SLIS National Forum: Response Paper

The **SLIS National Forum** took place on Saturday 12 June in Cabragh Hall, Deaf Village Ireland, with 47 attendees. The purpose of the Forum, organised by SLIS with the assistance of **Republic of Experience** event management,[1] was to present, discuss and gain feedback on three pivotal documents in the move towards a new National Register of Irish Sign Language Interpreters. These documents were

Draft *Registration Scheme Process*;

Draft *Complaints and Mediation Process*;

Draft *Code of Conduct*.[2]

The morning session consisted of an introduction by SLIS Chairperson, Anne Coogan, followed by presentations by SLIS Quality Development Officers Margaret O'Connor and Cormac Leonard[3] on the details of the new Register and associated documents. Teresa Lynch, a Deaf interpreter and interpreter trainer, and Suzanne Carey, a Munster-based interpreter, presented briefly on what the new Register would mean for Deaf service users, and practitioners, respectively. Following this Benny Elferink, Director of the Dutch Register for Sign Language and Speech-to-Text interpreters Foundation (RTGS), gave an overview of the system used in the Netherlands to register sign language interpreters. Following these presentations, Angela Black, CEO of the Citizens Information Board, chaired a short Q&A session and invited feedback from the attendees.[4] After lunch, the attendees broke into three breakout discussion groups. Each group was facilitated by a facilitator from Republic of Experience, and a note taker was present to record the broad points of feedback arising from discussion.[5] Another Q&A session occurred after these breakout sessions, chaired by John Stewart.

The following issues and themes have been compiled from notes taken during facilitated discussion groups, from the comments, questions and concerns expressed at both the breakout sessions and the Q&A sessions before and after lunch.

Observations are followed by a preliminary response(s) from the SLIS Quality Development Officer.

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[1] See www.republicofexperience.com
[2] For copies of the documents please visit http://slis.ie/national-forum-consultation-papers/
[3] Cormac Leonard has temporary replaced Margaret O'Connor as QDO following Margaret O'Connor's maternity leave from 15 June 2019.
[4] See Appendix 1 for a full programme of the day.
[5] See Appendix 2 for a list of the questions utilised by the facilitators. As only two Irish Sign Language / English interpreters were able to be sourced for the Forum, one of the three groups could not be provided with an interpreter; therefore this group consisted only of hearing attendees (mostly interpreters).

Assessment and Quality: *Points raised by attendees*

- A major theme that arose was that of **assessment**. It was broadly felt that assessment needed to be elaborated upon, and more emphasis on evaluation of quality in the registration process.

- The old Irish Sign Link / SLIS Accreditation processes were mentioned in this regard as being **a clear two-tier (R1 / R2) structure to assist Deaf people in knowing the skill level** of interpreters.

- In particular, there was an expressed **need for assessment for medical / legal domains.**

- It was also pointed out that **when assessing the ISL competencies of interpreters, a native ISL user should be used.**

- Linked to this was a recognition of that **some experienced interpreters hold accreditation or qualifications from a number of years ago.** These interpreters have not been retested to assess if they have developed or maintained their skills.

Response: The capacity of the Register as envisaged to assess candidates has been recognised from the outset of this process. See the suggested name of the proposed body in the *Review of Literature and International Practice on National and Voluntary Registers for Sign Language Interpreters* by Lorraine Leeson and Lucia Venturi, upon which SLIS has based its draft Register process: "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)."[6]

It should also be pointed out that **the three draft documents as presented already clearly mention assessment** in several places, viz.:

Draft *Registration Scheme Process* paper, section 2.1, Governance: "The register will be governed by the Registration Panel. The Registration Panel is responsible for... Setting criteria for the selection and operation of **individual assessments, when required**."[7]

Draft *Registration Scheme Process* paper, section 3.2, *Applications for Registration (General)*:

- (a) *Applications with recognised qualifications who apply for late registration*. "**The Panel may decide to request the applicant to ... [s]uccessfully complete an assessment in advance of obtaining registration**."[8]

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[6] Leeson, Lorraine & Venturi, Lucia (2017), *A Review of Literature and International Practice on National and Voluntary Registers for Sign Language Interpreters,* p. 90.
[7] SLIS, *draft Registration Scheme Process paper*, p. 4.
[8] SLIS, *draft Registration Scheme Process paper*, p. 5.

