A Review of Literature and International Practice on National and Voluntary Registers for Sign Language Interpreters

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PROMOTING ACCESS AND STANDARDS IN SIGN LANGUAGE INTERPRETING

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Glossary of Terms

It is important to note that different countries utilise different terminology in reference to interpreter regulations. Regulation of professionals happens at varying levels, so before we turn to look more closely at the countries we selected for review, it is essential to distinguish the meaning of the following terms:

Accreditation: This is a term that is used to mean a number of things internationally:

(i) Accreditation is used to mean certification of an institution or course, recognizing that it has met standards set by external regulators (e.g. when an interpreter receives credentials from a national accrediting authority; these can include bodies that can award higher educational qualifications such as the Higher Education Authority in Ireland or a statutory or voluntary body which accredits courses (e.g. CORU); otr, in the case of students completing an accredited course in Australia or the UK being admitted to the national (voluntary) register of interpreters (NAATI, NRCPD).

(ii) In Australia, NAATI has previously used the term accreditation to refer to the status of individuals who are tested and deemed eligible to join the national (voluntary) register of translators and interpreters across four levels, Paraprofessional, Professional, Advanced and Advanced (Senior). [We note that they are now using the term 'certification'].

(iii) The UK Commission for Employment and Skills use the term 'accreditation' to refer to situations in which an individual may apply to be accredited as competent by a recognised professional body or industry association. In their usage, accreditation is distinct from certification in that the criteria governing accreditation and the procedures regarding enforcement are entirely the responsibility of the accrediting body rather than the state. An example in the UK is the accreditation scheme for accountants, who may apply to the Institute of Chartered Accountants in England and Wales for accreditation as a Chartered Accountant.

Certification: This refers to situations in which there are no restrictions on the right to practice in an occupation, but job holders may voluntarily apply to be certified as competent by a state appointed regulatory body. Workers in the UK who may apply for certification include fitness instructors (who may apply to be certified by the Register of Exercise Professionals) and hairdressers (who may apply to be certified by the Hairdressing Council) (UKCES 2011).

Continuous Professional Development (CPD): **See *Professional Development (PD)***

Continuing Education Units (CEUs): See *Professional Development (PD)*

Language of Lesser/Limited Diffusion: This is another term used in some countries (e.g. the USA) for a minority language. There are usually access needs associated with the community using the minority language.

LOTE: A language other than English

Licensing: licensure is implemented within a government jurisdiction such as at state, provincial level. The main purpose of licensure is to protect the public and ensure that practitioners hold minimum levels of qualification/have met particular minimum standards in order to practice. This is a term most frequently referenced in the USA where professional interpreters are regulated differently from State to State, with some States legally mandating that an interpreter must have a license to practice. However, Austria also has a legally mandated system in place and local authorities may only work with appropriately sanctioned interpreters (Grbic 2009). Workers who require such licences to practice in the UK include doctors, solicitors, veterinary nurses, private security guards, gas installers, taxi drivers and heavy goods vehicle drivers (UKCES 2011).

Occupational Regulation: This is a term used by the UKCES (2011) as a broad heading for various forms of standard setting mechanisms (accreditation, registration, accreditation, licensing). Occupations which are not regulated in any of these ways are termed unregulated.

Opting in: The process whereby Australian NAATI practitioners with accreditations awarded before 1 January 2007 can become part of the Revalidation system.

Practice Profession: Practice professions employ the knowledge and skills of that occupation in a dynamic, interpersonal context; that is, the profession engages regularly and directly in human service (Dean and Pollard 2004, 2005, 2013).

Professional Development (PD): Activities undertaken by the practitioner to maintain their knowledge and skills related to professional translating and interpreting. This includes self-development activities, tertiary courses and units, workshops and other activities offered by the industry.

Professional Development Logbook: Used for keeping records of activities and, in some countries, provided with revalidation application data as evidence the criteria for remaining on the register have been met (e.g. Australia, UK, USA, Canada). In some countries where a certification process does not exist, interpreting associations may also require evidence of CPD in order to maintain professional membership (e.g. New Zealand).

Protected Function: A protected function is a task, or series of tasks, which may only be carried out by an individual who is registered in the relevant profession by a statutory regulator. These tasks are sometimes also called 'controlled acts'.[1]

1 See: http://www.hcpc-uk.org/aboutregistration/protectedtitles/

Protected Title: A title or job description legally restricted to use by persons who have completed a specific training course and/or are members of a particular trade association[2].

Qualification: when an individual has successfully completed a recognised educational or vocational pathway, receiving certification for same. In an Irish setting, the qualification should be mapped to the National Framework of Qualifications (NFQ).

Recognition: A NAATI category awarded in translating and interpreting on the basis of documented work experience, introductory training and English proficiency, typically in a language of lesser/limited diffusion. This certification does not involve an objective assessment of an individual's translating and/or interpreting skill.

Registration: a system of assessment for interpreters who have not completed an accredited program to enable registration as an interpreter.

Regulation: we use the term 'regulation' to mean any kind of requirements that are put in place to police participation in the field of interpreting, for example, by establishing a minimum level qualification for entry to the field, via verification of skill-sets or competencies for practice, or by introducing requirements to be a member of a register, be that voluntary or statutory.

Work Practice (WP): Demonstrated and recorded practice as a translator or interpreter at a level appropriate to the type(s) of NAATI accreditation held.

2 See: http://www.hpc-uk.org/aboutregistration/protectedtitles/protectedfunction/

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Foreword

This report is particularly timely. The Irish government is considering legislation to recognise Irish Sign Language (ISL). The ISL Recognition Bill 2016 proposals will change provision of sign language interpreting in Ireland and currently includes a statutory register, to be held by SLIS. This is an immense opportunity to establish systems and processes for access and quality of interpreting. The Bill will underwrite equality for the Deaf community, particularly to public services, and should lead to enhanced health outcomes, better education levels and equal treatment before the courts for our Deaf citizens. Allied to this is the policy commitment in the National Disability Inclusion Strategy 2016-2018 that all public bodies provide free ISL interpretation to those availing of their statutory services. These developments will require a planned and comprehensive expansion of availability of sign language interpreting. SLIS is delighted to publish this report to inform dialogue and decisions at this crucial time.

Currently, Deaf ISL users do not experience the same levels of equality and social inclusion as other Irish citizens. They report difficulties in accessing their rights, entitlements, information and services, despite the fact that we know access to good quality sign language interpreting greatly facilitates equality for the Deaf community.

SLIS is the national sign language interpreting service for Ireland, funded and supported by the Citizens Information Board (CIB). SLIS provides a range of services including keeping a register, providing a remote interpreting service, a 24 hour emergency service to access interpreters and a social fund for hardship cases. The SLIS mission is to ensure Deaf people can participate as full and equal citizens by promoting, advocating and ensuring the availability of quality interpretation services to Deaf people in Ireland so they can access public and social services. To this end, SLIS commissioned an international literature and practice review of registers of sign language interpreters. This review was carried out in 2016 by Lorraine Leeson and her research team in the Centre for Deaf Studies, Trinity College Dublin.

The research report sought to answer key questions:

- What does literature identify as effective international policy or practice in developing registers of sign language interpreters?
- What are the features of national registers identified?
- How was policy developed, supported, resourced, implemented and monitored?

The research found the evidence base on policy in this area is scarce internationally and points to a lack of research and investment in knowledge development**.** As a result the research relied more heavily on a scan of practice and the work summarises the features of national registers in 11 countries, with 3 in-depth case studies.

Voluntary registers of Sign language interpreters are more common with statutory registers generally found where sign language has been recognised. For example, in Belgium and Finland, with populations similar to Ireland, Sign Language is legally recognised and there are *de facto* statutory registers of interpreters to underwrite quality. In both cases, the availability of interpreters is significantly better than in Ireland.

The report concluded that significant work is required to strengthen the regulation of Sign Language interpreters in Ireland. The report makes a total of 11 recommendations and

provides a skeleton outline of a more robust register. While a statutory register is seen as ideal, the development of a national voluntary register held by SLIS is recommended.

Profound thanks are due to the Centre of Deaf Studies, Professor Lorraine Leeson and Lucia Venturi, and everyone who contributed to producing this report. I believe it is a comprehensive work, incorporating the international literature and practice base, and provides an informed and thought provoking consideration of key issues at a critical time as Ireland seeks to improve the availability and quality sign language interpreting.

I would also like to thank the SLIS chairperson, Ann Coogan, and all the Board, SLIS staff and interpreters, our partners, including CIB, and Deaf users of SLIS services, for their support.

I finish with a wish, that all decision makers and stakeholders involved in dialogue on the inclusion of the Deaf community will produce a thorough response which expands provision of sign language interpreting to levels that effectively meet the needs of our Deaf citizens.

