

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

20th January 2015

Dear Huw Vaughan Thomas

Thank you for your reply of 29th October to our letter of the 9th October 2014.

Your reply indicated that you did not want to answer the questions in writing and, at a later date you offered the idea of a meeting with NUBSLI members. We would like to thank you for the offer but following a consultation, the membership has voted in favour of the union continuing to seek a written reply.

As the letter on 9th October contained questions that had remained unanswered from the letter on 19th September, I have rewritten the letter for ease of reply and to ask some other questions which are pertinent at this time.

Independence from Signature:

You asked on the 30th September in your reply "what led you to think there were plans to make NRCPD independent of Signature?" We explained in the letter of 9th October: Firstly, I have had these discussion previously with ex-members of staff at Signature/NRCPD. Secondly, it is usual for a regulator or register to be independent. Your work on strengthening regulation talks of PSA standards and making NRCPD fit to pass a PSA audit. I draw your attention to the PSA standards I outlined in the letter of 9th October 2014.

You may like to note that NRPSI become independent of CloL in 2011 for that reason. Historically NRCPD was known as the Independent Registration Panel yet it has never been independent from Signature.

Please detail the reasons why NRCPD and Signature are not planning to become independent.

Financial Transparency:

a) What is the forecast deficit of funds between NRCPD and Signature for 2013/14?

In previous years:

2012/13 deficit of 105k

2011/12 deficit of 118k

2010/11 surplus of 36k

2009/10 surplus of 18k

b) There is a discussion about the rules for SORP in the 2012/13 annual report and it says, "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, transparent and independent of Signature.

Governance:

When can we expect the announcement of the recruitment your board members?

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

Strengthening Registration/Statutory Regulation:

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?

National Framework Agreement:

NUBSLI has been making representations to the Crown Commercial Service in various areas. One of them being that minimum standards can be chosen by the customer rather than be stated as mandatory in the main framework. As the body responsible for safeguarding the Deaf community, what work are you doing to ensure the framework is robust for suppliers and their sub-contractors in choosing registration as the minimum standard allowed?

We note level 6 BSL is still listed in qualification without due note to IIDPs for Trainees and we have still not seen a draft which confirms removal of BSL levels 1 - 4.

We note that Signature makes representations to the DWP and other government departments regarding interpreters and other Language Service Professionals. Why is there no work being done independently by NRCPD?

Qualifications:

Are there any further plans to draw up new qualifications and programmes such as introduction to interpreting (as seen in the new Level 4), any new CSW courses and do these contain any interpreting elements or plans for any other programmes such as apprenticeships for interpreters?

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