- (b) *Candidates who do not hold one of the six recognised qualifications / accreditation*: **"The Panel may decide to request the applicant to ... [s]uccessfully complete an assessment in advance of obtaining registration."**

- (c) *Candidates returning to the Register*: **"The Panel may decide to request the applicant to ... [s]uccessfully complete an assessment in advance of obtaining registration."**

Draft ***Registration Scheme Process*** paper, section 3.4, *Deaf Interpreters – Alternative Route to Registration:* **"The Registration Panel may request the applicant to ... [s]uccessfully complete criterion referenced assessment."**[9]

Draft ***Registration Scheme Process*** paper, section 5.1, *Requirements to maintain registration:* **"The registered interpreter must... [s]uccessfully complete any assessment required by the Registration Panel."**[10]

Complaints about quality of interpretation, if upheld, can (among other outcomes) lead to an assessment of the interpreter by the Registration Panel. See draft ***Complaints and Mediation Process*** Section 7.6(b), 'The Committee makes a decision on the complaint': "[If the] complaint is upheld… The committee will report to the Registration Panel and may make a recommendation to the Registration Panel in relation to sanction(s) to be imposed on the interpreter including… **Requiring the interpreter to complete specific training/supervision/assessment** or attaching conditions to the person's registration."

It is intended that **unsatisfactory performance in these assessments would lead to conditions** being added to a candidate's registration, such as a request for compulsory CPD to be carried out, mentoring, or a further assessment. Ultimately, **failure to follow conditions could lead to removal from the Register.**

It has been proposed that within the Registration Scheme Process paper, a member of the Irish Register of Sign Language Interpreters is defined as **"a professional interpreter who, through production of evidence pertaining to their route of qualification, has demonstrated an entry standard set of competencies in interpreting between Irish Sign Language and English (or within Irish Sign Language). Membership of the Register in itself does not indicate competency in higher-risk areas of specialisation, such as legal or medical interpreting."**

It has also been proposed that within the Registration Scheme Process paper, the Register **"will establish and maintain Specialisation Panels of interpreters for particular domains of interpreting that take place within particularly complex linguistic or educational settings, require specialised knowledge, skills and competencies, and/or in which there are particular and significant risks to health, liberty, or life outcomes of individuals requiring interpretation services."**

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[9] SLIS, *draft Registration Scheme Process paper*, p. 6-7.
[10] SLIS, *draft Registration Scheme Process paper*, p. 9.

It is envisaged that **training and assessment** of interpreters working in **specialisations will be dealt with as a priority**. SLIS are exploring **tendering out for accredited CPD modules to be developed in the topics of legal and medical interpreting,** as well as Deaf interpreting, and upgrade interpreting language competencies to levels C1 or above on the Common European Framework of Reference for Languages (CEFR). This was specifically recommended in *A Framework for Continuing Professional Development for Sign Language Interpreters in Ireland*, a report by Elizabeth McSkeane, commissioned by SLIS and to be published in 2019.[11] Like any accredited training, these modules will contain assessment components that will require a pass for completion. It is intended that successful completion of these modules will be used as a route for membership of the **Specialisation Panels** of the Register.

Part of another, criteria-based route to membership of Specialisation panels, would be to carry out **assessments (or 'Skills Checks')** for membership, particularly for candidates whose qualifications or accreditations were obtained many years ago. Any assessment carried out by the Register may result in conditions being attached, **such as Continuing Professional Development,** to their membership of the Specialisation Panels.

Given the depth of feeling on this area at the Forum, **SLIS are developing elaborations on the elements of assessment already present** in the draft documents. Draft papers for feedback entitled *Specialisation Panels – Procedures* and *Skills Checks – Procedures*, around structures of assessment that could be used, are in development.

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[11] Elizabeth McSkeane (2019), *A Framework For Continuing Professional Development for Sign Language Interpreters in Ireland*, p. 47. This report is to be published later this year.

New Interpreters and Mentoring: *Points raised by attendees*

- Concerns were expressed about **the work of new CDS graduates working into English.** Deaf people were unsure about the skill level of new graduates and there were issues around trust. It was felt that often the graduate doesn't reflect the style or intonation of the deaf person, and it doesn't match - hence the message is not delivered correctly. Some attendees questioned whether there was sufficient trust in the ISL / English Interpreting Degree programme in Trinity College Dublin.