John Stewart
Manager, Sign Language Interpreting Services

Executive summary

This report presents the results of an extensive review of the literature on the regulation of the interpreting profession internationally. The project, commissioned by SLIS, focused on three issues:

1. What does literature identify as effective international policy or practice in developing registers of sign language interpreters?
2. What are the features of national registers identified?
3. How was policy developed, supported, resourced, implemented and monitored?

We addressed these issues via the following measures:

- We undertook a **literature review**: we collated and synthesized an overview of available international literature and practice in relation to national and voluntary registers of sign language interpreters, dating from 2000 onwards. The review examined empirical data emerging from studies (where they exist, though we note that most literature tends to be descriptive vis-à-vis processes in place rather than evaluative regarding outcomes) and cross-referenced findings against an analysis of the social context that exists in countries examined (Europe, North America, Austral-Asia).
- **We cross-referenced data from the literature review** with online data regarding registration processes and protocols with the goal of reviewing content made available to candidates regarding registration processes, and cross-reference this against findings from literature reviews.
- **We identified best-practice driven recommendations** for consideration vis-à-vis the occupational regulation of sign language interpreters in the Irish context.

This work allows us to describe the features of national registers identified, and, to the degree possible given time constraints and available published resources in languages accessible to the research team, to outline the policy developed in a given jurisdiction. However, what proved incredibly difficult to find was information that related to how policy had developed, been supported and resourced. More readily available was information regarding how policy had been implemented. Another area where a significant gap exists is information pertaining to the monitoring of registration processes as well as data documenting the impact of registration on both interpreters and key stakeholders. Despite this, we offer a snapshot of key tendencies relating to SLIS's three key questions here, before we drill down into the finer detail of approaches adopted internationally.

1. What prompts the establishment of a register of interpreters?

In some countries, the Deaf community drove the establishment of interpreter training (e.g. in the USA and Sweden in the 1960s – and indeed, in Ireland in the 1990s), whereby recruitment to the interpreting profession was led by community members (Cokely 2005). In other places, *de facto* registration was led by statutory bodies. For example, when the Scottish courts initially sought to establish the credentials of BSL/English interpreters, they accepted those vouched for by the Scottish Deaf community and added them to their list of acceptable court interpreters despite their lack of formal training (Scott-Gibson, Personal Communication, 2nd October 2016). In other countries, the establishment of interpreter education programmes funded by the state have led to state funded interpreting services

(e.g. Finland, the Netherlands, Belgium); in such contexts, when graduates emerge from these programmes, their names are added to the listings of those already working via state-funded interpreting services. That is, *de facto* registers of interpreters exist in some countries.

In other countries, the association of sign language interpreters holds the register (e.g. Canada, Scotland). In Canada, the national register was established in response to Canadian interpreters going to the USA for registration in the absence of a Canadian model (Russell and Malcolm 2009).

In some countries (notably, parts of the USA), many States have adopted legislation that offers protected title and/or protected function status to interpreters – that is, one cannot call oneself an interpreter if one is not appropriately licensed. To do so is to risk a fine and a potential term of imprisonment. However, such highly legalised, statutory, approaches are still rare and the majority of registers of interpreters are voluntary rather than statutory in nature. In some countries, the question of establishing statutory registration has arisen in the past 12-24 months (notably Australia and the UK). In Australia, it seems that at present, the National Accreditation Authority for Translators and Interpreters (NAATI) will not pursue statutory registration, but instead, is currently in process of revising its' protocols. In the UK, however, the National Registers of Communication Professionals working with Deaf and Deafblind People (NRCPD) has adopted a position that is pro-statutory registration and is currently embarking on work towards that end goal[3].

With expanded legal/constitutional recognition of sign languages in many territories, governments are also increasingly interested in the quality assurance of interpreting services provided via the public purse. In several countries where the national sign language has been recognised, boards have been established to oversee issues pertaining to language planning and promotion. For example, some instances, there are boards established to oversee issues relating to interpreting (e.g. Finland, Austria) and these typically involve a range of stakeholders including representation from the Deaf community and the interpreting community.

2. Features of National Registers

The literature varies in terms of the degree of detail provided regarding the features of national registers. Some countries provide a great deal of information around testing, criteria for success, and results. Some countries provide detail as to what an interpreter must do to maintain their registration (should post-registration criteria apply), for example, with regard to continuous professional development (e.g. New Zealand, USA, UK). However, many questions that arise cannot be answered via the available published/ online literature, for example, we cannot say what pre-clearance checks such as police clearance are in place (if any) or if indemnity insurance must be provided by the interpreter as a precursor to testing and/or to maintain their place on the register for most countries. However, we can offer a snapshot overview here (with greater detail offered in the country-by-country review that follows) of the general approaches taken to interpreter registration.

What we cancan say is that there are differences that emerge in terms of how categories of prospective interpreters are handled in different countries. In many countries, those who complete a recognised course of study (e.g. typically a Bachelor or Master level degree in interpreting), are admitted to a register on completion of training. In such instances, a register can be either an "official" statutory register, a *de facto* register held by the body that employs or refers interpreters. Sometimes this happens automatically (Netherlands, Finland, Belgium, and Sweden); sometimes the course has to undergo an accreditation process (UK); and sometimes the graduates must complete an interpreter education programme AND present

3 http://www.nrcpd.org.uk/statutory-regulation

individually for assessment (USA, Canada, Austria). In some countries, there is a move away from individual assessment and towards accreditation of courses (e.g. Australia).

If a candidate has not completed an interpreter education programme, some countries facilitate the testing of individuals (e.g. Brazil, Austria), especially where lesser used languages are concerned (e.g. Australia). Such models are sometimes also made available to Deaf Interpreters (e.g. Australia). However, increasingly, candidates for testing are expected to have completed an interpreter education programme (UK, Austria, Canada, and Australia). This leaves many gaps, particularly for Deaf interpreters, a growing category of interpreters; in many countries Deaf interpreters cannot yet complete registration examinations on par with hearing peers as examination systems have not yet been developed, tested and reviewed for the language pairs that they work between (e.g. Canada, Sweden). In some countries, alternative mechanisms for recognising their skill-set currently exist (e.g. Australia).

3. How was policy developed, supported, resourced, implemented and monitored?

This third question relates to the development of policy, resourcing, implementation and monitoring of registration as well as the issue of cost (resourcing). We have already noted that it has been difficult to identify published sources that outline the drivers for registration in many countries. Discovering cost-models and funding mechanisms for registration processes also proved challenging. Indeed, as this is a question that is not referred to as a matter of course in the literature reviewed, we had to come at it "sideways", via accounts reported for the companies that handle registers (where available). For example, in the USA, the estimated cost of test development and implementation is published by RID in their annual reports. Given their commitment to developing psychometrically valid tests, RID projected a $253,340 investment in their National Interpreter Certification (NIC) exam development (RID Annual Report 2015). This covers the development of knowledge-based tests, performance-based tests, development of scoring systems, filming of test items, rater-training and interpreter costs for meetings. While some of these costs might be scalable, core costs for test development, testing, piloting and rater-training would remain should Ireland choose to follow this route. We should note that RID has a membership base of 15,221 (RID Annual Report 2015) and reports total net assets of $186,955 (ibid.). We should also note that the USA has separated out liability for interpreter association work from that of registration and evaluation via the establishment of the Center for the Assessment of Sign Language Interpretation (CASLI).

In the UK, the Council for the Advancement of Communication with Deaf People (CACDP), the organisation that reports on costs associated with the NRCPD, reported a total income of £227,666 from registration as well as £1,285,645 from examination and centre registration fees[4]. At the same time, expenditure on these items ran at £710,380 for examination and centre registrations and £304,059 on registration. Estimates of costs must be weighted up against the fact that the NRCPD registers a broad range of professionals in addition to sign language interpreters. Further, there are issues of scale arising vis-à-vis number of potential registrants on an annual basis. The issue of cost has also arisen in the UK in discussion relating to how statutory registration would impact on membership fees for those on the register. At the Association of Sign Language Interpreters (ASLI) 2016 conference, Alan Peacock, Interim Director and Registrar of NRCPD acknowledged that membership fees would have to cover costs that would associate with complaints procedures/ investigations and legal advice that may be required over time should statutory registration be introduced. NRCPD note that:

4 See: https://beta.companieshouse.gov.uk/company/03581178/filing-history

"We don't know how much it will cost. However, at the moment the work we are doing to prepare for statutory regulation represents no extra cost. It is part of the development and improvement of NRCPD, so we would be doing it anyway."[5] They also note that given the current work-plan, they are not therefore planning to raise fees.

