

NRCPD Board Meeting 3 November 2014

Present

Huw Vaughan Thomas (Chair), Craig Crowley, David Wolfenden, Heather Fiskin, Jenny White, Michael Guthrie, Sandra Verkuyten, Stuart Anderson

In attendance

Jim Edwards, Lindsay Foster, Dan Sumners (minutes)

Communications support

Jean Gough, Peter Shilston, Darren Townsend-Handscomb

1. Welcome and apologies

The Chair welcomed attendees and apologies were received from Gill Croft.

2. Declaration of Interest

None were received.

3. Chair's and Chief Executive's Remarks

3.1 The Signature Board had commissioned a review of governance, including the relationship with NRCPD. A draft report had been received by the Search and Governance Committee. It would be discussed initially at the 27 November Signature Board meeting but major decisions were unlikely until after the Board's March 2015 meeting. The report would be shared meantime with the NRCPD Board and comments would be welcome.

3.2 The Chair (HVT), Chief Executive (JE) and Senior Policy Adviser (DS) had attended the ASLI conference. The Chair and David Wolfenden had hosted a question and answer session. DS had delivered a workshop on Continuing Professional Development.

One item that was raised was a belief that NRCPD would not receive complaints from individual registrants about the standard of other registrants without additional evidence. It was explained that we wanted to receive informal comments as well as formal complaints.

- 3.3 BD Consulting UK is managing the recruitment of registrant Board members on a pro-bono basis. The deadline for applications is 5 November. Registrant Board members would be recruited for their skills and experience, not as representatives. As with any Board there would however be a desire to see a spread of experience. Similarly when lay members are recruited it would not be specified that a fixed proportion would have to be service users, though the Board would need to include service users.
- 3.4 The Chief Executive had reopened discussions with the Scottish Association of Sign Language Interpreters (SASLI) about a reciprocal arrangement to recognise registrants. The discussion followed SASLI changing their registration requirements. Previously SASLI had registered some people whose qualifications did not meet the National Occupational Standards.

4. Minutes of last meeting and action

The minutes of the meeting on 23 July 2014 were approved.

The following comments were noted:

- SV and DS would meet to discuss a statement of regulatory intent. **Action: SV/DS**
- The target date for setting up training days to consider a reflective practice model of CPD would be extended to March 2015 to allow for wider consultation: **Action: DS**
 - Heather Fiskin would join the group developing the training day;
 - SASLI used an outcomes based approach to CPD. It could be useful to explore it.
- Following stakeholder feedback, DS recommended extending the deadline for responses to the surveys about the proposed Code of Conduct and Complaints Process. The Board agreed to extend the deadline to the end of December. **Action: DS**

5. Governance

The Board noted the Chair's update to the Signature Board. It would also be published as a public report in the New Year once the audit of the accounts was available.

The Board noted the Signature letter of authority for 2014-15.

6. Return to Practice

This had first been presented to the Board at its meeting on 23 July 2014. The Board had then agreed to endorse the Policy but as Appendix B (CPD guidance) related to recommendations in Item 8 of the CPD Audit Report, it could not be put into full effect until those recommendations had been considered.

Following that meeting further work had been undertaken to simplify and clarify the policy and there seemed, following reflection, to be no reason why it should not be aimed at any professional wanting to register after a break from practice.

It had therefore been redrafted as a practice breaks policy. Its appendices – template CPD profile and CPD guidance – were removed, as they were not part of the Policy. They were replaced by a reference to the CPD handbook that would be available on the website. This would mean only one document had to be updated as it was developed.

The draft policy was presented to the meeting of the Practitioner's Forum on 30 September 2014. Suggested changes had been incorporated.

The Board agreed:

Action: DS

- points 2a, 2b and 2c would be reordered;
- paragraph 22 would be deleted;
- references to "an experienced NRCPD-registered communication professional" would be replaced with "an A1 assessor in the same professional category (or suitably experienced communication professional in the case of STTRs, lipspeakers, notetakers and interpreters for deafblind people)";
- The redrafted policy would be circulated by email for final agreement.

7. Communications 2014 / 15

DS reminded the Board that in 2013-14 it had focused on the development of its communications about statutory regulation. As it was central to the work of NRCPD our communications would naturally continue to promote the message that it would be beneficial for all stakeholders.

