

29 February 2016

Dear ANP

Many thanks for your detailed feedback following our statement of regulatory intent. I've answered your questions as best I can, but it will be useful if we meet to discuss these issues further. In particular, I'd like to agree how we can work together to make sure there are clear and agreed standards, and routes to registration for notetakers.

It is indeed statutory regulation we are pursuing, whether or not the regulator, in the end, is NRCPD. That means we want it to be illegal for an unregistered person to use the title or do the job of an interpreter for deafblind people, a lipspeaker, notetaker, sign language interpreter, sign language translator or speech to text reporter.

We don't know exactly how many deaf people came to our meetings about our plans for statutory regulation or how many we have spoken to about it, but we know it's not enough. That's why one of the key things we will be doing over the next couple of years is improving the feedback we get from them. We will appreciate ANP's help in reaching the clients of notetakers.

Regarding registers, there is a difference between a regulatory register and a membership register. A regulator exists primarily to protect the public by making sure standards are met. It's Register(s) list the professionals who have met those standards. A membership or professional register exists primarily to help people find the support they need.

A regulator maps qualifications against standards, checks the qualifications of its Registrants and asks them to make legally binding declarations. If they allegedly break the Code of Conduct there will be an investigation and they could be removed from the Register or have other sanctions imposed on them.

A professional association does not map courses against standards, does not provide an independent complaints process, and does not ask people to make legally binding declarations. Most associations don't have the financial resources to do the job of a regulator. But even if they did, it would be self regulation, which does not provide the same level of public protection.

NRCPD registration therefore protects the public in a way membership of a professional association does not. For example, if a client has a complaint against a Registrant, we have the time and resources to conduct a thorough and independent investigation.

Statutory regulation would not stop any organisation producing a list of professionals for membership, marketing or other purposes. But that list would not have the same status as the Register, which is the same as the current situation.

The purpose of our Register is to let the public know who is suitably qualified to provide notetaking support to a deaf or deafblind person. If the title 'notetaker' was protected, you are right that the fact notetakers don't only work with those people would need to be taken into account. In the same way, we are working with the spoken interpreting field regarding statutory regulation of interpreters.

We agree it is worrying there is a limited route to registration for notetakers. As it is in all our interests, we look forward to working with ANP and awarding bodies to develop plans that make sure there are routes available.

We are encouraged by Signature's course that will enable people who currently hold the CACDP level 2 qualification to register. We know they are exploring whether that course will also be suitable for people with OCN and SQA qualifications. Signature has also informed us they intend to make a level 3 qualification available in the near future.

We will of course map any course any awarding body asks us to against the standards, which are currently expressed in the CACDP level 3 qualification. For example, ANP approached us about OCN qualifications, but OCN have not provided us with the information we need to map the qualification. Even if NRCPD were the statutory regulator, access to registration would be restricted on the basis of the standards, not the awarding body.

We haven't done any recent research into how notetakers currently practice in the UK or what their clients expect. But complaints are judged against our Code of Conduct, which was recently redrafted following extensive consultation with the professions.

Please address further correspondence to:

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We will therefore be pleased to work with ANP to make sure the standards against which we assess qualifications are the right ones. We know some work was done in the past that might be a starting point. Our role will be to facilitate the creation of standards, rather than write them. But we will support any consultation, and consider contributing financial resources if they are required.

ANP, along with all the professional associations, is a valued partner of NRCPD. You are a member of the Practitioner Forum, invited to all our events, regularly consulted, and can access the Board papers via the website. You are also welcome to raise issues directly with Board members and staff. If there is anything else we can do to make sure you feel the relevant issues are being addressed, we're happy to discuss them.

If anything isn't clear, please feel free to contact me. You might also want to read the updated frequently asked questions at <http://www.nrcpd.org.uk/statutory-regulation>.

I look forward to hearing from you about a meeting.

Kind regards

Kate Price

Registration Service Manager

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