- It appeared to some that after four years in college, **CDS graduates were then placed straight into work, and left to their own devices with no real support in place.**

- Many comments mentioned **the importance of a mentoring programme** for newly graduated (and other) interpreters as part of the process, e.g. a newer interpreter in a medical setting is paired with a more experienced mentor. This is particularly important for new graduates who have no support at the moment after they qualify. Maybe mentoring could be incorporated into the CPD requirements or a portfolio of experience could also be used.

- Some mentioned **the change over time in the profile of intake of students in CDS.** They felt that When the CDS two-year Diploma course was available there seemed to be more motivation among students; the interview process to enter the Diploma probably led to more research by students into the Deaf community and all it entailed. Now, through the CAO system, the Degree course is open to those just finished their Leaving Certificate - these young people possibly have no background or contact with the Deaf community or ISL whatsoever, but just an interest in sign language.

- Given that a lot of Deaf people are nervous around the skills of new graduates, **various limitations around practice were discussed once students graduated from CDS.** Should new graduates be allowed on the Register straight away? One suggestion was a 6 months period before they could register; another was that they shouldn't be allowed practice in medical or legal situations.

Response: The Register will accept new CDS Degree graduates as Members of the Register. However, it is important to note that **basic membership of the Register will not indicate competency to interpret in specialised settings such as legal or medical interpreting.** A point will be added into the draft Registration Scheme Process paper to indicate this (see p. 3). It is intended that **Specialisation Panels** of the Register will be established that will correspond to such high-risk or high-skills areas.

SLIS intends to establish a Mentorship system, and are exploring the possibility of **ensuring new registrants, graduated less than 12 months prior to registration, have access to a Mentorship structure.** Mentors would function to provide support to new interpreters, while also attempting to work through issues of quality and skills. A Proposal to this end is being prepared by the QDO, which if agreed and funded, would see a group of Mentors

being trained and potentially ready to work with new interpreters from June 2020. A cohort of 5-8 newer interpreters qualifying at this time, and becoming eligible for registration, presents an opportunity to pilot a scheme of structured Mentorship. If successful, and after review, this scheme could be extended and expanded in provide other interpreters with an opportunity to be mentored, potentially in specialised fields of interpreting such as medical or legal interpreting. There is potential further down the line to employ a mentor(s) to deal with the growing demand for this support.

It may be possible for the Panel to register newer interpreters with conditions or recommendations that they work with another interpreter for a period of time, rather than alone.

If there are serious concerns regarding the work from ISL into English against any interpreter, regardless of experience, it should be pointed out again that **complaints about sub-standard interpretation can, if upheld, lead to an assessment of the interpreter by the Registration Panel.** See draft *Complaints and Mediation Process* Section 7.6(b), 'The Committee makes a decision on the complaint': "[If the] complaint is upheld… The committee will report to the Registration Panel and may make a recommendation to the Registration Panel in relation to sanction(s) to be imposed on the interpreter including... **[r]equiring the interpreter to complete specific training/supervision/assessment** or attaching conditions to the person's registration."

Complaints can be initiated by a Deaf service user or another interpreter; see draft ***Complaints and Mediation Process,*** Section 2: *Who can make a complaint?*: "Any person can make a complaint against an interpreter if they feel the interpreter has not abided by the Code of Conduct. That includes service users, other interpreters, the Registration Panel or others." See draft ***Code of Conduct*** Section 3.2 'Poor professional performance': **"Poor professional performance is any failure of an interpreter to meet the standards of competence that may reasonably be expected of interpreters."**

Deaf Interpreters: *Points raised by attendees*

- Strong concerns were expressed about the current **lack of qualifications or career pathway for Deaf interpreters** and the future of this field.

- Questions were asked about the **actual definition of the term** 'Deaf Interpreter'.

- There is an **inequality in the availability and status of training for hearing and Deaf Interpreters.** Some felt that the emphasis on CPD is all well and good, but Ireland has no specific training for Deaf Interpreters, other than workshops which are too informal and are insufficient to get on the Register.

- Given the commitments and difficulties facing prospective Deaf interpreters, there should be **different expectations of Deaf Interpreters (DIs) and hearing interpreters in relation to practice hours** required to remain on the register.

