time or part time. Interpreters who operate their own business as practitioners will not receive benefits offered by interpreting agencies such as superannuation provisions and other entitlements, employer sponsored training and development, supervision and debriefing, nor WH&S protections. The quality assurance offerings and Workplace Health and Safety guidelines applied by some Auslan specific interpreting agencies are not generally available to those who are sole traders.

Interpreting assignments that exceed 1 hour or are intensive in content within a 1 hour duration requires 2 practitioners to work in tandem – this is in line with industry norms that address WH&S and to ensure quality is maintained throughout the assignment as well as ensuring quality service provision (ASLIA, 2014). It has been the standard practice over many years, with several Auslan specific interpreting agencies that each assignment is a minimum of 2 hours (this may differ across the country and between interpreter agencies).

Recently, there have been discussions suggesting that the minimum booking duration be reduced to ensure productivity and efficiency. This trend may be counterproductive to the industry as interpreters may not accept assignments if remuneration for their service is severely reduced.

To illustrate the remuneration issue, a Ministerial Briefing commissioned by the Victorian Minister of Multicultural Affairs reported that:

"....59.5% of the interpreting workforce earns less than \$20,000 and only 7.2% earn above \$60,000" (Professionals Australia, 2015, p.6).

and

"...findings are supported by data from the 2011 Census that shows the average annual salary for an interpreter is \$25, 544 and \$31,931 for a translator. To earn this salary the practitioner works on average 24 hours a week despite the vast majority of the workforce wish to work more' (Professionals Australia, 2015, p.6).

It is with interest that close attention has not been paid to the 2014 determination made by the Australian Competition and Consumer Commission (ACCC):

In June 2014, the ACCC made a determination (A91402 that translators and interpreters, who are contractors, should be able to discuss, set and negotiate a set of fair recommended rates. It found that the public benefit in practitioners negotiating a new set of rates outweighed whatever public detriment may occur (Professionals Australia, 2015, p.7).

Further detrimental changes in the pricing structure may result in an exodus of interpreters from the industry resulting in further reduction in the uptake of interpreting as a profession, which is vital to ensuring communication access for the Deaf community. The above-mentioned issues may be exacerbated with the uncertainty of the transition of interpreting service provision outlined by the NDIS.

# Q2 Do you have any comments on the current price limits, e.g., are current price limits sufficient to recover the costs of providing attendant care and earn sufficient profit, and do they affect the ability of your organisation to compete in the NDIS market?

At the outset, ASLIA seeks clarifications on the NDIA's intention regarding the pricing for personnel engaged to perform interpreting duties.

In the 2015 NDIS Price Guide (NDIA, 2015, p.19), the following price limits were as follows:

Name	Item	Price	Support Cluster
Telephone or video	21 006	\$83.97 hour	Interpret/Translate
interpreting			
Auslan or signed	21 001	\$115.46 hour	Interpret/Translate
English training			
Interpreting and	21 003	\$117.55 hour	Interpret/translate
translating			

However, in the 2016 NDIS Price Guide (Vic/NSW/Qld/Tas) (NDIA, 2016, p.26), unless the Price Guide has been truncated for the purpose of this review, the nearest price limit category seems to be:

Support Item	Item Ref No	UOM	Price
Assistance to access community, social and rec activities – individual per weekdays	04 104 125 6 1	Hour	\$42.79
Assistance to access community, social and rec activities – individual per weekday evening	04 103 125 6 1	Hour	\$46.93
Assistance to access community, social and rec activities – individual Saturday	04 105 125 6 1	Hour	\$59.36
Assistance to access community, social and rec activities – individual Sunday	04 106 125 6 1	Hour	\$75.96
Assistance to access community, social and rec activities – individual per public holiday	04 102 125 6 1	Hour	\$92.53

The 2016 price guide bears many hallmarks of the categories within the SCHADS award, and it is inappropriate for interpreters to be categorised in this group.

If the latter is intended to replace the former, this is alarming and needs immediate consultation with the interpreting sector. The 2016 Price Guide does not support a sustainable interpreting workforce, where the majority of practitioners are casually employed.

The 2016 Price Guide does not take into account that practitioners may also bring additional qualifications, knowledge and skills and therefore require higher remuneration. Currently, Auslan/English interpreting is an unregulated domain for those who are self-employed and restricted if practitioners are agency employed.