What is clear is that regardless of the voluntary or statutory standing of a register, there are costs associated with the establishment, maintenance and development of same. SLIS would have to consider how scalable these costs would be vis-a-vis the Irish context and explore the potential for statutory investment in a model that is fair, impartial and offers added value in terms of quality control.

Sign Language Interpreter regulation v spoken language interpreter regulation

In conducting this work, we found that our findings regarding the nature of regulation of sign language interpreting mapped closely to those outlined in an international review of spoken language interpreting, conducted by the Federation of Interpreters and Translators (FIT). Stejskal (2005: 3) notes that, for spoken language interpreters

> "…the credentialing process occurs under three possible scenarios: certification by a professional association; certification by a government; and certification by an academic institution. Certification by a professional association is strongest in common law countries, whereas certification by a government body is usually employed in civil law countries. Academic programs exist in both civil and common law countries, and are particularly strong in countries where certification is not offered by the government or professional associations." (Stejskal 2005: 3)

Stejskal's (ibid) analysis holds true for the credentialing of sign language interpreting too, though we note that for many countries, where a professional association leads occupational regulation processes, they tend to work in close partnership with Deaf community organisations (e.g. USA, Canada, Austria, Finland).

We also find that, in general, a relationship holds between the status of a sign language in a given territory, the education of interpreters and the regulation of sign language interpreting practice in that jurisdiction. We further find that there are increasing calls towards regulation of interpreting (both spoken and sign language) at pan-European level (via EU Directives, and via organisations like the European Union Legal Interpreter and Translators Association (EULITA), for example). In some countries which have voluntary registers, there are now moves in the direction of statutory regulation (e.g. UK), while in other countries, the protocols surrounding voluntary regulation are under review (e.g. Australia, Canada, and USA).

However, voluntary certification systems are the most common mechanism for managing regulation of the interpreting profession at this time and, regulating bodies (be they professional associations or consortia managing a voluntary register; or statutory agencies operating on the back of legal instruments) often recognise or accredit interpreter education programmes

5 http://www.nrcpd.org.uk/statutory-regulation

(IEPs), facilitating the automatic registration of graduates of their programmes to the register (e.g. Finland, Austria, UK). In other places, completion of a recognised IEP programme is a pre-requisite to undertaking testing (e.g. Canada).

We also note that internationally, there is a dearth of empirical data underpinning the testing of interpreters on the one hand, and the impact that occupational regulation has on stakeholders. There is also a dearth of evaluation of the impact of policy regarding the registration of interpreters. This points to significant gaps that SLIS and other stakeholders in the Irish context could work towards bridging in order to ensure a solid foundation for any developments in Ireland, and, at the same time, contribute to the international body of knowledge on these fronts. Such work would require further investment.

While acknowledging these gaps, this report builds on learning from international practice, derived from a review of sign language interpreting regulation in 11 countries and a broad range of academic writing and published reports describing, reviewing and evaluating systematic approaches to occupational regulation. Assuming that a degree of regulation serves to increase minimal standards for entry to the profession, ensuring better standards of performance and thus safeguarding stakeholders, this report presents 11 recommendations:

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 which underpin minimum standards required for practice. 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)[6]. 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.

6 http://www.ecml.at/ECML-Programme/Programme2012-2015/ProSign/tabid/1752/Default.aspx

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 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.

The thrust of the recommendations, as they apply to interpreters seeking registration, can be seen in Table 10. We appreciate that these are notional in nature, and emphasize that they are intended as a skeleton outline, and as a starting point for discussion.

1. Sign Language Interpreting Service (SLIS)

SLIS is the national sign language interpreting service for Ireland, established in 2007 following a review of sign language services in Ireland conducted for the Citizens Information Board (CIB).

The SLIS mission is to ensure that Deaf people can participate as full and equal citizens by promoting, advocating and ensuring the availability of quality interpretation services to Deaf people in Ireland so that they can access public and social services.

SLIS is funded and supported by the CIB, and provides a range of services.

- We operate IRIS – Irish Remote Interpreting Service.
- We manage a service for the HSE for interpreting for GPs appointments.
- We maintain a 24 hour emergency response service to engage interpreters.
- We administer a Social Interpreting Fund (e.g. funerals and hardship cases).
- We support the quality of interpreting (e.g. hold a register, provide training and information supports).
- We operate a Referral Service linking the Deaf community and service providers to Interpreters.
- We provide support to improve accessibility for Deaf citizens to rights, entitlements and services

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2. Introduction

Incompetent interpreters "… may lead to the violation of the civil and human rights of those involved" (Committee on Overseas Professional Qualifications 1977:14)

This document seeks to review policy and any associated regulations that cover sign language interpreters internationally to consider the most appropriate route for regulation of sign language interpreting. Here, we use the term 'regulation' to mean any kind of requirements that are put in place to police participation in the field – for example, by establishing a minimum level qualification for entry to the field, via verification of skill-sets or competencies for practice, or by introducing requirements to be a member of a register, be that voluntary or statutory.

In doing this, we also draw on examples for the regulation of spoken language interpreters, but our primary focus is on standards applied to sign language interpreter regulation. We consider sign language interpreting in the widest sense, incorporating consideration of those working between Irish Sign Language and English, but also those working between Irish Sign Language and other languages, spoken and signed (e.g. British Sign Language, American Sign Language, International Sign, Irish, French, etc.). Those who undertake work between sign languages, and increasingly, in translation work, are often deaf. We are mindful that the process toward professionalization of the field of sign language interpreting is still in its' early days, especially with regard to recognition of the role played by Deaf Interpreters. We wish to insure that the review presented here is as inclusive as possible, and as such, reference to the regulation of Deaf Interpreters and Deafblind interpreters is included. While they have not yet been regulated in any way in Ireland, there are a small number of places where Deafblind interpreting is certified, and we therefore include reference to this group too, where we can.

Concerns around ensuring that those working in the field are fit to practice is something that has concerned key stakeholders in Ireland since the mid 1990s, a period that coincided with the emergence of a trained cohort of interpreters, an increased level of engagement in civil society by members of the Deaf community, and investment in interpreter provision via the establishment of the first state funded interpreting agency, Irish Sign Link. As we shall see, similar synergies have led to calls for, and implementation of regulation in other jurisdictions; they are drivers of change. We begin by documenting the current pathways to practice in Ireland.

We then turn to explore the range of processes that have been put in place to regulate entry to the profession internationally. We look at statutory versus voluntary registration processes and consider more recent developments in many countries to establish a mandatory process of continuous professional development (CPD) (with the units collated by practitioners sometimes referred to as continuing education units (CEUs)). We provide an overview of provision, drawing on practices in place in countries around the world, including well known, oft-referenced systems in place in the USA and Canada as well as lesser-known approaches, for example, the certification of interpreters in Austria, Belgium and Brazil. While a detailed analysis of each system is not possible here, we provide an extended overview of three systems: (1) Australia's NAATI certification, which is currently in a process of review and change, (2) the USA's RID certification process and (3) the UK's NCRPD certification, with mention of Scotland's SASLI registration process. These have been selected because in all three jurisdictions these systems

have attempted to provide for registration processes for entry-level professionals working between spoken and signed languages, and all have categories of certification available to Deaf interpreters. All three jurisdictions have – or are in the process of – reviewing their approaches and all have extensive experience of working on a large scale. We also list key points for consideration arising from review of processes in each country reviewed.

We then turn to the impact that regulation has on quality, along with any other ramifications that may arise. In this discussion, we draw on the UK's Commission for Employment and Skills' extensive international review of occupational registration and its impact (2011)[7]. Finally, we consider the range of options available in an Irish context in the short, medium and longer term, being mindful of the broader context in which interpreter education and interpreter provision exists.

We begin by providing an overview of this broader context.

7 See: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/306359/ER40_Occupational_regulation_impact_-_Oct_2011.pdf

3. The Irish Context

"Accreditation and a formal registration process for interpreters is one of the most urgent priorities in developing SLI services in Ireland" (Comhairle 2006: 73).

3.1 Towards regulation of sign language interpreting in Ireland: A Retrospective View

The field of translation and interpreting – for spoken and signed languages alike - is not a "protected profession" unlike many other practice professions (e.g. nurses, dietitians, physiotherapists, occupational therapists, social workers, speech and language therapists, engineers, solicitors, barristers, hearing aid dispensers, etc.). That is, in most jurisdictions, interpreters do not have protected titles. (If a profession has a protected title, it means that a person commits an offence if they use a protected title with intent to deceive, and are not registered with the national (statutory) register. It is also an offence to imply membership of a statutorily regulated profession. An example of this would be a person who claims to provide chiropody services when they are not registered with the UK's Health and Care Professionals' Council as a chiropodist and podiatrist[8]).

