

## Contents

Section 1: Purpose .....	2
Section 2: Values.....	2
Section 3: Principles .....	2
Section 4: Structure of Panels, Committees, and Administrative Support involved in the Registration System .....	3
Section 5: Key Documents .....	3
References.....	4
Appendix 1: Recommendations from <i>A Review of Literature and International Practice on National and Voluntary Registers for Sign Language Interpreters</i> .....	5

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## Section 1: Purpose

- 1.1 The Regulatory Centre for Irish Sign Language Interpreters Ireland CLG has been established for the purpose of maintaining the register of Irish Sign Language Interpreters and quality assurance scheme ("the Register"), currently being developed by the Sign Language Interpreting Service. This company will operate under the business name of RISLI. A Registration Panel will be appointed to RISLI, which will assume the role of decision maker in relation to all relevant matters connected with the Register. It is intended that SLIS will provide administrative support to RISLI. It is envisaged that RISLI may pass Bye-Laws to provide for the making of rules, procedures and guidelines by RISLI.
- 1.2 The following are the purposes of RISLI:
- a) To protect users of interpreting services, primarily the Deaf community and service providers, through a standards-based registration system for Irish Sign Language Interpreters
  - b) To set and ensure adherence to standards for the provision of Irish Sign Language by public bodies
  - c) To support public bodies to facilitate the use of Irish Sign Language services so the deaf community can exercise their rights and entitlements through access to services
  - d) To support professional Irish Sign Language interpreters to meet and maintain standards
  - e) To promote social inclusion of Irish Sign Language users including access to public bodies

## Section 2: Values

- 2.1 The following are the values sought to be advanced by the development of the Register:
- a) **Social inclusion** and **access** for Deaf sign language users
  - b) **Quality** within sign language interpreting
  - c) **Availability** of sign language interpreting in Ireland
  - d) **Support for service providers**, particularly public services, in facilitating use of sign language interpreting services
  - e) Strive to **do no harm**

## Section 3: Principles

- 3.1 The registration system will uphold best practice, and set principles drawing on national and international evidence based standards for Sign Language Interpreting

Principles:

- a) **Balanced:** actions will be appropriate to the risks posed and costs identified
- b) **Accountable:** operations are based on rational and sound decisions
- c) **Fair:** rules and standards will be implemented fairly
- d) **Focused:** regulation will focus on the problem, and minimise side effects
- e) **Agile:** must be able to look forward and adapt to and anticipate change
- f) **Transparent:** regulations and processes will be open and user friendly
- g) **Embedded:** account will be taken of the Irish context, the Irish Deaf community, and other stakeholders

## Section 4: Structure of Panels, Committees, and Administrative Support involved in the Registration System

4.1 It is intended that Bye-Laws to be made by RISLI will provide for some or all of the following:

- a) A **Registration Panel** of up to 11 individuals, who serve in a voluntary capacity will maintain the Register. They apply to become panellists via Expressions of Interest, are shortlisted and recommended by the Selection Committee (in the case of the first Registration Panel), and are appointed by the Minister for Social Protection or designated representative. It is intended the Panel will include individuals from different stakeholder groups. The Chairperson of the Registration Panel will also be appointed by the Minister or designated representative.
- b) A **Selection Committee** will be set up to form the first Registration Panel. This will comprise five individuals, who will serve in a voluntary capacity. The members will be nominated by and/or include the Citizens Information Board (CIB), a SLIS Board member, the Irish Deaf Society, the Council of Irish Sign language Interpreters (CISLI) and an external representative with experience of an established professional register. The Selection Committee will be responsible for receiving Expressions of Interest for membership of the first Registration Panel, and recommending candidates to the Minister for Social Protection for appointment. The Chairperson of the Selection Committee will be appointed within the group.
- c) A **Complaints Subcommittee** (of three people) will be convened from the membership of the Registration Panel as required. The Chairperson of the Registration Panel will nominate the Subcommittee Chair. Where there are not sufficient members available, or conflicts of interest may arise, external nominees can be appointed. The Complaints Subcommittee role is to investigate complaints as set out in the **Complaints Procedure**.
- d) An **Appeals Panel (of three people)** to include a nominated appeals chairperson from panel membership. The Appeals Panel role is to hear appeals in a number of cases, including against decisions of the Complaints Subcommittee in cases of complaints relating to alleged breaches of the code of conduct or in respect of decisions in respect of a person's registration.
- e) **External Assessors** will be retained by the Registration Panel to set out practical and knowledge-based assessments of interpreters for Specialisation Panels and others, to assess qualifications, and to carry out annual audits of Continuing Professional Development among registered interpreters.
- f) Administrative support to the Register and its associated components will be provided by the Secretariat.

## Section 5: Key Documents

5.1 The operations of the various components of the Registration System will be based on some or all of the following documents:

1. Register Structure and Governance
2. Registration Panel – Membership and Operation
3. Registration Panel – Code of Conduct
4. Registration Process
5. Code of Conduct
6. Garda Vetting – Policy and Guidelines
7. GDPR and Privacy Policy
8. CPD and Mentoring Policy
9. Complaints Committee – Membership and Operations
10. Appeals Committee – Membership and Operations
11. Complaints and Mediation Processes paper
12. Appeals Processes
13. Panel of Assessors
14. Specialisation Panels - Operations
15. Skills Checks - Operations

5.2 The contents of the governing documents in Section 5.1 above can be amended, or new documents added, from time to time.