However for 2014-15 the Board should focus on developing communications not just about the future but also about the work we were doing. This meant being bolder in our proactive communication, and more robust when reacting to questions and comments.

One issue that still had to be addressed was the understanding of what NRCPD was for. In particular, some communication professionals viewed themselves as 'members'. Whilst their opinions were clearly important, they were only one of our stakeholder groups. Our main beneficiaries are the people who use the services of our registrants.

Misunderstandings about NRCPD's role, had led some to call for a new register to be run by the profession itself. There seemed to be a lack of understanding that this would provide less public protection due to it not being independent in the way NRCPD was, and would not meet the test expected of an independent regulator.

NRCPD had also begun to receive more frequent and formal requests for information from stakeholders. As we made more changes they were likely to increase. Over the year we had improved the speed with which we responded to such requests, but we had not formalised the process.

As a result of these observations DS recommended NRCPD should:

- make its central message clear: we exist to protect the public and everything we do has that as its primary aim;
- in a more systematic way, seek the views of people who use the services of communication professionals about:
 - the need for registers to be independent of the profession;
 - our effectiveness in protecting people; and
 - our plans for statutory regulation;
- formalise how NRCPD respond to external requests for information and introduce a quarterly email update for stakeholders.

The Board agreed these recommendations and suggested in addition:

- making increasing engagement with service users a priority;
- publishing newsletters more frequently than every quarter;
- holding more face-to-face meetings with stakeholders;
- making more use of social media, including setting up a page on Facebook.

The Senior Policy Adviser would draft a communications strategy for 2014/15 and circulate it via email.

Action: DS

8. Correspondence

Since the last meeting three requests for information had been received from the National Union of British Sign Language Interpreters (NUBSLI), a branch of Unite the Union. The first two letters and responses had been published on the website.

A response to the most recent request had been sent asking for a meeting. The Chief Executive and Senior Policy Adviser would meet with NUBSLI representatives. After the meeting a formal response to the letter would be drafted.

9. Market Development

There had been several recent efforts to promote NRCPD registration as the minimum standard for communication and language professionals providing services to the public sector.

9.1 Access to Work

The Department for Work and Pensions' Access to Work scheme now requires NRCPD registration numbers to be included on invoices submitted by sign language interpreters.

Unfortunately some advisers had been refusing to pay invoices retrospectively. That had caused some problems, but written assurance had been received from the Head of Access to Work that payment would not be withheld retrospectively. Customers would be told NRCPD registration was required for future invoices to be paid.

However, some Access to Work advisers had been asking for proof of qualification in addition to NRCPD registration. It has been explained to them why that is unnecessary, and NRCPD has produced [an article explaining why proof of NRCPD registration made it unnecessary to check qualifications](#). This includes a letter registrants could download and send to Access to Work advisers.

DS has been told some advisers have disregarded the letter and is following this up with the Head of Access to Work.

9.2 Agencies and unregistered communication and language professionals

NRCPD is sometimes contacted by colleagues about agencies that use unregistered communication and language professionals. We recently published [an article reminding agencies of the importance of using only registered communication and language professionals](#). Again this includes a letter people could download and send to agencies.

9.3 Framework agreement for the provision of interpreting and translation services

The Crown Commercial Service (CCS) was creating [a framework agreement for the provision of translation and interpretation services](#). It included 'non-spoken' interpreting.

The specification originally stated the requirement should be specified by the body issuing the call off, but that it could vary from NVQ level 1 upwards. Since July NRCPD has been in contact with the CCS. Our focus has been to make sure the professional requirements for "non-spoken" interpreting included registration with NRCPD. That would mean every call off would state communication professionals supplied would have to be registered with NRCPD.

It was not acceptable for trainee sign language interpreters to take on assignments in some areas, such as the justice system or health. If call offs were issued under the framework agreement in those areas it would be important to make sure they stated only registered sign language interpreters must be used.

The CCS had confirmed the requirements would be changed to the requirement for registration with NRCPD. The final draft of the specification was due to be published on 29 October but had not been received by the time of the meeting.