While sign language interpreting has been documented in public service settings since the 1880s – for example, Leonard (2016) reports on a sign language interpreter in court in 1884 - the role of interpreter was traditionally taken on by teachers of the deaf, children of deaf adults and members of religious orders, as well as by family members and friends of sign language users. The professionalization of the role is, in an historic context, a very recent development.

Prior to 1994 there were no full-time, trained interpreters available. Leeson and Lynch (2009) report that by 1994 some 20 people, among them some of those who had completed the first formal training programme for interpreters in the history of the state (in an EU funded Trinity College Dublin -Bristol University project, in partnership with the Irish Deaf Society), offered themselves in this capacity, leading to calls for regulation. In response, a working group comprising organizations of Deaf people, service providers, interpreters, and ISL teachers negotiated the establishment of Irish Sign Link, a national ISL-English interpreting agency. It was agreed that interpreters who wished to work through Irish Sign Link must first undergo assessment to ensure the quality of interpreting offered.

Testing comprised five tasks: (1) a translation from ISL to written English, (2) a simultaneous interpretation from ISL to English, (3) a simultaneous interpretation from English to ISL, (4) simultaneous interpreting in a simulated setting (i.e., a role-play scenario), and (5) an interview with the assessment panel to ascertain the candidate's knowledge and experience (Accreditation Board, 1997).

Following from the first registration process in 1997, some 15 interpreters were included on Irish Sign Link's books (Leeson and Lynch, ibid.). A second round of assessment took place in 1999, bringing the number to the mid-20s. In 2006, a third round of assessments took place. Leeson and Lynch report that some 29 candidates

8 See: http://www.hcpc-uk.org/aboutregistration/protectedtitles/

went forward for assessment, including 5 deaf interpreters. Following this process, a total of 38 interpreters were registered with Irish Sign Link (See Table 1 below).

It is important to note that, as it currently stands, the SLIS register does not have any legal standing (i.e., it is not a statutory register that licenses the right to practice). However, it has served the function of establishing a fitness to practice protocol for interpreters who wished to work via SLIS, offering reassurances regarding interpreter competence to SLIS's stakeholders in the Deaf community and beyond. However, it is also necessary to acknowledge that there has been some criticism of the testing processes historically applied. Notably, the test for generic practice was the same as that which purported to evaluate fitness to work in legal or medical domains without establishing criterion for testing for such environments. This led to some stakeholders assuming that they were securing the services of a "legal" or "medical" interpreter, when no specialist training or assessment for these domains actually exist. (This, an issue of validity, is one that has also been raised in other jurisdictions too (Hale 2012)). Further, there were issues regarding how an interpreter who was assessed as performing at a particular level could progress to a more advanced level or registration in the absence of regular examination opportunities (Comhairle 2006). This, in turn, has impact for quality assurance for stakeholders (how can veracity of skills of interpreters be determined several years after testing had occurred?) and financial implications for interpreters (interpreter fees differ depending on registration status, but no ongoing assessment protocol is available to change registration status since the last round of testing).

Another key finding from the Comhairle report (ibid.) was that accreditation for individual interpreters should not be a 'once in a lifetime' event (and indeed, SLIS re-ran assessment processes on a number of occasions from 1999-2006). While the report proposed regular re-testing, this is (as we shall see) out of step with international best practice where certification maintenance programmes are more typically in place, requiring certified interpreters to maintain logs relating to professional development, and, in some instances, to demonstrate that they are continuing to practice in the field of interpreting. Comhairle (ibid.) also reported the view that the interpreting profession and the Deaf community should be involved in the process of regulation, a point we shall return to again later in this document.

While there were some concerns relating to the SLIS register (and this was also true of its' predecessor, Irish Sign Link), it is important to remember that the register has served the function of offering an independent point of reference for fitness to practice for Deaf community members and offered those who had not accessed formal training a route to community endorsed practice. This was particularly relevant as interpreter education moved from ad-hoc provision dependent on EU funding to regularized programmes, including a state-funded 4-year Bachelor programme. The SLIS assessment has also provided a route to acknowledge Deaf Interpreters' skills in the interpreting domain in an Irish context.

Table 1: Registration of Interpreters in Ireland: Irish Sign Link and SLIS

R1 – Registered Qualified Interpreter (Advanced) [formally RQI] 18
R2 – Registered Qualified Interpreter [formally RTI] 14
TI – Registered Trainee Interpreter 6
(Deaf Interpreters: 5 – included in figures for R1 and R2)

(SLIS, personal communication, October 2007)

Irish Sign Link disbanded in 2007, and was replaced by Sign Language Interpreting Services (SLIS), a state-funded body, whose goal it is to ensure the effective delivery of high- quality interpretation services and to work towards making public services accessible to the Deaf Community. Funding comes via the Citizens Information Board. While a review of services undertaken by Comhairle (2006) recommended that an accreditation process be established, it is important to note that the fundamental nature of SLIS has shifted: while originally functioning as an interpreting agency, SLIS now provides an interpreting referral service, and is also the provider of an emerging, very well received remote interpreting service, IRIS (SLIS 2016), and their mission statement states that:

> "SLIS will promote, represent, advocate and ensure the availability of quality interpretation services to Deaf people in Ireland."

We must also be mindful of the fact that since the mid 1990s, the Irish interpreter provision landscape has shifted, and there are now a number of private agencies that operate on the market who must also be invited to become part of the conversation around the development of a national system of accreditation or registration.

The goal of a national register – be that voluntary or statutory – is one that key stakeholders closely aligned to the Deaf community ascribe to. For example, the Council of Irish Sign Language Interpreters (CISLI) includes reference to the establishment of a national registration process as one of its' key aims:

> 'To lead the development of a national registration process for Irish Sign Language interpreters through the partnership with the national Deaf-led organisation, with the key stakeholders (sign language interpreter service providers and interpreter trainers)[9]'

CISLI led initial discussion with SLIS, Bridge Interpreting, the Centre for Deaf Studies and the Irish Deaf Society in 2012-13 and these stakeholders are committed to the goal of collaboration towards the aim of establishing a register. In 2016, SLIS picked up this critically important matter and led discussions with CISLI, members of the Deaf community, Trinity College Dublin and interpreting agencies. SLIS also commissioned this research and is actively seeking to bring forward the issue of registration.

3.2 European Directives and Supporting Documents

The issue of registration is one that aligns well with calls for regulation and registration expressed in a number of pan-European documents (European Parliament 1988, 1998; Council of Europe 2003), including a number of European Directives. For example, Par. 6 of Directive 2005/36/EC of the European Parliament and of the Council of 7 September 2005 on the recognition of professional qualifications pays particular reference to public health, stating that:

> "The facilitation of service provision has to be ensured in the context of strict respect for public health and safety and consumer protection. Therefore, specific provisions should be envisaged for regulated professions having public health or safety implications, which provide cross-frontier services on a temporary or occasional basis."

9 https://cisli.ie/home/aims/

While not specifically focusing on interpreters, it is clear that the terms of reference considered in Directive 2005/36 has implications for interpreters working in healthcare settings.

Also concerned with specialist fields, in this case, interpreters in criminal legal proceedings, Directive 2010/64/EU on the right to interpretation and translation in criminal proceedings makes explicit reference to the need for a register of interpreters working in legal settings. Article 5, Par. 2 notes:

> "In order to promote the adequacy of interpretation and translation and efficient access thereto, Member States shall endeavour to establish a register or registers of independent translators and interpreters who are appropriately qualified. Once established, such register or registers shall, where appropriate, be made available to legal counsel and relevant authorities."

While the Irish Statutory Instruments (S.I. 564/2013 and S.I. 565/2013) that transposed this Directive to Irish law make no reference to a register (voluntary or statutory), there are pre-existing requirements for providing interpreters in criminal settings in place (European Convention on Human Rights Act 2003). Directive 2012/29/EU, which establishes minimum standards on the rights, support and protection of victims of crime also makes reference to the right to interpretation and translation, in many ways building on the principles enshrined in Directive 2010/64. Further, the European Commission (2009), also focusing on interpreters in legal settings, reported that:

> "EU Member States should provide appropriate training both for new and already practising legal interpreters… such training should lead to a nationally recognized professional certification and be accredited by a recognized authority… efforts should be made to develop equivalent training throughout the EU to ensure consistency, mutual trust and cooperation; and …training should also be provided to legal professionals on how to work across languages and cultures and with interpreters."

We note that at present, this is not the case in most countries of the European Union (Napier and Haug, in press) or, on the basis of study undertaken for this review, in place in the broader international context.

Thus, we can see that there are calls, both nationally (from stakeholder groups) and at a pan-European level, to ensure that consideration is given to appropriately accredited training and registration of interpreters working in public sector domains (also called "community interpreting" domains – for example, see: ISO 2014).