- There was a need for hearing interpreters to know when to introduce a Deaf interpreter into a situation.
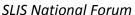
Response: **A definition of 'Deaf Interpreter'** is given in the draft **Registration Scheme Process** paper, Section 1.5, Definitions: **"Deaf Interpreters are Deaf or Hard- of of-hearing people who possess fluency in ISL and have recognised skills in the interpretation/ translation of meaning between languages and cultures. Deaf interpreters often work in tandem with another interpreter. They provide supports that bridge a cultural or linguistic barrier that has been recognised within the community particularly in working with Deaf foreign nationals who are not fluent in ISL, Deaf Blind or individuals with additional needs or minimal language. It is their in-depth knowledge of Deaf culture and the Deaf community that provide supports and skills to a hearing ISL interpreter. Deaf interpreters often have a fluency in other signed languages."** Discussion can be held with the Deaf Interpreter Working Group to further enhance and clarify this definition, and itemise the various types of settings that Deaf interpreters work within.

                Degree-level training for Deaf Interpreters is available in Ireland. The Centre for Deaf Studies Programme is open to accepting Deaf people onto its Irish Sign Language / English Interpreting degree, but to date no Deaf people have applied for this.[12] SLIS can work together with CDS, CISLI and IDS to promote this route.

                Internationally, the standard of training for hearing and Deaf interpreters is recommended to be identical. In the 2018 Erasmus+ Report entitled *Developing Deaf Interpreting in Europe,* it is stated that "The interpreting profession is an expert profession and thus the

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[12] "Note: we also welcome Deaf candidates to consider this route – all English language content is available in subtitled format and one of our lecturers is a Deaf Interpreter." Centre for Deaf Studies, Trinity College Dublin website, 'What is Sign Language Interpreting?' https://www.tcd.ie/slscs/undergraduate/deaf-studies-bachelor/ ; "In Ireland, [as of 2016] the sign language interpreter training is open to deaf individuals, but no deaf students have applied." Lindsay Mette Sommer (2016), *Deaf Interpreters in Europe: a comprehensive European survey of the situation of Deaf Interpreters today*, p. 17.

level of education, as well as the levels of teaching and learning, should be appropriate... Our basic premise is that **the education of Deaf interpreters should be on the same level and last as long as the education of hearing interpreters within the same country**."[13]

In the medium to long term, therefore, the pathway for Deaf interpreters should be the Degree programme in CDS. However SLIS also recognise that issues exist for potential Deaf interpreters whose age, employment status, family status etc. may militate against their ability to follow a full time four-year Degree programme. Also, given the need for Deaf interpreters in Ireland - particularly for Deaf people from outside Ireland in the healthcare and justice systems – there is recognition of the need for a more short term solution. To this end**, SLIS is preparing to put out to tender for an accredited training module(s) for Deaf interpreters,** offering potential Deaf interpreters a route to gain recognition of their skills in a way that has appropriate status and will be mapped to entry into the Register.

Any difficulties that Deaf (or indeed hearing) interpreters have in terms of accessing and attending CPD opportunities can be explained to the panel, and dealt with on a case by case basis. Please see **Registration Scheme Process, Section 9.4, '**Exemptions for work practiced': "We are conscious that registered interpreters work in different circumstances and some may not have the same practice work opportunities as others. Registered interpreters may apply to have their requirements reduced or suspended for one calendar year."

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[13] Halkosaari, Liisa & Mäkelä, Outi (2017), *Developing Deaf Interpreting in Europe, Erasmus+ 2018. Recommendations for a Curriculum for Deaf Interpreters - Curriculum Guide,* p. 4. https://www.deaf-interpreters.com/output3

Continuous Professional Development (CPD): *Points raised by attendees*

- **12 hours of CPD seems insufficient**; 20+ hours is more suitable as a first step, with plans to increase in the future after review.

- **More training needs to be provided** to interpreters, in order for them to fulfil CPD requirements.

- It is important to have some kind of **CPD guidelines or template documents**, or an end-of-year **portfolio**, that goes towards that shows the Panel what CPD you've done

- Include a **personal learning plan** where you set out what you want to achieve in advance this year.

- CPD should be included which has an assessment component.

- It should be **mandatory to have some involvement at Deaf events** as part of CPD.

- Particular elements were mentioned that should be included in CPD, including **ISL skills and working from ISL into English ('voiceover').** Concerns were raised about the quality and accuracy of work of interpreters from ISL into English. Deaf people should also have access to voiceover more often – for example, a written transcript of it - to see how they are being represented. Training on how to interpret character and 'affect' should be included.

