

National Register of Sign Language Interpreters

Complaints and Mediation Process

Sign Language Interpreting Service

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Section 1: Introduction

The National Register of Sign Language Interpreters is a quality assurance and registration scheme for Irish Sign Language and Deaf Interpreters in Ireland. Registered interpreters (“interpreters”) agree to abide by a *Code of Conduct*. You can make a complaint about an interpreter if you feel the interpreter has not abided by the *Code of Conduct*.

This paper sets out the process for handling complaints against interpreters.

All information received in the course of a complaints process is treated strictly private and confidential. For more information, please see our [Privacy Policy](#).

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. The complainant must provide us with their name, contact details and information about their complaint. Anonymous complaints will generally not be accepted. For more information on how to make a complaint, please see section 6.1 of this document.

Section 3: Who can I make a complaint about?

A complaint can only be made against an interpreter. A complaint cannot be made against someone who is not on the register.

Section 4: What can I make a complaint about?

You can make a complaint if you think an interpreter did not act according to the *Code of Conduct*. This might include:

- Poor performance
- not having the skills needed for the interpreting assignment
- breach of confidentiality
- not respecting someone’s right to make their own decisions
- being dishonest
- conduct or behaviour issues

Section 5: When should I make a complaint?

You should complain as soon as possible after the incident has occurred, as the passage of time may adversely affect the ability to investigate the complaint adequately. 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.

Section 6: How do I make a complaint?

6.1: How to make a complaint?

- a. **Complaint Form:** Fill out the Complaint Form (see appendix 1). You can email the Complaint Form to register@slis.ie or by post/in person to:

Register
Sign Language Interpreting Service (SLIS)
Deaf Village Ireland
Ratoath Road
Cabra
Dublin 7

- b. **Irish Sign Language (ISL):** You can submit a complaint in Irish Sign Language (ISL) by sending a video message. Alternatively you contact register@slis.ie or attend the SLIS office at the address above. We will organise a meeting with you on video-call or in person to fill out the Complaint Form.

6.2 What information will I need to give?

- a. Your name
- b. Your contact details
- c. The name of the interpreter you are making the complaint about
- d. What happened
- e. When and where did it happen
- f. Was there anybody else there
- g. Who organised the interpreter to be there

We recommend you also provide the following information:

- h. What parts of the Code of Conduct did the registered interpreter not follow?
- i. What is your desired outcome from the complaints process?

For more information, see the *Complaint Form* in appendix 1.

Section 7: What happens after I make a complaint?

7.1 Flow chart on the Complaints Process

Flow Chart

7.2: The Quality Development Officer checks the complaint

The Quality Development Officer will check that:

- a. The Complaint Form is completed in full. If some information is missing from the Complaint Form the Quality Development Officer will go back to the complainant requesting the required information.
- b. The complaint refers to an incident that occurred within the previous 6 months from when the complaint is submitted.
- c. The interpreter would be in breach of the Code of Conduct if the complaint was upheld.

If the complaint satisfies the conditions above (a, b, c) the Quality Development Officer will refer the complaint to the Complaints Committee. The interpreter will be informed of this and will be provided with a copy of the complaint received.

If the complaint does not satisfy the conditions above (a, b, c), the Quality Development Officer will let the complainant know that the complaint cannot be accepted and give the reasons why. The complainant will be informed that they have a right to appeal this decision to the Complaints Committee. If the complainant wishes to appeal the decision, the complaint will be referred to the Complaints Committee for consideration. The interpreter will be informed of the complaint received and the decision of the Quality Development Officer, and of the Complaints Committee in the event of an appeal.

7.3: The Complaints Committee (the “Committee”)

The Committee is a three person committee which will include a member with legal expertise. The Committee must be conscious of the range of expertise that may be required to during a complaints process, for example interpreting, knowledge of the Deaf community etc. The Committee may appoint external experts to look at the complaint. The Committee decides whether the complaint is proven; such that a finding is made that there has been a breach of the Code. The Committee reports to the Registration Panel and can make recommendations in respect of sanction to the Registration Panel. If any member of the Committee has a conflict of interest in relation to the complaint, they must step aside and not consider the complaint.