Indeed, the International Standards Organisation (ISO) have published criteria for service providers to determine that interpreters (of spoken and/or signed languages, including Deaf Interpreters) recruited are appropriately credentialed and/or experienced to undertake the task at hand. They advise that interpreter service providers should:

> "…verify and be able to provide verification, by seeking documented evidence, that the community interpreter can meet at least one of the following criteria:

a) a recognized degree (e.g. BA., MA. or Ph.D.) in interpreting from an institution of higher education, or a recognized educational certificate in community interpreting;
b) a recognized degree in any other field from an institution of higher education plus two years of continuous experience in community interpreting or a relevant certificate from a recognized institution;
c) an attestation of competence in interpreting (such as interpreter certification) awarded by an appropriate government body or government-

accredited body or recognized professional organization for this field, and proof of other equivalent qualifications or experience in community interpreting;

d) membership in an existing nationwide register of interpreters with clear qualification criteria meeting as a minimum the competences requirements of this International Standard.

e) five years of continuous experience in community interpreting in cases where a) to c) cannot be reasonably met.

f) a certificate of attendance to further vocational training modules upon request.

This guidance is made with an appreciation of the diversity of opportunity for interpreter education that has existed (and, in many countries, continues to exist), and in many ways, it facilitates a "Grandfather clause" approach, namely, allowing for development over time while allowing that certain new regulations will not be applicable in certain circumstances to certain categories of individuals due to pre-existing conditions. Many of these principles are, as we shall see, also reflective of the practices that many countries have adopted in working towards the professionalization of community interpreting, and in the establishment of national/ state-wide registers of interpreters.

Against this backdrop, we can say that the island of Ireland has over 110 interpreters formally trained at a variety of levels, with some 38 having successfully completed either the Irish Sign Link or SLIS examination processes. The issue of consolidating previous processes, potentially grand-fathering in those who have already completed assessments via these routes, while considering a road map for future regulation – voluntary or statutory – of interpreters is timely.

3.3 Training to be a sign language interpreter in Ireland: 1992-present

While interpreter training slowly emerged in Ireland in the early 1990's with European Union funding for *ad-hoc* two-year programmes (Trinity College Dublin and Bristol University 1992-4; NUI Cork and Bristol University 1998-9) as well as a 6 month programme established between the National Association of the Deaf (NAD) and the Royal National Institute for the Deaf (RNID) in 2004, by 2001 there were some 25 trained interpreters in Ireland serving a community of an estimated 6,500 Irish Sign Language users on the island of Ireland (Leeson and Lynch 2009, Leeson and Saeed 2012).

There are currently two pathways to foundational interpreter education in Ireland: completion of the Bachelor in Deaf Studies (ISL/English interpreting strand) at Trinity College Dublin or completion of the Signature National Vocational Qualification (NVQ) pathway.

In 2001, the Centre for Deaf Studies was established at Trinity College Dublin (TCD), an institution with a relationship to education and deafness spanning back to the early 19th Century. From 2001-10, the Centre offered a two-year full-time Diploma course. In 2010 the last cohort from this programme graduated, with the Diploma course replaced by a four-year full-time honours degree programme leading to a Bachelor in Deaf Studies qualification, with a specialism in interpreting. Trinity College Dublin now offers a 4 year, full-time honours degree, mapped to Level 8 in the Irish National Framework of Qualifications (NFQ). Candidates must accrue 240 credits (60 per year) in order to graduate, in line with Bologna Agreement protocols (Bologna Follow-up Group 2005). Students may enter the programme with no prior knowledge of Irish Sign Language and select the interpreting route on completion of their second year of studies. To gain entry to the interpreting route, students must have achieved a II.1 (60% or above) in their Irish Sign

Language modules and their "Introduction to Interpreting and Translation: Philosophy and Practice" module. Every module completed is assessed and students must pass each module to progress, including placements in the community. External examination, drawing on established experts from European interpreter training programmes is central to the process of quality control. Students who fail to successfully complete 240 credits, but who have successfully completed 180 credits may seek to be awarded an ordinary Bachelor in Deaf Studies degree (Level 7 qualification), but this *not* an interpreting qualification. The first cohort of interpreters from the Bachelor in Deaf Studies (hons.) graduated in 2013.

The Signature qualification in interpreting is offered on a full or part-time basis: students are required to complete NVQ Level 6. Crucially, it is a qualification "designed to provide those who are working or training as interpreters with the underpinning knowledge, understanding and skills in order to effectively fulfil the role." Candidates must successfully complete five units (four of which are mandatory) in order to be awarded the full qualification. Candidates must provide proof of their interpreting competence, mapped against the (British) National Occupational Standards by compiling a portfolio of evidence covering the five chosen units. Signature approved centres internally assess and verify all units. External quality assurance is provided by Signature[10]. The first cohort of Signature Level 6 interpreters graduated in the Republic of Ireland in 2016. There is also the potential for ISL interpreters in Northern Ireland to complete Signature's NVQ6 pathway with a local provider in the province and we understand that just one ISL/English interpreter has completed this route to date (ASLI Northern Ireland, personal correspondence, June 2016). It is also possible for ISL interpreters to register with the UK's NRCPD[11]. Educational programmes can also seek accreditation via Signature, facilitating entry to the NRCPD register for appropriately qualified graduates.

While these are the current foundational pathways to interpreter education, there has also been a small window of opportunity regarding a post-graduate interpreting qualification in recent years. In 2012-13, Queen's University Belfast accepted students with ISL/English and BSL/English backgrounds onto their MA in Interpreting programme. For entry to the MA[12], candidates are required to hold a II.2 undergraduate honours degree, although those without this "who possess relevant professional experience may be permitted the opportunity to demonstrate achievement at an equivalent level. Students must demonstrate a high level of proficiency in both their language pairs." Further, it is noted that:

> "It is anticipated that most BSL students will come via an agreed articulation with Belfast Metropolitan College (applicants must have Junior Trainee Interpreter Level 6, as defined in CILT's UK Occupational Standards and Signature:
>
> http://www.signature.org.uk/page.php?content=10. Level 6 is the equivalent of an undergraduate degree)." [13]

10 http://www.signature.org.uk/qualifications.php

11 http://www.nrcpd.org.uk

12 We note that many interpreters who have completed a foundational interpreting qualification in the higher education sector have continued to further education. Several have completed Bachelor or Masters degrees in complementary fields such as education, inter-cultural studies, linguistics, equality studies, community studies, legal studies, and ethics and a small number have progressed to PhD candidacy.

13 See: https://www.qub.ac.uk/directorates/media/Media,484775,en.pdf

Unfortunately, to date, only 1 candidate has successfully completed this pathway (Dr. Piotr Blumczynski, QUB, Personal communication, 27 June 2016). Dr. Blymczynski notes that 2012-13 was the one and only time that this programme was offered, due to a shortage of properly qualified candidates. He reports that a critical mass of prospective sign language interpreting candidates is slowly gathering again and it is likely that QUB will offer this MA route in 2017-18, though probably only for English-BSL.

Another avenue that is available, but which no ISL interpreter has yet taken up, is the European Masters in Sign Language Interpreting (EUMASLI). This is a programme offered between Heriot Watt University (Scotland), the HUMAK (Finland) and Magdeburg University (Germany)[14]. Candidates must hold an undergraduate degree, preferably in sign language interpreting or a related subject, have a minimum of three years' experience practicing as an interpreter and English language competency to B2 level (Common European Framework of Reference for Languages (CEFR), 2001). However, given that this programme is geared towards established interpreters, it should not be considered as an entry-level threshold for practice.

With this broad range of pathways to practice, ranging from no formal training to MA degrees in interpreting, interpreters across Ireland present themselves to the world of work. We should also be mindful of the fact that the majority of interpreters are female (Napier and Leeson 2016) and a majority are second language learners of Irish Sign Language: Leeson (2012) reports that of the interpreter students who went through the Centre for Deaf Studies from 2001-10, at least five out of every six interpreting graduates has no familial connection to the Deaf community (parent, sibling, child) nor partner who was deaf. Coupled with limited access to formal ISL instruction to Leaving Certificate standard, the linguistic landscape throws down many challenges to facilitating the linguistic level of competence to the standards required in a course of study (See efsli 2013).

Table 2 offers an indicative overview of numbers of ISL/English interpreters who have been trained/registered in Ireland (both ROI and NI) to date via the pathways described.

We should also point out that many interpreters have left the field and some of those remaining work part time. The consequence of this is that the number of interpreters currently available for work on any given day is significantly less than 111.

