

NRCPD

The National Registers of Communication Professionals
working with Deaf and Deafblind People

30 September 2014

Jennifer Smith
Chair
NUBSLI
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Dear Jennifer

Thank you for your letter of 19 September 2014. You'll find the answers to your questions attached. I hope I've covered everything, but let me know if there's anything else I can tell you.

I would have included a copy of the minutes of the last Board meeting, but they haven't been approved yet. When they are, I'll make sure they're sent to you.

It would be interesting to better understand the motivation for your questions, as it's not clear from your letter. In particular, what led you to think there were plans to make NRCPD independent of Signature?

It would also be useful because, as you know, we want to improve our community engagement. Insight into what our stakeholders want to know and why will help us design appropriate communications.

Kind regards



Huw Vaughan Thomas
Chair

Responses to questions put to NRCPD by NUBSLI in a letter dated 19 September 2014

- 1. The Terms of Reference of the NRCPD board (November 2011) state that Signature will send a Letter of Authority to NRCPD each July. Could we see copies please of all letters of authority?**

We don't publish the letters of authority as they are a communication between the board of Signature and its subcommittee, NRCPD. However, I think the [Authority and Terms of Reference](#) [PDF] document and our [annual report](#) [PDF] make our objectives clear.

- 2. One board member, who will be a member of the Signature Board of Trustees, will be appointed directly by Signature. Can we ask in what function Jim Edwards attends NRCPD board meetings when Craig Crowley MBE fulfils this role?**

As is usual practice, Jim – and other staff as necessary - attends meetings of both the Signature and NRCPD boards (but is a member of neither). That's because, as chief executive, he's responsible for making sure we have the information we need to make decisions and for carrying them out.

- 3a. When is the forecasted date for NRCPD to be completely financially independent from Signature and what is the forecast deficit for 2013/14? We note that in 2011/12 there was a stated deficit of £118k and in 2012/13 a deficit of £105k.**
- 3b. In the 2012/13 annual report it states that: 'Included in the direct costs above is £13,000 for complaint hearing costs. Under SORP 2005 Signature are required to take the total costs for the direction and administration of the charity and allocate a proportion of these overheads to registration as one of the activities of the organisation. In accordance with the recommended practise and in agreement with the auditors this was done in 2012/13 at a rate of 17.4%. 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 and independent of Signature.**

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3c. Is there a strategy to work towards the independence of NRCPD from Signature and if so what is this? Please send us a strategy document if there is one.

There is no plan to make NRCPD or its finances independent of Signature. Our objective is to increase public protection by working towards statutory regulation of communication professionals. Any changes to organisational arrangements will be the ones needed to achieve that aim.

4. Who is the current NRCPD registrar? If the post has yet to be filled when is it likely the new registrar will be in place and what are your interim measures?

As I told your Branch Secretaries Nicky Evans and Wes Mehaffy, in [my letter of 4 September 2014](#) [PDF], we hope to recruit a new Registrar before the end of the year. But an appointment will be made only when the right candidate is identified. In the meantime other staff are doing the work of NRCPD.

5. We note that the structure of the board is changing to match other regulators. Will the NRCPD seek to ensure any practitioner members do not hold office in a professional membership organisation as NRPSI does?

The structure of the Board, subject to agreement by the Signature Board, will be four registrants, four non-registrants and a non-registrant chair. When we recruit our only concern will be to seek people who will help us achieve our objectives.

We therefore won't automatically exclude someone who has a position in a professional association. If we did, it could mean the public wouldn't benefit from the skills and experience such a person is likely to have.

6. When are the minutes of the 23rd July 2014 board meeting due to be published? We request that publication of the board minutes are not delayed until the next board meeting is due (in this case 3rd November 2014) but that they be published within a reasonable timescale after the board meeting e.g. one calendar month.

The [minutes are published on our website](#) after they are approved.

7. One function of the NRCPD as stated on the website is to, 'We campaign to promote the benefits of using only NRCPD Registered professionals in the public sector. We do this by lobbying public service providers and government departments, encouraging them to guarantee provision of NRCPD Registered communication professionals when deaf and deafblind people access their services.' Given that there is a national framework agreement being discussed by the Crown Commercial Service due to roll out January 2015, what work has NRCPD done in ensuring that only registered professionals will be used? We understand that NRCPD were fundamental in ensuring that in 2011 NRCPD registered interpreters were standard in the HMCTS framework agreement. NRCPD have not been present at the stakeholder events although NRPSI have been. Can you explain what work is currently being done to ensure standards are maintained for the Deaf community and interpreters are able to work at sustainable rates.

You're right to say NRCPD had a central role in making sure the [HMCTS framework agreement for language services](#) [PDF] requires the use of registered sign language interpreters. [That agreement is being renewed](#), and we have no reason to think the requirement won't be included in the new agreement.

In the same way, we are engaging directly with the Crown Commercial Service directly about the new [language service framework agreement](#). We are, of course, saying the professional requirements for non-spoken interpreting should be registration with NRCPD.

But our motivation for that is public protection. How much interpreters are paid only becomes an issue for NRCPD if it has a negative effect on public protection.