Demand has, for the last two decades, exceeded supply. The Orima Report recorded in their research that '...66% of the occasions on which users said that interpreting services had been supplied related to education/employment.' Medical related services took up much of the remaining 34% (Orima Research, 2004, p.59). This leaves little room for capacity in other areas of life where interpreting has not previously been funded, as identified by the Orima Report. These areas of service provision have been missing to date and ASLIA believes Deaf participants will embrace these thanks to packages offered by the NDIS:

- 'Family and social occasions, such as weddings or funerals;
- Child related activities, such as school visits, school fetes, swimming lessons, parents' groups and guardianship meetings;
- Purchasing goods and services or obtaining quotes;
- Sporting related matters;
- Community meetings, public speeches or live theatre performances;
- Emergencies, such as motor vehicle accidents;
- Religious activities such as church services' (Orima Research, 2004, p.62)

Participation in community as the mantra of the NDIS is supported by the European Parliament, who in 2016, also recognised the need for interpreting to be provided for children - *'…early intervention programmes are crucial for children in the development of life skills, including language skills; notes furthermore, that those programmes should ideally include deaf role models…*' (European Parliament, 2016, Clause 20).

While it is true that government funded services of the National Auslan Booking Service (NABS), the Employment Assistance Fund (EAF) and National Relay Service (NRS), among others, have been the catalyst for growth of the Auslan/English interpreting profession, the lack of permanent roles and career structure/remuneration offerings still remains a major deterrent to attracting and retaining interpreters in the industry.

With the NDIS rolling out across Australia, including regional and rural areas, the demand for interpreting will increase exponentially. The proposed NDIS Price Guide, unless clarified and expanded to incorporate an attractive employment option, will severely limit the availability of interpreters.

To illustrate the need for the NDIA to reconsider price limits for the interpreting profession, we provide general price brackets of what is currently charged by individual interpreters:

NAATI Para-professional (formerly Level 2) Interpreter: \$45 - \$70 per hour

NAATI Deaf interpreter recognition: \$45 - \$70 per hour

NAATI Professional (formerly Level 3) Interpreter: \$50 – \$80 per hour

NAATI Conference Level Interpreter: \$55 - \$100 per hour

The above price approximations are for weekday rates, after hours and weekend assignments incur additional loadings. This means that interpreters may charge more/or less than the above stated hourly rates, regardless of their NAATI accreditation status.

In addition, the WH&S practices currently in place may be eroded. In order for interpreters to be employed through agencies, there are WH&S requirements ensuring two interpreters on most assignments of more than one hour. It is difficult to envisage how this vital component will be managed if interpreters are not booked through interpreter service agencies. This option also comes with the additional overhead costs that ultimately safeguard interpreters against workplace injuries.

## Q3 Do you charge a different price for agency-managed participants, self-managed participants or non-NDIS participants?

As a representative body, we do not provide interpreting services.

It is common knowledge that there is price differentiation offered to interpreter practitioners with agency-managed delivery, self-managed participants and non-NDIS employers.

## Q4 Do you have any comments on the approach of setting price limits based on the efficient cost of provision?

ASLIA's position in terms of setting price limits based on cost efficiency is that service, quality and WH&S issues may be compromised. Provision for Deaf interpreters is currently not factored into the proposed NDIS schedule. Deaf interpreters are utilised for situations requiring specialist language knowledge in conjunction with Auslan/English interpreting services.

In person interpreting requires travel from point A to point B and practitioners may travel up to 5 assignments within one day. This means that travel time is a major factor for practitioners. Notwithstanding the minimum booking duration, travel time charged to clients is commonplace for many professions. Travel costs are paid to practitioners by interpreter agencies, or when negotiated between practitioner and service user. This generally occurs when an assignment exceeds 40kms or 50kms one way (this may vary amongst current interpreting agencies) and should be considered by NDIA.

The skill of practitioners required for each assignment will vary as in any professional industry. This needs to be considered when bookings are made, as each interpreter will not have the

requisite skills to do all types of assignments. This means that the interpreter's skill and qualifications need to be considered when assigning practitioners to particular appointments, not basing appointments on the closest available interpreter. This cannot occur if practitioners are not operating via an interpreting agency where these quality measures can be managed.

ASLIA believes that minimum hourly rates and allocation of two interpreters for assignments longer than an hour (for complex and/or continual discourse) should be outlined in the NDIS Price Guide to prevent practitioners from acquiring a workplace injury i.e. Repetitive Strain Injury or Overuse Syndrome.

- Q5 What changes are you likely to make in your provision of attendant care (e.g., quality and amount of care provided) under the NDIS if the price limit for attendant care was:
  - not changed in the next price guide;
  - increased in the next price guide; or
  - decreased in the next price guide?