## References

- CORU Health and Social Care Professionals Council. *Guide for Council and Registration Board Members*, 2019. <https://www.coru.ie/files-council/guide-for-council-and-registration-board-members.pdf>.
- Sign Language Interpreting Service. *SLIS Consultation Paper: Development of a National Voluntary Register of Sign Language Interpreters*. Dublin, January 24, 2018. <http://slis.ie/consultation-paper-on-development-of-a-register-of-sign-language-interpreters/>.

## Appendix 1: Recommendations from *A Review of Literature and International Practice on National and Voluntary Registers for Sign Language Interpreters*

Recommendations from *A Review of Literature and International Practice on National and Voluntary Registers for Sign Language Interpreters*, (Trinity College Dublin, SLIS, March 2017)<sup>1</sup>.

1. Establish a voluntary register of interpreters, which will allow for automatic registration of candidates who hold a recognized ISL/English interpreting qualification from an accredited body whose training meets the required competency thresholds for practice. We suggest that the European Forum of Sign Language Interpreters (2013a) Learning Outcomes be adopted in this regard. Other documents that should be referenced include the UK's CILT Occupational Standards (2011), the Common European Framework of Reference for Languages (2001) and Sign Languages and the Common European Framework of Reference for Languages (Leeson et al. 2016)<sup>2</sup>. Following from international best practice, we propose that a degree-level qualification or equivalent be the minimum standard required for any new entrants to the register.
2. Grand-father in individuals who are currently on the SLIS list of recognized interpreters and those who hold a Diploma level qualification (Level 7) in Irish Sign Language/English interpreting. We suggest that there should be a cut-off point applied for registering on this basis, e.g. candidates with these credentials must register within 24 months of the voluntary register being established. Candidates registered in this manner should be obligated to complete CPD and meet other criteria for continued membership of the register as candidates admitted via a recognized IEP.
3. Facilitate the training and criterion-referenced testing of Deaf interpreters and Deafblind interpreters who wish to work between two sign languages for candidates who have not had access to an accredited IEP. (We suggest that the NAATI descriptor of what constitutes a DI be adopted). We advise that testing be driven by international best practice (e.g. see Angelelli and Jacobson, eds. 2009, Hale 2012). Candidates registered in this manner should be obligated to complete CPD and meet other criteria for continued membership of the register as candidates admitted via a recognized IEP. It is recommended that a review of the requirements for registration in this category take place after 5 years to evaluate whether a move towards a requirement for completion of an IEP will be feasible.
4. We advise that the voluntary register be administered by SLIS, but that the decision-making relating to the entry criteria for registration and process review rest with an impartial Registration Assessment and Evaluation Board, following moves that have seen separation of registration evaluation processes from the body that holds the register in other jurisdictions (e.g. USA, UK). This entity should comprise representation from key stakeholders: Deaf community, CISLI, interpreter educators, agencies, along with, we suggest, an independent party, perhaps derived from a practice profession that has an established register, be that voluntary or statutory in nature. We also advise that independent experts be drafted in as required.
5. We recommend that Continuing Professional Development be mandated. We advise that a CPD cycle of 3 years be considered, with maternity/paternity leave built into a cycle as required. All certified interpreters should be obligated to complete CPD. We suggest that interpreters be required to complete and document a minimum of 30 hours of CPD over a three-year period. We also strongly recommend that guidelines be drawn up regarding the kinds of CPD that will be validated. We suggest that protocols established be reviewed regularly.
6. We recommend that in addition to a CPD requirement, that registered interpreters be required to provide evidence of work practice as an interpreter. We would suggest that the requirement be in the region of demonstrating an average of 12 assignments or 12 hours per year over a three-year period (36 assignments or

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<sup>1</sup> [http://www.citizensinformationboard.ie/downloads/social\\_policy/SLIS\\_TCD\\_Review\\_of\\_National\\_Registers\\_of\\_Sign\\_Language\\_Interpreters\\_March\\_2017.pdf](http://www.citizensinformationboard.ie/downloads/social_policy/SLIS_TCD_Review_of_National_Registers_of_Sign_Language_Interpreters_March_2017.pdf)  
[http://www.citizensinformationboard.ie/downloads/social\\_policy/SLIS\\_TCD\\_Review\\_of\\_National\\_Registers\\_of\\_Sign\\_Language\\_Interpreters\\_March\\_2017.docx](http://www.citizensinformationboard.ie/downloads/social_policy/SLIS_TCD_Review_of_National_Registers_of_Sign_Language_Interpreters_March_2017.docx)

<sup>2</sup> <http://www.ecml.at/ECML-Programme/Programme2012-2015/ProSign/tabid/1752/Default.aspx>

minimally, 36 hours in total) for interpreting accreditations. An assignment is any job ranging in time from less than one hour up to a day).

7. All candidates for registration should be required to be Garda vetted and provide evidence that they hold indemnity insurance. It is also recommended that candidates demonstrate that they are in good standing as member of a professional association of interpreters (e.g. CISLI, ITIA, ASLI, efsli, WASLI, AIIC, etc.).
8. We recommend that the independent Registration, Assessment and Evaluation Board ensures that processes are clearly articulated in the public domain (e.g. on a website) in both ISL and English.
9. It is recommended that a robust “Concerns and Complaints” process be established, with mediation processes implemented. Such mediation should be independent from the Registration, Assessment and Evaluation Board. We suggest that the NRCPD’s process is a good model for consideration.
10. We advise that the impact of registration be documented quantitatively and qualitatively, and analysed, with anonymized data published. This will facilitate the benchmarking of impact from an empirical standpoint, something that we have seen is sorely missing internationally (UKCES 2011).
11. We note that SLIS is a member of the ISL Recognition Group and is well placed to engage in discussion with key policy makers regarding any reference to (and potential increased regulation of) sign language interpreting as part of moves towards legislating for ISL.