- A questions arose as to whether **'shadowing' other interpreters** could be **considered for CPD.**

- Agencies also need to take on responsibility for providing training.

- The **changing demographics in the Deaf community** were mentioned, and how this affects ISL and therefore the skill sets required to effectively interpret.

Response: In relation to hours of CPD that registered interpreters must do, SLIS commissioned research completed by Dr Elizabeth McSkeane in relation to a framework for CPD to be followed. The Report mentions that this figure should eventually be 24 hours per annum, after a three-year rolling out period.[14] **SLIS is currently discussing this issue further with the Working Group on the Register, and a**re considering raising this to 18 or 24 hours.

The requirements may possibly also include set hours of involvement within Deaf community activities. A section may be added to the draft *Registration Scheme Process* paper specifying **a number of hours of unstructured CPD** which **need to be completed, consisting of activities within the Deaf community.** When these figures are finalised, they will be published in the draft Registration Process Scheme papers.

The Register will undertake to provide a programme of structured CPD, but also strive to signpost where other relevant professional CPD is available, in both structured and unstructured formats, to enable registrants to complete the allotted amount of hours or credit points.

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[14] McSkeane, Elizabeth (2019), *A Framework for Continuing Professional Development for Sign Language Interpreters in Ireland*, 4.2.2 Recommendations, 'Sign Language Interpreters', 1. 'General Requirements': "To maintain Registration, Sign Language Interpreters must engage in the credit points equivalent of 24 hours' CPD annually". (p. 44-5)

An appropriate portfolio system with guidelines, guides to credit points awarded for different kinds of CPD, templates and documentation will be developed and put in place for registrants. Please see draft *Registration Scheme Process* **paper**, Section 8.5 'CPD Portfolios': "Registrants will be provided with a CPD Portfolio Template which can be used to record completed CPD. CPD Portfolios should include:

- **Personal Learning Plan**: Identify the learning and development needs you plan to address during the CPD cycle and state your desired learning outcome.

- What you did: Provide the name and a brief description of your CPD activity. Note whether the CPD activity was structured or unstructured.

- When you did it: Dates, times and duration spent on the CPD activity.

- Reflection: Provide information on what you learned from the CPD activity and how it contributed to your professional development."

It is expected that other agencies, and bodies like the CDS, Bridge, CISLI, ITIA, and others will continue to organise and hold CPD events. This point is made by Dr Elizabeth McSkeane in her Report, where she recommends that "[m]ultiple providers of CPD for Sign Language Interpreters will be needed, to provide an extensive range of learning opportunities and activities that will meet the needs of the Sign Language Interpreters and the Register. Providers could include: SLIS, academic institutions, professional organisations, advocacy groups and others."[15] Such CPD events can be mapped onto the Register's CPD credit points system depending on the type of CPD it is, and therefore can be used to satisfy the CPD requirements each year.

Whether CPD provided by external bodies has an assessment component is out of our hands, but **SLIS has plans to develop accredited training modules in specific areas** – namely Deaf interpreting, legal/medical interpreting, and enhancing language skills to CEFR[16] level C1/C2[17] – which will contain assessment as a core part of the modules.[18] **Working into ISL, and working into English ('voiceover') at an advanced level** would form part of the latter piece.

Shadowing could be considered **as 'unstructured' CPD** – or incorporated into a Mentorship Agreement.

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[15] McSkeane, Elizabeth (2019), *A Framework for Continuing Professional Development for Sign Language Interpreters in Ireland*, General Conclusion no. 7, p. 31.

[16] Common European Framework of Reference for Languages. See https://www.coe.int/en/web/common-european-framework-reference-languages/level-descriptions.