The NDIA needs to clarify if the 2016 Price Guide will categorise a separate price structure that relates specifically to Auslan/English and Deaf interpreters. ASLIA recommends that further detailed analysis and consultation take place with the Auslan/English and Deaf interpreting workforce.

ASLIA notes that in the NDIS Provider Toolkit – Module 4, that interpreters and translators are regarded as a professional group. Section 4.2 Professional Registrations Groups states '...these registration groups require specific professional qualifications and experience as a prerequisite to provide these supports under the NDIS' (NDIA, 2016, p.19)

NDIA clearly recognises interpreters as a professional group but it is currently unclear regarding the provision of commensurate remuneration in the 2016 Price Guide.

ASLIA seeks collaboration with the NDIA to resolve the issues outlined in this submission. In particular, a qualification vetting process where interpreting services are provided to NDIS clients, as at present there are no such processes. There is also concern regarding registered providers who are sole traders and those who are unregistered and booked by self managed NDIS participants, especially if there is no formal process to ensure adherence to professional standards and quality service provision.

# Q6 Do you have any specific concerns regarding access to sufficient labour to offer attendant care under the NDIS? If so, do you feel this is impacting costs (such as wages) and if so how is your organisation responding?

The proposed NDIS Price Guide will exacerbate the lack of career pathways including appropriate remuneration, working conditions and security in the interpreting industry, training which has led to an undersupply of interpreters. Due to the lack of interpreter practitioners, clients may need to book an assignment at least two weeks in advance. Sometimes even these measures may not be successful, due to the lack of adequately skilled practitioners throughout the country to meet the demand.

ASLIA ascertains that as the NDIS is progressively rolled out, Deaf people will require interpreter support for activities that previously were unfunded. This ultimately will provide NDIS participants with the ability to access the wider community and be provided with more choice and control. Consequently, this also means there will be an increase in demand for interpreting services. Demand will further outstrip supply and if remuneration is inadequate, skilled, quality practitioners will not opt to work with NDIS participants.

The current numbers of trainees studying Auslan/English interpreting is insufficient to meet the demand from current and continually emerging markets. Trainees may take between 5-10 years to become proficient as NAATI professional level practitioners, if at all. The first NAATI accreditation level is para-professional. Para-professionals are not equipped to manage interpreting assignments of a specialised nature (refer Appendix A). It is NAATI Professional level and Conference level practitioners who ideally that have the skill to manage professional domains and complex interactions.

Interpreter agencies now employ only NAATI accredited interpreters. This systemic practice has removed the ability for those claiming to be interpreters from providing substandard service. It is detrimental for the interpreting industry at the discovery of reports that unqualified interpreters are hired to undertake "interpreting" services by participants of the NDIS. ASLIA has received reports that family members undertaking the entry Certificate II qualification in Auslan are then accepted as a registered interpreter provider through NDIS (language qualifications are different to interpreter qualifications). This appears to be because NDIS does not stipulate that interpreters be appropriately qualified and accredited by NAATI (who also maintains a diligent revalidation process to ensure practitioners comply with ongoing professional development practices and ethical conduct).

While participants are afforded the NDIS mantra of 'choice and control' by selecting personnel of their choice, unqualified and/or unaccredited interpreters are undertaking work they have no accreditation for. The concept of 'choice' needs strict guidelines pertaining to employees that are undertaking the interpreting service. It is concerning that interpreters may not be categorised as professionals within the NIDS framework. It would be negligent of the system to appoint an unqualified Occupational Therapist so it is perplexing to see interpreters clustered with workers who require little, if any, academic training. This current lack of minimum standards of interpreters working with NDIS participants may result in unsatisfactory or even negligent outcomes. ASLIA believes that the 'choice and control' mantra needs to be supported by a background of checks and balances. Choice and control needs to ride on the backbone of quality and accredited service providers. A regulatory framework amongst individual interpreter service providers and interpreter agencies is also recommended as an important element of the NDIS.

It is suggested that a process involving regulation and oversight of interpreter practitioners working with deaf clients needs to be established by the NDIA.

As interpreters share one language, (Auslan) with a Deaf/Deafblind client, interpreters may be relied upon to provide services that belong in other specialist domains i.e. social/community/support workers.

ASLIA does not encourage the practice of combining the duties of an interpreter and that of support worker. The past 30 years has seen the Deaf community become increasingly independent, via the use of interpreters in many aspects of life after the separation of the role of welfare worker and interpreter. ASLIA does not support a return to the days where dependency upon interpreters is the norm. Deaf/Deafblind clients may require separate funding allocation to engage support workers that meet this additional and different service.

The above dilemma bolsters the need for distinction between interpreter and support worker, and that interpreter practitioners need to be removed from the 'attendant' category and placed in the professional category.