14 See: www.eumasli.eu

Table 2: Trained/Registered Interpreters in Ireland 1992-2016

Training Institution/ Registering Body	Timeframe	Level of Training	Graduates
Trinity College Dublin and Bristol University	1992-4	2 years full-time leading to a Diploma in Deaf Studies (Interpreting)	9
NUI Cork and Bristol University	1998-9	2 years full-time leading to a Diploma in Deaf Studies (Interpreting)	10
Trinity College Dublin Centre for Deaf Studies (CDS)	2003-10	2 years full-time leading to a Diploma in Irish Sign Language/ English Interpreting	60
Trinity College Dublin Centre for Deaf Studies (CDS)	2013-15	4 years full-time leading to a Bachelor in Deaf Studies (Irish Sign Language/English Interpreting) *(including class of 2016 (5) due to graduate autumn 2016)*	23
Royal National Institute for the Deaf (RNID)/National Association for the Deaf (NAD**)	1994	6 month training period – No formal qualification	13*
Signature CSL, Galway	2016	NVQ Level 6	4
Signature, Northern Ireland	unknown	Various levels of qualification held, but not NRCPD registered	3
NRCPD	unknown	NRCPD registered	1
Queens University Belfast	2013-present	NVQ Level 9	1
Subtotal			*=124*
*Less overlap**			*Total* *120-9 for overlapping students* *=111*
Total			**111**

*= some overlap (n=9) as some RNID/NAD candidates later completed further training at CDS
** = NAD has since changed their name to DeafHear.ie and RNID has changed their name to Action on Hearing Loss.
(Adapted and updated from Leeson 2012)

Agencies drawing on this pool of interpreters include SLIS, Bridge Interpreting, CSL as well as spoken language interpreting agencies like Word Perfect and Translation.ie, who tend to have secured tenders for public service interpreting provision to the Gardaí, the Courts Services, and to health care providers. Given the lack of protected title/function for interpreters, coupled with the lack of a statutory or regularly updated national voluntary register, the issue of who is considered fit to practice, and for what settings, is highly fraught. Given the shift away from community-driven pathways to interpreting, in existence prior to the establishment of training, whereby Deaf community members invited someone to interpret for them, today, the Deaf community does not have the same levels of control vis-à-vis gate-keeping those deemed appropriate to interpret. This is not a uniquely Irish problem (See Cokely 2005a for discussion of the challenges in this regard in North America).

We must also note that the Irish Deaf community served by this community of sign language interpreters has changed significantly in the past 25 years. Given the move towards mainstreamed education, the community – and therefore Irish Sign Language - is more fragmented than previously, leading to greater levels of variation (sometimes idiosyncratic, sometimes regionalised) than previously existed (Leeson and Saeed 2012). An increasing number of Deaf people are accessing higher education, facilitating a movement into academic and professional life that was not possible 25 years ago. With these shifts in access to higher education for a "guesstimated" 4% of sign language users (Leeson 2012) (which suggests that Irish deaf people are ten times less likely to attend tertiary education than their hearing counterparts), there is increasing demand for interpreters to demonstrate competence in a broad range of subject specific domains in which there may not be an established lexicon or register in operation (Leeson 2005, Napier and Leeson 2016). It is here that the bulk of regular interpreter work is based as it is in this setting that funding for interpreting has been provided for more than two decades. In contrast, funding for interpreting in other settings is not as well established, meaning that Deaf community members likely to work with interpreters in legal and healthcare settings are less likely to have had extensive experience of working with interpreters or access to higher education, potentially providing greater challenges in terms of bridging the "Fund of Information" gap that may exist (Dean and Pollard 2013). Such contexts also potentially require greater effort on the part of Deaf clients (figuring out the pragmatics and the context, understanding the terminology specific to the domain, understanding the interpreter, etc.) (Leeson 2014, Napier and Leeson 2016, Haug et al. (in press)). Another hallmark of recent years is the increased mobility of peoples; immigration has led to an increase in the number of Deaf people who are users of other sign languages, and who may come to learn Irish Sign Language as a second/subsequent language (e.g. see Napier and Leeson 2016 for a more generic discussion of this issue). While these are aspects of the broader context, these issues may not be addressable via a registration process, but they point to the complexity of the current landscape in which interpreters operate.

3.4 Associations of Signed and Spoken Language Interpreters in Ireland

3.4.1 The Council of Irish Sign Language Interpreters (CISLI)

CISLI was founded in May 2011, replacing its predecessor, the Irish Association of Sign Language Interpreters (IASLI). The goals of CISLI are to: advance the profession, rights and interests of sign language interpreters; work in close partnership with the National Deaf-led organisation for the future benefit of both Deaf people who use Irish Sign Language and professional interpreters, Deaf and hearing, whose working languages include a signed language. This coincides with the agreement set forward by the World Federation of the

Deaf (WFD) and the World Association of Sign Language Interpreters (WASLI) to support collaboration, cooperation and mutual, transparent communication between the Deaf community and Sign Language interpreters at international, national, regional and local levels; and encourage best practice in Irish Sign Language interpreting.

CISLI's stated objectives include the goal of leading development of a national registration process for Irish Sign Language interpreters through partnership with the national Deaf-led organisation, with the key stakeholders (sign language interpreter service providers and interpreter trainers). They also seek to provide advice and support to users and providers of interpreting services and other interested individuals and/or organisations, especially through their proposed Board of Evaluators of Interpreting (BEI). CISLI sets out to represent the interests of the profession of Irish Sign Language interpreting to appropriate bodies, to encourage and promote initiatives to improve standards of Sign Language interpreting and interpreter training on the island of Ireland. Another key objective is CISLI's commitment to work to secure recognition of the profession of Irish Sign Language interpreting[15].

There are four categories of membership: (i) Active Membership, (ii) Associate Membership, (iii) Student Membership and (iv) Affiliate Membership.

Active Membership is exclusively open to Deaf and hearing professional Interpreters. Candidates seeking Active Membership must have completed a third level interpreter training qualification or have successfully completed the Irish Sign Link (1997, 2000, 2006) or Sign Language Interpreting Service (SLIS) assessment processes or hold Membership of the Register of Sign Language Interpreters, administered by the National Registers of Communication Professionals working with Deaf and Deafblind People (NRCDP).

Associate Membership is open to those who have acted as Deaf interpreters while working as (for example) Deaf classroom assistants in schools or special units, or while working as Deaf Community Resource Officers. Volunteer Deaf relay interpreters with experience of Deaf Blind interpreting within the Deaf community can also seek to become Associate members. This category of membership is also open to those who have some interpreting and/or translation experience who have not yet received formal training or completed either Irish Sign Link or SLIS assessment, but who are committed to completing such an assessment at a future point in time.

Student Membership is open to individuals enrolled on a recognised third level Deaf Studies or interpreter training programme. Affiliate Membership is open to individuals and organisations who, though not interpreters, wish to support the aims of CISLI.

CISLI is a member of the European Forum of Sign Language Interpreters (efsli), and, via efsli, has an association with the World Association of Sign Language Interpreters (WASLI).

3.4.2 The Irish Translators and Interpreters Association (ITIA)

The Irish Translators' and Interpreters' Association (ITIA) works towards standards of certification and functions as the national directory of T&I practitioners and as a certifying authority for translators. ITIA also counts several sign language interpreters amongst their membership, which is streamed at a number of levels:

> Professional Membership is awarded to translators or interpreters who meet the strict criteria of the ITIA based on qualification and level of experience. Applicants must also pass the annual Professional Membership Examination (translator or interpreter) set by the ITIA.

15 https://cisli.ie

Associate Membership may be granted to holders of a third level qualification in translation and/or interpreting and/or languages or to holders of a third level qualification with relevant experience.

Affiliate Membership is generally availed of by people with a professional interest in translation and interpreting, by those with a general interest in these professions or by professionals from other sectors who wish to work in the area of translation or interpreting and do not currently have a specific qualification or experience in the area

Student Membership is available to persons undertaking undergraduate studies in any discipline or those undertaking postgraduate studies in translation or interpreting.

The ITIA offers regular CPD courses to its members on aspects of the translating and interpreting professions but does not offer full-time courses in these areas.

The Irish Translator and Interpreters Association (ITIA) has been calling for the establishment of a statutory register to protect the public and ensure professional interpreters provide quality services for over a decade. They argue that under-regulation introduces a risk that individuals without professional credentials gain employment in translation and interpreting services. For instance, they note that it is possible for interpreters without any formal training to be found in medical or legal environments where an error in translation could have significant repercussions.