[17] C2: "Can understand with ease virtually everything heard or read. Can summarise information from different spoken and written sources, reconstructing arguments and accounts in a coherent presentation. Can express him/herself spontaneously, very fluently and precisely, differentiating finer shades of meaning even in more complex situations." C1: "Can understand a wide range of demanding, longer texts, and recognise implicit meaning. Can express him/herself fluently and spontaneously without much obvious searching for expressions. Can use language flexibly and effectively for social, academic and professional purposes. Can produce clear, well-structured, detailed text on complex subjects, showing controlled use of organisational patterns, connectors and cohesive devices." See https://www.coe.int/en/web/common-european-framework-reference-languages/table-1-cefr-3.3-common-reference-levels-global-scale

[18] Ibid. Recommendation 15: "Development of CPD modules aimed at Deaf Interpreters - Features named in the TOR should include (a) credit for prior learning and (b) accreditation of both theory and skills required by Deaf Interpreters; Development of Higher Education CPD modules for qualified and experienced Sign Language Interpreters, to include: single post-graduate language modules at NFQ Level 8 pitched at levels C1 and C2 on the Common European Reference Framework for Languages; and specialisations in high-risk situations, including Health and Legal settings." p. 34.

Complaints and Mediation Process: *Points raised by attendees*

- It was felt by many that **the time limit of 6 months after an incident to make a complaint was too long.** This should be changed to 3 - 4 months except in *"exceptional circumstances".*

- It was also suggested that in the past, some issues have happened regarding interpreters, but Deaf people have only complained amongst themselves without taking it further. Many Deaf people do not have the confidence to officially complain. **The complaints procedure should be as simple as possible**, and should be tested with Deaf clients and amended according to their feedback. **The procedure needs to be made very visually accessible for Deaf people**, outlining how they go about it, step by step.

- A few attendees mentioned Deaf people's lack of confidence in entering a formal complaints process. The idea was broached of including a similar mechanism to the **NRCPD's 'Raise a Concern'** process,[19] or some other **informal mechanism for Deaf people to raise issues anonymously,** and not go through a formal process. Deaf people may feel comfortable with doing this about smaller issues that come up. A nice alternate to a full formal complaint. Interpreters might also have the opportunity to 'Raise a Concern', in order to make it fair.

- Some suggested other kinds of **feedback processes for Deaf clients** – perhaps an anonymous paper form, or online survey, would be more comfortable for a Deaf person to engage in, rather than face to face feedback.

- It was felt by some that **the Register should take complaints against unregistered interpreters.**

- **Mediation** as an option was largely seen as useful and welcome. There was a need to have trained mediators involved.

- **There was a query around the Appeals committee** around whether there would be an interpreter on the committee.

- The importance of **confidentiality** is extremely important in relation to the process.

- Other attendees felt that **the Complaints procedure should not be held by SLIS**.

- An **opportunity to review** the Complaints in the future would be very important.

Response: Upon reflection on this issue and thanks to the feedback received at the forum, it has been proposed to change the **draft *Complaints and Mediation Process*, Section 5**: *'When should I make a complaint?'*: "We only consider complaints about issues that occurred within the previous **three months** from when the complaint is submitted. In exceptional circumstances, the Complaints Committee may choose to extend the **three month** time limit."

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[19] See https://www.nrcpd.org.uk/raise-a-concern for more information.

A ISL translation of the *Complaints and Mediation Process* will be made available, along with **literature** to explain each section of it with appropriate visuals such as flow charts.

It may be possible to add something similar to NRCPD's 'Raise a Concern' process, referred to in the Forum. It could be entitled **'Informal Feedback', and will be a form of giving anonymous (if preferred) feedback to the Register about registered – and unregistered – interpreters.** Feedback about unregistered interpreters may also be potentially important, as it could be collated and used to further progress statutory registration of interpreters in the future, as NRCPD do themselves.[20] This will be discussed further within the Working Group.

In relation to mediation, please see draft **Complaints and Mediation Process**, Section 10.3: *The mediation process*, (a).: "The Complaints Committee appoints **a trained mediator**."

The exact makeup, composition, and administration around the Appeals Committee has yet to be finalised and will be the focus of another forthcoming paper, ***Appeals Committee Policy and Procedures.***

The strictest confidentiality and ethically sound processes will be put in place in all aspects of the *Complaints and Mediation Process* including the Appeals process.

Please also note the following sections of the **draft *Complaints and Mediation Process*:**

- Section 1, *'Introduction':* "All information received in the course of a complaints process is treated **strictly private and confidential**."

- Section 7.5: *'The complaint goes to the Committee':* The complaint goes to the Committee, (b).: "All correspondence and documentation issued while the complaint is being considered by the Committee should be treated as **strictly private and confidential.**"

- Section 10.3: *'The mediation process'*, (c).: "Everything that is said in the [mediation] meeting is **confidential**, unless otherwise agreed by all attendees."