For more information see [*The Complaints Committee Policy and Procedures*](#).

7.4: What can the Complaints Committee not do with a complaint?

The Complaints Committee cannot:

- a. Look into complaints about anyone who is not a registered interpreter.
- b. Pay compensation or help make a claim for compensation.
- c. Make an interpreter apologise to a complainant.
- d. Give legal or professional advice or representation to the complainant or the interpreter.

7.5: The complaint goes to the Committee

The Committee will:

- a. **Decide whether to accept the complaint.** Reasons why a complaint may not be accepted include, but are not limited to:

- The Committee agrees with the decision of the Quality Development Officer not to accept the complaint and rejects the complainant's appeal of that decision.
- The complaint would not be a breach of the *Code of Conduct* if it was upheld.
- The complaint is not serious enough to warrant further action
- The complaint is frivolous, vexatious or made in bad faith.

If a decision is made not to accept the complaint, a copy of the complaint received will be provided to the interpreter together with confirmation of the decision of the Complaints Committee.

b. If the Committee decides to consider the complaint, the Committee will inform the interpreter mentioned in the complaint and provide the interpreter with an opportunity to provide a response to the complaint. The complainant may also be afforded an opportunity to comment on any response received from the interpreter. All correspondence and documentation issued while the complaint is being considered by the Committee should be treated as strictly private and confidential.

The Committee may seek expert legal or other advice in relation to the complaint. The Committee can appoint external experts to look into the complaint. The committee or expert may ask the complainant, interpreter or other people for more information. If an external expert is appointed, they will make recommendations to the Committee once the investigation is complete. The interpreter will be given an opportunity to comment on the report of the expert in advance of the Committee deciding whether the complaint is proven.

c. The committee may suggest mediation (see Section 10) to the complainant and interpreter. If both parties do not agree or do agree to mediation and subsequently withdraw from the process, or if mediation is not successful, the committee will resume its consideration of the complaint.

7.6: The Committee makes a decision on the complaint

Once the investigation is complete, the Committee will make a decision on the complaint and will prepare a report for the Registration Panel setting out whether the complaint is proven. The committee will let the complainant and interpreter know their decision by providing a copy of their report to them. The Committee could make either of the following recommendations:

a. The complaint is not upheld: Reasons why a complaint may not be upheld could include:

- The complaint is not proven.
- The passage of time will adversely affect the ability of the interpreter to defend themselves.
- The Committee is not satisfied that there is a serious breach of the *Code of Conduct*.

b. 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:

- Sending a formal written warning to the interpreter.
- Requiring the interpreter to complete specific training/supervision/assessment or attaching conditions to the person's registration.
- Suspending the interpreter for a specific period.

- Removing the interpreter from the Register for a specific period.

If the complainant or the interpreter does not agree with the decision of the Complaints Committee is upheld or not upheld, an appeal can be made to the Appeals Committee (see section 9).

The committee may also wish to make recommendations in relation to the Registration Panel in relation to the operation/policy of the Registration and Quality Assurance Scheme.

Section 8: Keeping people updated.

The length of the complaints process depends on the nature of the complaint. The complainant and interpreter will be updated at least every 3 months during the process.

Section 9: Appeals

If the complainant or the interpreter does not agree with the decision of the Complaints Committee, an appeal can be made to the Appeals Committee.

9.1 The Appeals Committee

The Appeals Committee is a three person committee, which includes a legal expert. No member of the Appeals Committee can be involved in the original decision by the Complaints Committee or any investigation into the complaint.

For more information see *The Appeals Committee Policy and Procedures*.

9.2 When should I make an appeal?

A notification of an intention to appeal must be made within 1 month of the complainant or interpreter receiving the decision on the complaint. A full appeal submission must be made within an additional 2 months, after the notification has been made.