3.5 Human Rights Agenda and Irish Sign Language Recognition

The provision of interpreting services – especially state funded interpreting services – is effectively a political act. In many western European countries, the welfare state has taken the economic responsibility for provision of interpreting services, with early moves to do this influenced by a disability model of deafness. We see this in Finland, for example, where a commitment to providing interpreting was legislated for under the Services and Assistance for Disabled Act 1987. In an Irish context, the legislation that serves to underpin equality for deaf citizens includes the Equal Status Acts 2000-2012, the Equality Act 2004, the Health (Amendment) Act 2005 and the Disability Act 2005. There are also a number of regulations that exist, guiding public services vis-à-vis their engagement with clients/customers (SLIS 2016). SLIS (2016) includes the following: the National Disability Authority Code of Practice on Accessibility (2005), the HSE National Consent Policy (2014), the HSE National Guidelines on Accessible Health and Social Care Services (2014, updated 2016), the Central Bank's Consumer Protection Code (2012, revised 2015), and the Department of Social Protection's Customer Charter and Action Plan 2013-15.

From a Deaf community perspective, these documents do not go far enough. In an Irish context, with concepts of "reasonable accommodation" working against the notion of an absolute right to interpreter provision. The cost of interpreter provision is one that impacts on access to events, even those in the public domain, and the vast majority of public sector websites remain inaccessible to the many sign language users who have limited or functional literacy in English (Conama and Grehan 2002, Conroy 2006). Further, many Irish Sign Language users have reported on the barriers they face in accessing appropriate provision in education (Leeson 2012), in healthcare (Leeson et al. 2014) and in accessing legal services (Harold 2015, 2016). Leeson and Phelan (2016)

addressed the reasons why greater regulation of interpreters in legal settings is desirable in light of the transposition of Directive 2010/64/EU into Irish law via SI No. 565/2013 while Leeson et al (2016) have reported on the seeming low level of provision of interpreting in the Irish courts. This is, sadly, not a uniquely Irish story (see Napier and Leeson 2016, and Nicodemus and Metzger (Eds.) (2014) for examples from other jurisdictions).

Given this context, Deaf communities internationally have pushed for legal protection of sign languages as a mechanism to gain better supports for sign language users, seeking to ensure the right to linguistic access and sign language use is protected, and that funding is ring-fenced for research and services to underpin better rates of access and participation (see Wheatley and Pabsch 2012, Timmermans 2005). While the Recognition of Irish Sign Language for the Deaf Community Bill 2013, proposed by Senator Mark Daly, FF, was narrowly defeated in the Seanad with 21 votes to 24[16], in late July 2016, Senator Daly committed to reintroducing the bill, in a bid to "empower the deaf community by placing sign language on a statutory basis"[17]. The Bill was subsequently reintroduced and has currently passed the second stage of scrutiny in the Seanad (19 October 2016[18]) and is due to be brought to Committee stage in Spring 2017, where the detail of the Bill will be scrutinised (Senator Mark Daly, personal communication, October 2016). In advance of the Seanad vote, the Joint Committee on Justice and Equality held a hearing with representation from the Irish Deaf Society. Amongst the recommendations published was this:

> "Of particular importance is a system of registration and regulation of Irish Sign Language interpreters, deaf interpreters and Irish Sign Language teachers, and the provision of interpretation services by public bodies." (2016: 11)[19]

The Bill, as it currently stands, makes reference to registration and regulation of interpreters, though general consensus is that current content requires revision; while the Minister of State at the Departments of Social Protection, Justice & Equality and Health with special responsibility for Disabilities, Finnian McGrath noted:

> "I have to flag a number of questions about specific provisions in the Bill, which I am sure will be examined carefully in the pre-legislative scrutiny process. While the central principle of the Bill is sound, it seems to take a perhaps disproportionate approach to the provision of services for users of Irish Sign Language. Even prior to the publication of this Bill, I had approved a draft of the new national disability inclusion strategy, which we are working on. It proposes the following action for public consultation: "We will propose legislation to ensure that all public bodies provide Irish Sign Language (ISL) users with free … interpretation when availing of their statutory [entitlements]". More work will be needed - and I take on board the Senator's points in the debate today - to tease out the detail of how this will operate but, in principle, we need an approach focused directly on statutory entitlements.
>
> We know from our experience of the Irish language and the Official Languages Act that what is really important is developing the capacity to provide services in the language of the customer's choice and that enacting legislation or a constitutional protection will

16 https://senatormarkdaly.org/2014/01/23/recognition-of-irish-sign-language-bill-defeated-in-the-seanad/

17 https://www.fiannafail.ie/ff-bill-will-give-recognition-to-irish-sign-language-daly/

18 http://www.thejournal.ie/irish-sign-language-law-bill-3035112-Oct2016/

19 http://www.oireachtas.ie/parliament/media/committees/justice/Final-Report-on-Recognition-of-Irish-Sign-Language.pdf

> not resolve the practical service delivery issues that need to be planned for. This matter needs to be examined closely. We need a pragmatic and feasible approach backed up by statutory recognition of the rights of users of Irish Sign Language but also to ensure we can guarantee the service can be delivered in practice. A number of Senators spoke about the importance of delivery and the provision of resources. I got the message.
>
> The following are elements of the Bill at which we need to look. The preambles are not a feature of how we draft primary legislation and do not seem to be necessary. I am not sure anything useful would come from the proposal to impose an obligation on public bodies to develop three-year action plans for Irish Sign Language, as provided for in section 9. The establishment of a new public body to be named the Sign Language Interpreting Service by the Citizens Information Board rather than allowing the board to continue to develop an ISL service, as it has been doing, does not seem to be necessary.
>
> …
>
> Section 29 provides for a sentence of 12 months' imprisonment for either offering interpretation services or teaching Irish Sign Language on a commercial basis without being registered. I accept that there is a need for proper standards, but this approach is unnecessarily punitive and will do nothing to address the real issue - the need to develop the availability of Irish Sign Language interpreters."[20]

Thus, the issue of who regulates interpreting services and how that will play out in practice is a highly relevant concern politically at present, and a topic that SLIS is perfectly positioned to engage with.

The other mechanism that Deaf communities internationally have placed faith in is the United Nations Convention on the Rights of Persons with Disabilities (2006). The United Nations General Assembly established an ad hoc committee to consider proposals for an international treaty on the Rights of Persons with Disabilities in December 2001. The interests of deaf sign language users were represented by the World Federation of the Deaf (WFD), who participated at all levels in the process of drafting the Convention. Deaf people needed to be represented by this particular UN Convention, because Deaf people across the world are still not guaranteed their human rights (Haualand and Allen 2009). Further, there is a clear need for a paradigm shift from the medical model to the Human Rights model of disability (which, we see as including a "linguistic rights" model of deafness) (Napier and Leeson 2016).

The Convention aims to guarantee equal rights for Persons with Disabilities to enjoy physical, social, economic, and cultural rights covering issues related to the environment, health, education, information, and communication. WFD's key goal was to ensure that Deaf people's linguistic rights would be recognised within the Convention. Many rights are mentioned in a general way and these can be interpreted together with those articles where sign languages are explicitly referenced. For example, non-discrimination on the basis of language and linguistic rights is mentioned in many segments of the Convention, including in the preamble and sign languages are mentioned 8 times in 5 different articles:

Article 2 – Definition
Article 9 – Accessibility
Article 21- Freedom of expression and opinion, and access to information
Article 21(e) - Recognizing and promoting the use of signed languages
Article 24.3 (b) – Education
Article 24.3 (c) - Education
Article 24.3 (e) – Education
Article 30: Participation in cultural life, recreation leisure and sport

20 See: https://www.kildarestreet.com/sendebates/?id=2016-10-19a.109&s=speaker%3A3

For our purposes, there are two references which are particularly relevant. Article 9, which focuses on "Accessibility" notes that persons with disabilities shall have the right to "Participation in all the levels of society". This article also emphasises the right to freely access communication and have access to communication and information through intermediaries. Article 9 makes explicit reference to the provision of sign language interpreters: "State parties shall: "Provide forms of live assistance and intermediaries, including guides, readers and professional sign language interpreters, to facilitate accessibility to buildings and other facilities open to the public." (UN 2006)

This reference to "professional sign language interpreters" suggests that States that ratify the convention have responsibilities to promote and develop sign language interpreter training, and by inference, regulate the provision of interpreters; they would also be expected to facilitate interpreter services and to promote access to sign language interpreters (Napier and Leeson 2016).

Par. 21 (e) states that sign languages should be recognized either in legislation or in public policies and programs. This links to the Irish Sign Language Recognition Campaign's work to date, but also seeks to ensure that in the absence of such legislative protections, that sign language users are guaranteed visibility in public policy and that this visibility extends to the provision of information in sign languages and access to services via sign languages. This provision requires appropriately credentialed interpreters (including Deafblind interpreters) and translators.