For choice and control to be a realised NDIS concept, NDIA needs to stipulate that all interpreters are NAATI accredited. The Federal Government established the National Accreditation Authority for Translators and Interpreters (NAATI); the NDIA could rely upon for establishing processes within the NDIS for the use of interpreter practitioners. Currently, NAATI is undertaking the transition to a proposed new certification scheme that incorporates specialisation domain certification of practitioners as one avenue to ensure quality of service provision.

'The delivery of language services unlocks social and economic potential in Victoria's diverse communities. It also helps to mitigate the risk inherently associated with delivering services to community members whose first language is not English. The workforce crisis in language services has meant that lower standards of professional conduct, qualification and accreditation are now being accepted by agencies. This acceptance is both covert and overt. As such, the risk profile of delivering these services is rising and government is opening itself to greater levels of liability as a result of inappropriate or failed language services delivery. The damages, both financial and personal, can be significant' (Professionals Australia, 2004, p.2)

ASLIA suggests that the NDIA stipulating interpreters be accredited will restore some certainty and security and stability to the interpreting industry. This is a foundational step to ensure professional standards are upheld when meeting the communication needs of NDIS participants.

### Q7 Have you had any difficulty in securing a provider that will give you the amount of attendant care services in your plan? If so, please explain the circumstances.

ASLIA is not a service provider and therefore cannot respond to this question specifically from an interpreting provision perspective.

ASLIA believes inadequate supply of interpreter practitioners will become a major issue and urges the NDIA to confer with governments in adding Auslan and interpreting qualifications to each state's 'skills shortage' list so as to nurture the future supply of interpreters (e.g. NSW's Smart and Skilled, and the NSW Premier's Priorities). Funding and specialist high quality training for interpreters needs to be expanded at University level throughout the country.

The European Parliament '...stresses the need for qualified and professional sign language interpreters, which can only be met on the basis of the following approach: ...

(b) Formal training (university or similar, equivalent to 3 years of full-time studies, corresponding to the training required of spoken language interpreter,

(c) Registration (official accreditation and quality control system, such as continuing professional development) ...' (European Parliament, 2016, Clause 1).

### Q8 Are the assumptions outlined in this section appropriate for estimating the efficient cost of providing attendant care? If possible, please provide examples of your experience.

We refer to our responses outlined in questions 2, 4, and 5.

### Q9 Do you have any comments on the suggested modelling approach, such as, on the appropriateness of the cost categories?

We refer to our responses outlined in questions 2, 4, and 5.

#### 3.2 SIMPLIFICATION OF 'SHARED CARE' PRICE CONTROLS

### Q10 Should the structure of price controls be changed, and if so, why? Do you have any suggested changes?

Generally, most interpreting is performed 1:1 or 1:2. Where interpreting is provided to a group of clients at the same time, it can be in one language direction or amongst individuals via dialogue. An example of a one way interpreted group event is an interpreter working for a public presentation by the Dalai Lama or the Pope at a mass gathering.

Dialogue interpreting may be a group workshop where Deaf participants interact with a non-deaf facilitator or presenter and/or with community member participants. An example for public council meetings where concerned deaf ratepayers wish to dialogue with council representatives.

The management of interpreter provision and funding when a group of deaf clients receive services at the same event may currently be difficult to manage with individualised funding allocations to NDIS participants.

### Q11 Do you have any comments on how a change to the structure of price controls would change the services you provide or your business processes.

We refer to our responses outlined in questions 2, 4, and 5.

#### 3.3 OTHER UPDATES TO PRICE CONTROLS, RULES AND GUIDANCE

# Q12 Do you have any comments regarding the proposed changes to rules and controls, e.g. changes that require further investigation, additional minor adjustments that should be made?

Auslan/English and Deaf interpreters need to be appropriately categorised.

Guidelines regarding funding processes for interpreters when a group of Deaf participants attend a community event need to be developed.

There may be instances where a number of clients want to access a singular event, which is interpreted, and the interpreter charges each client attending the event the full rate per person as opposed to sharing the cost of interpreters amongst the Deaf participants.

Individual interpreter registered providers may also undermine current agency practices that ensure the right skill set is in place and WH&S protocols.

In addition, another consequence of individual providers will occur when an interpreter is ill. Currently, interpreter agencies have the ability to manage the workforce by sourcing a replacement; this will not be possible if individual registered providers are the preferred option for the NDIS and participants.