- Section 10.3: *'The mediation process'*, (g).: "Sign [Mediation] agreement: Finally the mediator will write down what was agreed at the meeting and both the complainant and interpreter sign the agreement. **The agreement is to be kept confidential** unless the complainant and interpreter agree to make it public."

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[20] As per NRCPD: "A complaint can't be made about a communication and language professional who is not registered with NRCPD. That's because NRCPD is a voluntary regulator. That means communication and language professionals don't have to be registered with us. But because we think all communication and language professionals should be registered we do want to know about concerns with unregistered communication and language professionals. It will help us to explain why they should have to register by law." NRCPD, *When someone makes a complaint about you*, p. 5.
https://www.nrcpd.org.uk/documents/rtf/nrcpd_complaints_process_handbook_2015.09.rtf

Registration Panel: *Points raised by attendees*

- There were some questions around **who exactly would be on the panel**.

- It was felt that **selection criteria should be determined and published,** alongside details of who was on the panel.

Response: The **draft *Registration Scheme Process* paper, Section 2.1** 'Governance', states that *"Members of the Registration Panel are appointed by SLIS until 2021. The Registration Panel will act with autonomy and independence in the best interest of the register. Decisions in relation to the operation and development of the register will be made by the Registration Panel. SLIS will provide administrative and operational support to the Registration Panel in order to administer the registration and quality assurance scheme. SLIS will not be a member of the Registration Panel."*

A document that will be vital to this process, but has not been drawn up, is the ***Registration Panel Operation and Guidelines***. This will lay out the selection criteria for who is to be appointed by the SLIS Board to be members of the Registration Panel. This document will be made public when it has been drawn up and agreed.

Code of Conduct: *Points raised by attendees*

- Many comments centred on the **draft *Code of Conduct*, Section 4 b** (Confidentiality): *"We recognise that very occasionally interpreters may need to reveal such information when engaging with the Complaints & Mediation process or due to legal **or moral obligations**. For example, if someone at risk to themselves or others."* There was a feeling that this was vague or potentially problematic, and should be taken out. For times when confidentiality has to be broken, guidelines should be provided so interpreters know what steps they should follow.

- **Health and Safety** is not mentioned in the Code of Conduct but should be included in some way.

- There were a number of comments in relation to the **draft *Code of Conduct*, Section 5 & 6**: about **the importance of 'Impartiality'.** It was felt it was important that boundaries were adhered in this area. If interpreters leaned too much towards becoming an advocate, it put their impartiality in question.

- **draft *Code of Conduct*, Section 2.2** 'Poor Professional Performance': Adaptability is important here e.g. in rural areas there is huge variety, requiring an interpreter with experience of different signing styles or an interpreter with experience working with vulnerable people.

- SLIS should join up with CISLI and the IDS to make a code of conduct for the register. This would ensure a *"bottom- up"* approach as opposed to *"top-down"*.

Response: Following the feedback at the Forum that this section is at present too vague and open to conflicting interpretations, SLIS propose removing the phrase '…***or moral***'..

     We feel that the *Code of Conduct* contains strong provisions which ensure that an interpreter remains as impartial as possible while on assignment, while also allowing them to make decisions that best factor in the potential risk to impartiality their own beliefs, identity, biases etc. may present. Interpreters "must refrain from altering messages for political, religious, moral or philosophical reasons", and "must not unfairly discriminate against service users by allowing personal views affect the services they provide"; but equally "must refrain from taking on assignments where they feel they will not be able to put aside personal biases or reactions which may affect the impartiality of the interpretation."

     The draft ***Code of Conduct*, Section 7 a** (Working Conditions) states that *"To ensure the best quality interpretation, interpreters will: (a) Aim to ensure that **satisfactory working conditions / facilities are in place in order to support effective interpretation**. For example, sound, visibility, requirements for co interpreters/ Deaf interpreter, **rest breaks, comfort** etc. **Where working conditions / facilities are not satisfactory,** the interpreter must make it known to those involved and let them know how the working conditions / facilities will impede effective interpreting. In such cases interpreters may withdraw from the*

assignment." This clause, when taken alongside the health and safety policies and procedures in place among interpreter agencies, and especially **CISLI's *Occupational Health and Safety Policy*,** provides necessary guidance and support in this regard.

