

NUBSLI
Unite the Union
Unite House
128 Theobald's Road
Holborn
London
WC1X 8TN

9th October 2014

Dear Huw Vaughan Thomas

Thank you for your reply of 30th September to our letter of the 19th September 2014.

I note that the letter we sent you on 19th September has been published but the link for your reply does not work so although we have seen it, the letter will not be currently viewable by others.

I would like some further clarity please on questions 3, 5 and 7.

Original Questions 3 a & b:

3a) When is the forecasted date for NRCPD to be completely financially independent from Signature and what is the forecast deficit for 2013/14? We note that in 2011/12 there was a stated deficit of £118k and in 2012/13 a deficit of £105k.

3b) In the 2012/13 annual report it states that:

'Included in the direct costs above is £13,000 for complaint hearing costs. Under SORP 2005 Signature are required to take the total costs for the direction and administration of the charity and allocate a proportion of these overheads to registration as one of the activities of the organisation. In accordance with the recommended practise and in agreement with the auditors this was done in 2012/13 at a rate of 17.4%. For 2013/14 NRCPD and Signature are exploring how best to demonstrate a more detailed attribution of costs.'

Please explain what actions Signature is taking to ensure the finances of NRCPD are more detailed and independent of Signature.

Your reply:

There is no plan to make NRCPD or its finances independent of Signature.

Our objective is to increase public protection by working towards statutory regulation of communication professionals. Any changes to organisational arrangements will be the ones needed to achieve that aim.

Further clarifications and questions for 3:

3a) You have not explained what the deficit for 2013/14 as asked in 3a.

3b) You have not answered what Signature are doing to make their finances more detailed as in 3b i.e. the stated demonstration of a more detailed attribution of costs.

In your letter you also say. "It would be interesting to better understand the motivation for your questions, as it's not clear from your letter. In particular, what led you to think there were plans to make NRCPD independent of Signature?"

Simply put we wish to ensure our profession is properly regulated and that services that employ us have confidence in the register.

I have had conversations with ex-employees of Signature about NRCPD independence. The historical name of the register of sign language interpreters was the Independent Registration Panel and yet it was not, and is still not as part of NRCPD, independent.

Additionally, NRCPD were considering PSA accreditation although you have now said you not be pursuing this but would hold yourselves up to those standards. Options 2a and 3a of the Strengthening Registration work required NRCPD and Signature to be independent of each other.

Options that were also considered were:

In addition, changes in who regulates communication professionals, namely:

- 1. No changes to NRCPD.*
- 2. Strengthen the independence of NRCPD within Signature.*
- 3. Separate NRCPD from Signature.*
- 4. Separate NRCPD from Signature and merge with another voluntary register.*
- 5. Dissolve NRCPD.*

http://www.nrcpd.org.uk/documents/strengthening_registration/extract_from_options_report_online_survey_results.pdf

PSA accreditation standard 7b requires voluntary registers to be 'independent and fair'. As NRCPD has announced, it will be following the standards expected of a regulator. In its July meeting 'the Board reaffirmed its short term aim of meeting the standards expected of a regulator. We are judging

ourselves against objective criteria so we are prepared for the next stage.”

3c) Can you explain which of the 5 above options you are therefore pursuing and why?

3d) Can you explain by what objective criteria you are judging yourself by?

3e) We note that statutory regulation is a stated aim of NRCPD but yet there are no plans to be independent from Signature which would be good practice for a regulator. Can you explain please if there will ever be plans to be independent before pursuing statutory regulation and if not why not?

Original Question 5:

5) We note that the structure of the board is changing to match other regulators. Will the NRCPD seek to ensure any practitioner members do not hold office in a professional membership organisation as NRPSI does?

Your reply:

You state that you “...won't automatically exclude someone who has a position in a professional association. If we did, it could mean the public wouldn't benefit from the skills and experience such a person is likely to have.”

Further clarifications and questions for 5:

5a) As per PSA standard 7b regarding how do you maintain integrity including dealing with conflicts of interest?

5b) There are many interpreters with the appropriate skills and experience who do not hold positions in professional organisations.

5c) I note from previous NUBSLI correspondence that recruitment of new board members is subject to the approval of the NRCPD board. Will the board members need approval by the Signature board or will this process be wholly run by NRCPD?

Original Question 7:

7) ...Given that there is a national framework agreement being discussed by the Crown Commercial Service due to roll out January 2015, what work has NRCPD done in ensuring that only registered professionals will be used?

Can you explain what work is currently being done to ensure standards are maintained for the Deaf community and interpreters are able to work at sustainable rates.

Your reply:

“...In the same way, we are engaging directly with the Crown Commercial Service directly about the new [language service framework agreement](#). We are, of course, saying the professional requirements for non-spoken interpreting should be registration with NRCPD.

But our motivation for that is public protection. How much interpreters are paid only becomes an issue for NRCPD if it has a negative effect on public protection.”

Further clarifications and questions for 7:

7a) Could you detail exactly what work has been done with the CCS given that NRCPD did not attend the industry boot camp in June?

7b) Will NRCPD be involved in any monitoring or evaluation of the contract and how will this be carried out?

7c) Are you working on any of these areas in connection with the national framework agreement (e.g. setting of minimum fees, lobbying, bidding, monitoring and evaluation)?

7d) What representations have you made to DWP about the Access to Work scheme with regard to interpreters pay, terms or working conditions?

Please publish this letter in the published information section of the NRCPD website. We would be grateful for a reply at your earliest convenience.

Kind regards



Jennifer Smith
Chair of NUBSLI, A Branch of Unite the Union

cc Jim Edwards, Signature
cc Dan Sumners, Signature