9.3 How to make an appeal?

- a. Appeal Form:** Fill out the Appeal Form (see appendix 2). You can email the Appeal Form to register@slis.ie or by post/in person to:

Appeals
Sign Language Interpreting Service (SLIS)
Deaf Village Ireland
Ratoath Road
Cabra
Dublin 7

- c. Irish Sign Language (ISL):** You can submit an appeal in Irish Sign Language (ISL) by sending a video message. Alternatively you contact register@slis.ie or attend the SLIS office at the address above. We will organise a meeting with you on video-call or in person to fill out the Appeal Form.

A person may at any time withdraw the appeal in whole or in part by notifying the Appeals Committee.

9.4 What happens after I make an appeal?

- a. The Appeals Committee considers the appeal.**

- The appeals committee will be provided with all documentation considered previously together with the appeal form and all other correspondence. The appeals committee can appoint external experts to consider the matter.
- The appeals committee can request the person who made the appeal or any other people whose evidence is required, to attend before the Appeals Committee.

b. The Appeals Committee make a decision on the appeal.

The Appeals Committee may:

- Confirm the decision of the Committee subject to any amendments the Appeals Committee thinks appropriate.
- Annul the decision and make a new decision.
- Give other directions as it thinks appropriate.

For more information see [Appeals Policy and Process](#).

Section 10: Mediation

Mediation is one way of solving problems between two or more people through the use of a trained mediator. Mediation may be suitable in situations where complaint could relate to a misunderstanding or if the interpreter may not have meant to make the error. Mediation is a voluntary process. The complainant and interpreter must both agree to be involved in the mediation.

10.1: Flow Chart on the Mediation Process

Flow chart

10.2: When is mediation used?

If the Complaints Committee thinks the complaint is suitable for mediation, they will inform the complainant and interpreter, provide information on the mediation process and invite them to participate in the process. If either the complainant or the interpreter does not agree to mediation, the complaint will go back to the complaints committee for a consideration.

10.3: The mediation process

- The Complaints Committee appoints a trained mediator.** The mediator may request to meet the complainant and interpreter separately before the mediation meeting. The mediator can close the mediation process at any time if they believe the complaint will not be resolved through mediation. The complainant or interpreter can choose to withdraw from the mediation process at any time.
- Mediation Meeting:** A mediation meeting is organised with the complainant, the interpreter, a trained mediator and if required an agreed Irish Sign Language Interpreter to interpret the meeting. The National Register of Sign Language Interpreters will fund the cost of the trained mediator and agreed Irish Sign Language Interpreter for the mediation meeting.
- Sign Agreement to Mediate:** At the mediation meeting, the mediator will outline the process and the attendees sign an Agreement to Mediate to show they understand the process including:

- Agree to co-operate with the mediator.
 - Agree to take part in the process with the aim of reaching an agreement.
 - Understand that the complainant or interpreter can withdraw from the mediation process at any time. Also, the mediator can close the mediation process at any time if they believe the issues will not be resolved through mediation.
 - Everything that is said in the meeting is confidential, unless otherwise agreed by all attendees.
 - Any written documents used during the mediation process will be destroyed by the mediator after the mediation meeting. The Mediator will only keep the signed Agreement to Mediate, the Mediator's Contract and result of the mediation meeting which will either be the signed agreement or a note that no agreement was reached.
- d. Opening Statement:** At the beginning of the mediation meeting, the complainant and interpreter give an opening statement.
- e. Discussion of issues:** With the support of the mediator, the issues in the complaint are discussed in detail.
- f. Discussion on an agreement:** Next, there is a discussion on what should happen next. If possible the complainant and interpreter agree what will happen next. This may include the interpreter offering an apology, promising to do something different in future or other actions agreed at the meeting.
- g. Sign 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.
- h. If no agreement is reached,** if the parties withdraw or if the mediator closes the appeals process, the complaint will go back to the Complaints Committee for consideration.
- i. Reporting to the Complaints Committee:** The mediator will report to the Complaints Committee the result of the mediation, whether mediation was successful in resolving the complaint or not. Details of the mediation meeting or any agreement reached will not be given to the Complaints Committee. If mediation was successful, the complaint will be regarded as closed. If mediation was not successful, the complaint will go back to the Complaints Committee for consideration.

Section 11: References

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Appendix 1: Complaint Form

Appendix 1: Appeal Form