

28 MAR 2017

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27 March 2017

**Director and Registrar, NRCPD**

Dear Alan,

We are writing to you as the main BSL/English interpreting organisations: ASLI, NUBSLI and VLP. Collectively we represent the vast majority of trainee and fully qualified practising interpreters in the U.K.

We would like to start by acknowledging the changes that NRCPD are currently making to achieve separation from Signature, and use the opportunity that this reorganisation presents to offer our expertise and experience to ensure that our profession's regulatory body is the best it can be, and one which works to safeguard the Deaf community.

We have taken the liberty of creating a list of points that we hope will be incorporated into the reorganisation. This should ensure that the previous model of NRCPD is improved upon to the benefit all stakeholders.

Firstly, we would suggest that a vital component of NRCPD's work should be the promotion of the register with all parties involved in interpreted assignments, particularly service providers and statutory organisations. As well as this, NRCPD should consider setting up a Consumers' Forum to match its Practitioners Forum, to bring the organisation closer to the communities it serves. Furthermore, Deaf people should be sought as staff and Board members whenever possible.

The previous model did not allow for this education regarding the register, and elucidating the differences between an RSLI and a TSLI was left to interpreters and the Deaf community. In creating the opportunity for NRCPD to take ownership of this responsibility, the register is legitimised. Promotion of the register will also raise its profile with stakeholders who may not traditionally be aware of the Deaf community's rights to quality interpretation.

A shared interest of all our organisations, along with NRCPD, is protecting the public. We can all agree that in a perfect world the 'fit to practice' clause within NRCPD's Code of Conduct would be enough to ensure that there were no unscrupulous interpreters on

the register. Unfortunately, this is not the case, so we invite NRCPD to set up measures to explore alternative ways to safeguard the public. In relation to this we feel increased communication in the numbers of concerns and complaints received and actions taken will increase our members' confidence in NRCPD's ability to regulate the profession and thus protect the public.

Given the change in fees and NRCPD separating from Signature, it seems the perfect opportunity for financial clarity between NRCPD and its registrants. We understand that as an arm of the registered charity CACDP, NRCPD are not legally required to publish detailed financial records. However, doing so as an act of goodwill would harbour trust between interpreting professionals and those holding the register, as well as outlining and clarifying the costs involved.

There is some confusion regarding the roles and responsibilities of the NRCPD team. It has been previously brought to NRCPD's attention that no other register has a registrar who is not also part of the profession they regulate. We understand NRCPD have clarified that the registrar position within NRCPD is an 'administrative' role. To save confusion moving forward, could we suggest that a clear flow chart outlining who fulfils which role and what that role involves is made available to registrants.

Finally, we would like bring your attention to that of accessibility; it seems that NRCPD's current website and social media content consists predominantly of written text. As an organisation that holds the register for professionals who work to promote access for the Deaf community this seems somewhat inappropriate. We hope that during the reorganisation process NRCPD takes the opportunity to employ translators to produce BSL video clips to rectify this. Current good practice is to employ qualified Deaf translators whenever possible.

We look forward to hearing your response to our suggestions, and hope that this letter is received in the manner in which it was written - that of respect and with a shared aim to better the profession.

Yours Sincerely,

Association of Sign Language Interpreters (ASLI)

National Union of British Sign Language Interpreters (NUBSLI)

Visual Language Professionals (VLP)