For NDIS participants opting to self-manage their plans, there are no safeguards for participants who engage an interpreter that is not currently registered with the NDIA. Direct bookings of interpreters by NDIS participants means there is no vetting process at all, this needs to be addressed as an immediate concern to ensure fraudulent practices do not have an opportunity to occur. The NIDA needs to introduce a requirement that all interpreters directly booked by the self-managing participant must supply their NAATI registration and proof of current valid accreditation.

#### 4.0 PRICE BANDING

### Q13 What do you think would be advantages and disadvantages of using a price banding approach?

As mentioned in the response to question 2, price banding would eliminate some of the problems of interpreters undercutting fellow interpreters and/or overcharging clients.

There may however be two accompanying major disadvantages:

a) Price banding will not work without minimum qualification and accreditation standards; and

b) Some interpreting agencies, constrained by price banding, to achieve a profit margin may not remunerate their interpreters appropriately.

### Q14 Do you think price banding would lead to better outcomes for participants? If so, please give your reasons and explain for which services you think price banding would be useful.

Price banding, as a set of 'de facto award rates', would have the potential to create consistency of remuneration appropriate to practitioners' qualifications and experience. In addition, price banding may also provide clients certainty that quality benchmarks are assured.

ASLIA believes appropriate price banding that incorporates the elements outlined in this submission will increase credibility of the interpreting profession and its role in society, and serve as an incentive for future learners to train as interpreters.

#### References

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#### **Appendix A: Outline of NAATI Credentials**

### Source: https://www.naati.com.au/media/1109/outline\_naati\_credentials.pdfhttps://www.naati.com.au/media/1109/outline\_naati\_credentials.pdf

#### **Conference Interpreter (Senior):**

This is the highest level of NAATI interpreting accreditation. It reflects a level of excellence in conference interpreting, recognised through demonstrated extensive experience and international leadership. It encompasses and builds on the competencies of Conference Interpreter accreditation.

#### Advanced Translator (Senior):

This is the highest level of NAATI translating accreditation. It reflects a level of excellence in specialised translating, recognised through demonstrated extensive experience and international leadership. It encompasses and builds on the competencies of Advanced Translator accreditation.

#### **Conference Interpreter:**

This represents the level of competence required to handle complex, technical and sophisticated interpreting, in both consecutive and simultaneous modes, in line with recognised international practice. Conference interpreters operate in diverse situations including at conferences, high-level negotiations, court proceedings or may choose to specialise in a particular area(s).

#### Advanced Translator:

This represents the level of competence required to handle complex, technical and sophisticated translations in line with recognised international practice. Advanced Translators operate in diverse situations and may choose to specialise in a particular area(s) - including translating technical manuals, research papers, conferences, high-level negotiations and court proceedings.

#### **Professional Interpreter:**

This represents the minimum level of competence for professional interpreting and is the minimum level recommended by NAATI for work in most settings including banking, law, health, social and community services. Professional Interpreters are capable of interpreting across a wide range of semi-specialised situations and are capable of using the consecutive mode to interpret speeches or presentations.

#### **Professional Translator:**

This represents the minimum level of competence for professional translating and is the minimum level recommended by NAATI for work in settings including banking, law, health, social and community services. Translators at this level work across a wide range of subjects involving documents with specialised content.

#### Paraprofessional Interpreter:

This represents a level of competence in interpreting for the purpose of general conversations. Paraprofessional Interpreters generally undertake the interpretation of non-specialist dialogues. Practitioners at this level are encouraged to obtain Professional level accreditation.

#### Paraprofessional Translator:

This represents a level of competence enabling the production of a translation of nonspecialised information (e.g. a birth certificate). Practitioners at this level are encouraged to obtain Professional level accreditation.

#### **Interpreter Recognition:**

This credential is an acknowledgment that at the time of the award the applicant has had recent and regular work experience as an interpreter, but no level of proficiency is specified. In order to be granted NAATI recognition, the applicant must provide proof of English proficiency and complete an introductory NAATI workshop or related activity. There is no NAATI testing of a recognition applicant. Recognised interpreters are encouraged to obtain accreditation as it becomes available.

#### **Translator Recognition:**

This credential is an acknowledgment that at the time of the award the applicant has had recent and regular work experience as a translator, but no level of proficiency is specified. In order to be granted NAATI recognition, the applicant must provide proof of English proficiency and complete an introductory NAATI workshop or related activity. There is no NAATI testing of a recognition applicant. Recognised translators are encouraged to obtain accreditation as it becomes available.

#### Language Aide:

This credential is awarded based on success in a NAATI test. The test assesses the candidate's bilingual skills in a 'customer service' scenario. This is not a credential in interpreting or translating and should not be construed as such.