There had been confusion amongst stakeholders about what a framework agreement was and NRCPD's role in the development of this one. An article had been drafted and passed by the CCS to check accuracy. Unfortunately their internal processes meant it has not been published yet.

If the specification was acceptable NRCPD would publish an article welcoming it and explaining the role we played in its development.

9.4 NHS England accessible information standard

NHS England was consulting on a draft accessible information standard. It would state requirements and recommendations which health and social care organisations must follow.

It included a section on quality. It currently stated:

- Professionals providing communication support, interpretation and translation **MUST** be suitably qualified to perform the role effectively, including having the necessary knowledge and skills to handle clinical, sensitive and personal information appropriately. Organisations **MUST** ensure that British Sign Language interpreters and deafblind manual interpreters used in health and social care settings have:
 - appropriate qualifications;
 - Disclosure and Barring Service (DBS) clearance;
 - signed up to a relevant professional code of conduct.
- In a medical setting, British Sign Language (BSL) interpreters used to provide face-to-face or remote interpretation **MUST** be qualified to Level 6.
- DS would submit a response welcoming this, but saying it should state:
 - communication and language professionals used should be registered with NRCPD;
 - the qualification requirement for all communication and language professionals should be those required for registration with NRCPD; and
 - the registration requirement should be included in contracts.
- DS had also been helping to draft the UK Council on Deafness (UKCoD) response to the consultation which would include the same information.

10. Operational report

10.1 Recruitment of staff

Advertisements were run three times for a Registration Service Manager to oversee the NRCPD function within Signature. Interviews were held in the week ending 17 October. Three candidates met the Chief Executive on 20 October.

The successful candidate had experience of a challenging customer service environment and clearly demonstrated strong communication skills. She would start working with us on 1 December 2014.

Operational activity had been covered by the Signature team since the departure of Registration Support Officer. The need for that post would now be reviewed.

10.2 Routes to Registration

10.2.1 Notetaking

In 2012 the registers were closed to people with the Level 2 notetaking qualification and the minimum required level was set at a Level 3 qualification.

We reopened the register for notetakers with the Level 2 qualification for a few months in 2013. Once this window closed the only route was to achieve the Level 3 notetaking qualification which wasn't offered by any centres. This resulted in two notetaking registers – one for Level 2 and one for Level 3.

There were still no available notetaking courses at any level and Signature notetaking qualifications were no longer available.

Signature had created a Level 3 equivalent course for Level 2 notetakers to gain entry to the Level 3 register. This was being mapped but Signature hoped to offer this course throughout the country from January 2015. The result would be more Level 3 equivalent notetakers available.

10.2.2 Lipspeaking

The new Level 3 lipspeaking qualification was currently available from Signature and offered at one centre in Manchester. This qualification was being mapped with a view to being a route to registration from this winter. It would result in more registered lipspeakers being available.

10.2.3 Speech to Text Reporting

There was currently no route to registration for speech to text reporters. A solution was being developed. A timescale would be produced. **Action: LF**

10.3 Technology

As part of the approval process for registration being allocated to the Signature team a number of the processes were being reviewed. In particular the process for approving TSLI applicants was being streamlined and automated. It would result in a quicker application process.

The registrant portal was also under review to make it more user friendly and intuitive.

The Signature development team was exploring the possibility of a mobile application to increase access to registered professionals.

10.4 Complaints

Six complaints had been handled by the team in 2014.

10.5 Registrants

The number of registrants was as in the table below.

	30/09/2013	30/09/2014	Variance
RSLI	837	884	47
TSLI	227	255	28
RSLT	11	13	2
RLIP	36	32	(4)
RSTT	23	26	3
RIDB	16	16	0
REN	11	10	(1)
RMN	12	12	0
TSLT	0	3	3
Total	1173	1251	78

12. Any other business

The main point of contact for all NRCPD enquiries was enquiries@nrcpd.org.uk.

Once a new complaints process is in place the Board would discuss how to resource complaints in the future. For the time being Signature would continue to allocate funds as necessary.

13. Date of next meetings:

The next NRCPD Board meetings will take place on 2nd March 2015 and 20th July 2015.

.....
Huw Vaughan Thomas
Chair, NRCPD