The potential overlaps or conflicts between the **Register's *Code of Conduct*** and the **CISLI Code of Ethics** are an area that requires exploration and discussion. SLIS will strive to discuss this issue with CISLI and IDS, and be in a position to feedback afterwards as to how the final Code of Conduct will best be placed.

Registration Scheme Paper – General: *Other points raised by attendees*

- Registered interpreters should be given tangible or visual indicators that they are registered, for example, a licence number or registration card of some kind.

Response: See draft ***Registration Scheme Process*** paper**, Section 4.2** 'Notification of Registration': "Successful applicants and applicants who are registered with conditions will be provided with a **Certificate of Registration** with a **unique registration number**."

A visual indicator can also be provided to members who successfully complete registration, i.e. a **Register Membership Card** featuring name, registration number, and details of registration status." This should be presented to service users upon request.

- There was a query asking if different registration levels to be placed in the Register could be tied into a fee structure that reflected the relative levels of skill and experience that an interpreter had.

Response: **The Registration Panel has no role or control over interpreter fees.** In relation to its referral service, SLIS does not decide on fees – this is a matter between the interpreter and the paying client. This should be pursued by other stakeholders, , as the likes of ASLI and NUBSLI have done in the United Kingdom.[21]

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[21] See National Union of British Sign Language Interpreters (NUBSLI), 'Freelance fees for interpreting engagements for BSL/English interpreters, 6 April 2019 – 5 April 2020'. https://nubsli.com/guidance/interpreter-fees/

Appendix 2: Programme for the National Forum

10am REGISTRATION

Tea & Coffee will be available at the HUB in Deaf Village Ireland

Attendees will be given the consultation papers at registration: Registration Scheme Process, Complaints & Mediation and the Code of Conduct

Registered attendees will be also sent the consultation papers by email in advance.

10.30 am OPENING

Chair of the morning session: Angela Black (CEO of Citizens Information Board)

Welcome: Anne Coogan (Chairperson of SLIS)

10.45am – 1pm MORNING SESSION

10.45am: **The Registration Process**: Margaret O'Connor (Quality Development Officer, SLIS)

11.15am: **Service user perspective on the register - Need, Value, Benefits & Limitations:** Teresa Lynch (Assistant Professor at the Centre for Deaf Studies, Chairperson of the National Deaf Women of Ireland, Deaf interpreter, Member of the Working Groups on Registration and Deaf Interpreting)

11.30am: **How the register will impact the interpreting profession:** Suzanne Carey (Irish Sign Language Interpreter, Member of Sign Language Interpreters Munster (SLIM) and Member of the Working Group on Registration).

11.45am: **Lessons learned from the Dutch Sign Language Register:** Benny Elferink (Director of the Dutch Register for Sign Language and Speech-to-Text interpreters Foundation (RTGS), Project Co-ordinator of the Dutch Centre of Sign Language and former Chairperson of the Dutch National Deaf Association).

12.15pm: **Questions & Answers**

12.40pm: **Wrap up:** Chair of the morning session, Angela Black, CEO of Citizens Information Board

12.45pm **LUNCH**

Available at the HUB.

2pm – 3.30pm: BREAKOUT CONSULTATION GROUPS

- Consultation Rooms: Rathmines Room, Cabragh Hall and the SLIS Board Room.
- Note takers and facilitators will be provided to each group.
- Consultation topics: Registration Scheme Process, Complaints & Mediation and the Code of Conduct

3.45pm – 4.30pm AFTERNOON SESSION

Chair for afternoon session: John Stewart, National Manager, SLIS

3.45pm: Facilitators sum up

4.15pm: Questions & Answers

4.25pm: Closing: Anne Coogan, Chairperson, SLIS

National Forum 8th June 2019

1. Registration Scheme Process

    a. Is the Registration Scheme Process fair, including for Deaf interpreters?

    b. Are the standards of entry and maintenance requirements at the right level for quality assurance? (Section 3: Entry Requirements)

    c. Is there anything that should be changed or added to the Registration Scheme Process?

2. Complaints & Mediation

    a. Is the Complaints & Mediation process fair to the complainant and the interpreter?

    b. Do you think the Mediation process is useful? (Section 10: Mediation)

    c. Is there anything that should be changed or added to the Complaints & Mediation process?

3. Code of Conduct

    a. Is there anything that should be changed or added to the Code of Conduct?