

5 April 2012

Alan Haythornthwaite
Visual Language Professionals
Steering Committee

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Dear Alan

Thank you for your letter of 24 February 2012 regarding the strategic decisions the NRCPD Board made about annual revalidation at its November meeting last year.

The signed agreement we have between our organisations sets out the roles we have agreed to undertake to make sure that:

- professional communication services are easily publicly available in the UK;
- service users and purchasers have a service quality and reliability guarantee.

The job we have been given is to safeguard the well-being and interests of people who rely on the services provided by communication professionals. We do that by setting the standards required for professional practice in the disciplines we regulate and we monitor the application of those standards by the professionals we register. Our objective is to make sure that only communication professionals who are properly trained and do their job safely and consistently can carry an NRCPD photo ID card.

Details of the Board's membership are published on our website. Each of us has been appointed by an open recruitment process, and there is no objection to a practising communication professional with the right skills and experience serving on the board. Our current membership is a reflection of the applications we have received, not an active decision to exclude individuals from certain backgrounds. As you know our agreement sets out that NRCPD will not seek to represent the views of working interpreters, so I'm surprised you mention this as a factor that might limit our ability to do that.

That said, we are in the process of considering a second batch of applications from our autumn recruitment and will consider the benefits of giving extra weight to any practising professionals amongst their number when we appoint.

The agreement we have with you also sets out that NRCPD is not a membership organisation. To make sure that is absolutely clear to everyone, we included our intention to remove the term 'member' from our category titles in *Setting the Standard*, our consultation document. We received generous support for the proposal and no substantive contribution that caused us to consider amending it. We agreed to implement the decision from 3 January and informed all regulated professionals accordingly.

As a Board we take seriously the views of interpreters and other communication professionals in our decision making. We consider their views alongside the views of employers, training providers and most importantly, those who use the services.

There are several structured routes for working professionals to give us their views:

- Directly - as individual regulated professionals;
- By taking part in our surveys and consultations;
- Through their professional body's participation in the NRCPD Practitioners' forum, where the full range of regulated professionals' views are discussed and fed formally and collectively into our decision making; or at the bi-annual meetings each professional body on the Practitioners' Forum has with our staff team as part of our agreement.

Board discussions and decisions are informed by each of these routes, members' own knowledge and experience, and information we ask our staff team to provide. As always at this level, each decision we make to advance our strategic aims seeks to balance principle, practical reality, and the resources we have available. The constant is our determination to make sure each decision improves choice, access and everyday communication experiences for deaf and deafblind people in the UK.

Turning to the substantive content of your letter. I am pleased you have stated publicly that VLP supports the concept of ongoing professional development. It is good to know you share our view that the development work individuals undertake should be self-directed.

The continuous process of education for professionals begins at a time before undertaking formal training and ends only after they retire from practice. Post-qualification continuing education is an accepted mark for modern professionals and one of the criteria the Privy Council has for formal recognition of professions. So CPD is an absolute requirement if we are to protect the titles of the professions we regulate by formally reserving use of terms like Sign Language Interpreter for only those who are appropriately trained. The small burden on each individual regulated professional is outweighed by improvements to their own practice, the benefits to the service the public experiences, and the standing of the profession as a whole.

Our decision to require Registered communication professionals to invest in their own professional development dates back to 2007 and the recommendations of The Future of Registration consultation report. Since January 2010 all regulated professionals have signed up to abide by our published Code of Conduct. Section five of the code (available at www.nrcpd.org.uk/codeofconduct and attached for your reference) commits individuals to improving their professional standards and status through continuing professional development.

Revalidation enables us to formally monitor compliance with that requirement and its impact. Making sure that every Registered communication professional invests annually in their own development will result in a more consistently high standard of interpreting experienced by service users. For those who already meet the commitment they have made by agreeing to abide by the Code of Conduct there will be no change, except to record what they do. Those who do not meet that commitment currently will invest a minimum of an hour a month in their professional development, if they wish to maintain their registration. Excluding from the register those who choose not to keep their skills up to date will raise the general standard of service the public can expect from NRCPD Registered interpreters.

You rightly state that it is only in this instance that our decision differed from the majority response to the consultation. Your inference is that we in some way disregarded the views of interpreters in that decision. That is an oversimplification of a careful consideration process and conveniently ignores other examples where we amended our original proposal based on the responses we received. We considered the issue very carefully, paying particular attention to the comments and suggestions that lie beneath the headline you quote as the report clearly states. We accepted the point made repeatedly that any

action other than refusing registration for those who do not meet the revalidation requirement would amount to a voluntary system and would therefore result in no change.

In making our decision on the issue we accepted comments and suggestions that outlined potential difficulties of introducing the full requirement immediately. In response we agreed a three-year implementation schedule requiring 2 days or 12 hours in year one, 4 days or 24 hours in year two, and five days only in year three. We accept the point you made to us separately that the implementation schedule we have published is not linear and will amend from 35 to 30 hours the year three and ongoing requirement.

We considered many different models of revalidation and continuous professional development. We chose the simplest possible, deciding to count hours of development work rather than establish a scheme that weights activities, prescribes training requirements, or includes a periodic assessment of skills. This way we allow each regulated communication professional who currently invests in their professional development to continue as now, making their own choices about the development activity they undertake. Initially at just twelve hours for the year, the requirement to record professional development is not onerous on any professional. The scheme itself will be one of the tools we use to measure its impact.

You know that the board has had many discussions on this issue since NRCPD was established in 2009. We have benefitted from debates amongst other practitioners, with their professional regulators and the public. In three years we have taken account of many different points of view. As a board we are content that the conclusion we have reached is balanced, carries the majority support of stakeholders, and is in the best interests of those we serve.

The case you make has been made by others and we have listened to that argument throughout our long deliberations. In the absence of new evidence or arguments that the board has not previously considered we see no reason to revisit our decision. Introduction of the revalidation scheme will go ahead in 2013 as published. We will review the progress made in implementation at regular intervals and invite comments through the appropriate channels as required.

I am very grateful for the time you have taken to set out your concerns on this matter so clearly. Friends and colleagues do occasionally disagree and we look forward to strengthening the working relationship between our organisations as we go forward.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Huw Vaughan Thomas'.

Huw Vaughan Thomas
NRCPD Chair