

04 February 2015

Dear NUBSLI member

I am writing to you regarding recent questions put to NRCPD by your chair.

As you may be aware, I received a letter from your chair on 19 September. I replied on 30 September and [both letters were published on our website](#).

I received a subsequent letter on 9 October. I replied on 29 October and again published both letters.

In my reply I said that whilst I could provide answers to the additional questions posed by your chair, they were based on some simple misunderstandings about NRCPD and Signature. I thought it would be more effective for us to meet and have a discussion.

Unfortunately your chair was unable to meet us during working hours. We therefore suggested an evening meeting which the wider NUBSLI membership could also attend for a more open discussion.

Having been told by your chair that following consultation you would prefer a written response to the questions posed on 9 October, please find it attached. However, I still think it would be better for both our organisations to meet and begin a constructive dialogue.

For example, in a letter dated 20 January your chair attached your list of 'asks'. Two of them related to representation of interpreters and deaf people on the Board. But unlike NUBSLI, NRCPD is not a representative organisation. Each of the Board members is recruited for their skills and experience. Of course, the views of our stakeholders are important to us, but we do not rely on elected representatives to learn about them.

Confining any dialogue to the writing of letters in the manner of freedom of information requests and the making of demands does not make for a positive working relationship between our organisations. That is disappointing because communication and language

professionals are central to our plans for strengthening registration as we work towards our goal of statutory recognition, and we want to work with you to develop them.

Kind regards

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

Huw Vaughan Thomas  
Chair

## **Responses to questions put to NRCPD by NUBSLI in a letter dated 9 October 2014**

### **3a-e: finances and governance**

NRCPD does not have a 'deficit' as registration is an activity of Signature. In 2012/13 £104,645 was allocated (net movement of funds) to registration. The audited figure for 2013/14 will be available when the annual report is published..

The independence referred to in the name 'Independent Registration Panel' referred to independence from the profession, not CACDP (as Signature was known at the time) or any other particular organisation. Whilst it is of course important that the profession is involved in its regulation, to meet the tests required of any statutory regulator seeking to regulate in the public interest it is necessary for that "lay" people should be in the majority.

In the future it may be appropriate for NRCPD to become an independent organisation. At the moment we feel the best thing is to leave things as they are and review and revise our governance arrangements as part of our efforts to strengthen registration..

### **5a: how do you maintain integrity including dealing with conflicts of interest?**

As with any board or committee, members are required to declare potential conflicts of interest. In addition we publish agendas and minutes of meetings, correspondence and an annual report.

### **5b: not a question**

### **5c: Will new NRCPD board members need approval by the Signature board or will this process be wholly run by NRCPD?**

Currently the Signature Board nominates one member to sit on the NRCPD Board. Otherwise the process for selecting new members is managed by the Chair of NRCPD; the final stage of this process involves a joint interview both by the Chair of NRCPD and the Chair of Signature Board or his representative. Interviews for 4 new registrant members took place on 30 January and an announcement will be made soon.

### **7a-d: the CCS framework agreement for the provision of language services**

We have confined our involvement with the development of the framework agreement to the issue of the qualifications required of communication and language professionals.

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

Neither NRCPD nor Signature have made representations to DWP about the Access to Work scheme with regard to interpreters pay, terms or working conditions, these matters being outside a regulator's terms of reference

We have told the Crown Commercial Service, via the civil servant leading the work, what changes need to be made to the qualification specification for non-spoken interpreting. As stated in our letter to you dated 30 September 2014 the specification should be registration with NRCPD or equivalent.

We understand there are concerns about the December draft of the framework agreement. However, Appendix 4 has been changed.

- The list of interpreter qualifications below level 6 has been removed. Stakeholders were informed of that via email on 11 December. We feel there is no need to list any qualifications but state registration with NRCPD or equivalent is required.
- We have not seen the most recent draft yet, but we have been assured NRCPD registration or equivalent will be a requirement. It will not be a choice for customers.
- Where it says customers, "shall specify the minimum standards acceptable at the time of booking along with any minimum qualifications, skills, competence, experience, and security clearance (e.g. minimum typing speed of words per minute for palantypists)", the intention is minimum standards above and beyond those required for NRCPD registration. We have been assured the next draft will make that clear.

There are no plans for NRCPD to be involved in any formal monitoring or evaluation of the framework agreement or call offs issued under it. But we will be concerned to make sure their use does not reduce public safety.