While Ireland has not yet ratified the UNCRPD, it was ratified by the European Union in 2011[21] and Ireland is due to ratify the convention[22], (and will be the last country in the EU to do so). In the interim, the High Court (M.X. v HSE, 2012) has found that Ireland has obligations with regard to the UNCRPD given our membership of the EU, a territory that has ratified the convention[23]. We have found an insufficient response to the question of state obligation towards Irish Sign Language users' vis-à-vis the UNCRPD in the absence of ratification of the treaty. It is our hope that the government will seek to engage with key stakeholders and provide for a clear strategy for UNCRPD implementation with regard to sign language users. Indeed, we would recommend that SLIS, with key stakeholders, seek to put in place a time line for implementation of strategies and services that are referenced in or transpire from the UNCRPD that relate to sign language users.

21 http://ec.europa.eu/social/main.jsp?catId=1138

22 http://www.irishtimes.com/news/social-affairs/un-convention-on-disabilities-will-be-ratified-says-finian-mcgrath-1.2641487

23 http://www.irishtimes.com/opinion/ireland-must-ratify-un-convention-on-rights-of-people-with-disabilities-1.2157963

3.6 Summary

Thus far, we have considered the historical and educational backdrop to interpreter provision in Ireland over the period 1992-present. We considered the range of educational pathways that have existed and which currently exist for those wishing to enter the field of interpreting. We looked at the cumulative number of trained interpreters in Ireland on the basis of available data and contrasted that with the number of individuals who have presented for Irish Sign Link, and later, Sign Language Interpreter Service assessments over three points in time. Against this backdrop, we considered the temporally shifting demands on interpreter practice in the Irish context, given greater participation by a small percentage of Deaf ISL users in higher education and professional life, and the increasing fragmentation of ISL as a result of mainstreaming. We also considered the policy framework that provides a backdrop to provision of interpreting services. We noted that there are processes in train seeking to secure legal recognition of ISL via the Recognition of Irish Sign Language Bill (2016), which will have consequences for sign language interpreter regulation and service provision. We also noted that Ireland is due to ratify the UNCRPD, and this treaty also has the potential to influence policy interest in sign language interpreting provision and, by extension, regulation. We will now turn to look at the international literature on interpreter certification and/or accreditation. We begin with a short note on testing.

4. Testing

> "It needs to be acknowledged that test developers face additional challenges when designing interpreter and translator tests, as compared to test designers in other more established fields due to a lack of empirically defined and supported models of translator and interpreter competence, and a lack of research into existing tests. The lack of research into accepted models of competence leaves test developers with little more than untested theoretical frameworks or practitioner experience as the basis for test design, including the design of test packages and scoring rubrics. The lack of a body of research into existing tests means that there are not accepted standards for reliability of translator and interpreter tests and no tried and tested methods for undertaking this research." (Hale 2012: 68)

Before we discuss the international literature relating to the certification of interpreters and the accreditation of interpreter education programmes (IEPs), it is worthwhile including a few observations on the issue of testing more generally, including consideration of how these apply to the assessment of interpreters undertaking "high stakes" tests that have professional repercussions for practice, not least, given Hale's reflections, above. We include this section given that many certification systems in place internationally include the testing of individuals – either in parallel with, or in addition to the accreditation of IEPs. Further, given the dearth of empirically-led interpreter testing approaches, it is essential that when testing does occur, the process is as informed by the extensive literature on testing.

An overview of a sample of countries where interpreter testing takes place can be seen in Table 3. This table also shows examples of where accreditation or some other form of recognition of IEPs takes place. Later, we will look at each of these country's systems in a little more detail, but first, we consider principles that underpin testing.

Table 3: Testing of individuals and Accreditation of IEPs

Country	Voluntary/ Statutory Licensing	Accreditation of Courses	No. of IEPs Accredited/ Recognised	Do Interpreters need to undertake testing if they have completed an accredited programme?
Australia	Voluntary testing	Yes	6	No
Austria	Statutory testing for ***untrained*** interpreters	All recipients of a university qualification are obliged to list their academic qualifications with their name	2	No
Belgium- Flanders	*De facto* statutory	*De facto*	3	No
Brazil	Statutory testing for ***untrained*** interpreters	*De facto*	All	No
Canada	Voluntary	Yes	6 current IEPs in Canada but a total of 28 recognised (some IEPs defunct, some outside Canada)	Yes – training is a pre-requisite for testing
Finland	*De facto* - statutory	*De facto*	2	No
Japan	Voluntary	No	N/A	Yes
New Zealand	None	N/A	N/A	N/A
Sweden	Voluntary	No	N/A	N/A
UK	Voluntary	Yes	10	No – but this depends on what level an IEP is mapped at
USA	Voluntary at national level, but licensing is statutorily obligated in several states.	Yes	18	Yes – training is a pre-requisite for testing

The complex task of ensuring competence and quality via a testing process is multi-factorial. Hale (2012: 11) suggests that:

> "Among these are issues relating to pre-requisites to accreditation, test validity and reliability of the testing instruments and assessment models, and post accreditation checks."

4.1 Pre-requisites

Pre-requisites to accreditation applied in many jurisdictions relate to bilingual competence, education and training and specialization and, in some countries, police vetting (e.g. Scotland). That is, there are minimum thresholds in place that must be met before one can put oneself forward as a candidate for a process of certification. For example, in the USA, candidates for the RID's entry level NIC test must hold a bachelor degree in any discipline. In Austria, if a candidate has not completed an undergraduate degree in interpreting (in which instance, they are not required to take the registration test), candidates must have minimally completed a one-year programme of training provided by the registration body before they can sit a test. A pre-testing training requirement is something that has been introduced/ is in the process of being introduced in several jurisdictions in a bid to improve test-taker readiness, and help ensure readiness to take the test (e.g. Australia, Canada).

4.2 Test design and test validity

> "Many test makers acknowledge a responsibility for providing general validity evidence of the instrumental value of the test but very few actually do it" (Messick 1992: 89).

Test design "involves a sort of principled compromise" (McNamara 2000: 27). There are a number of reasons for this:

> "On the one hand, it is desirable to replicate, as far as possible in the test setting, the conditions under which engagement with communicative content is done in the criterion setting, so that inferences from the test performance to likely future performance in the criterion can be as direct as possible. On the other hand, it is necessary to have a procedure that is fair to all candidates, and elicits a scorable performance, even if this means involving the candidates in somewhat artificial behaviour" (ibid.).

In interpreting contexts, we typically find that assessments include role play scenarios as well as recorded data representing source language materials that an interpreter is required to (typically with some degree of preparation) interpret in either consecutive or simultaneous mode (Napier 2008, Leeson 2011, Hale 2012). While authentic, criterion driven tests are desirable, as McNamara also reports, "As assessment becomes more authentic, it also becomes more expensive, complex and potentially unwieldy" (2000: 29). From this stems another important issue – that of validity: if tests cannot be controlled in terms of contextualisation to a greater or lesser degree, then there are issues arising in terms of how valid the test is. The issue of resource limitations is real and one that we must also acknowledge as impacting on what we do when we test.

Proficiency tests applied in certification contexts are concerned with future language use, without reference to the teaching process (in contrast to many tests that arise in educational contexts, which measure achievement of the modular or course-based learning outcomes). Such future language use is considered as the criterion against which proficiency is measured. Performance features relating to aspects of the linguistic environment that stakeholders will encounter are included as test criterion (i.e., for medical settings, can a doctor communicate effectively with a patient who speaks language X?).

Angelelli (2007) outlines the processes involved in creating authentically driven performance features associated with medical interpreting in the test design phase. Working with stakeholders (native speakers of English, Spanish and Hmong, medical practitioners and pharmacists and practicing interpreters), Angelelli's team created authentic, criterion driven test data to assess language proficiency and interpreting readiness of candidates before and on completion of specialist training. She notes that criterion-referenced tests allow testers to "make inferences about (a) how much language ability a test taker has (LP) and (b) how much interpreting ability a test taker possesses (IR), rather than merely how well an individual performs relative to other individuals." (2007:71). McNamara (2000:7) makes the related point that testing is "about making inferences; this essential point is obscured by the fact that some testing procedures, particularly in performance assessment, appear to involve direct observation."

These factors are vitally important in evaluating interpreters where we must differentiate between language proficiency and interpreting competence (See also Pires Pereira and de Azevedo Fronza 2011, for a discussion of how these things are often conflated in assessments of interpreter proficiency). This is why it is so important to separate out the distinction between the criterion (the relevant communicative behaviours in the target setting) from the test. The criterion can be described as an unobserved series of performances subsequent to the actual test. Those future, unobservable performances are in fact the target in proficiency tests. It is the characterisation of the essential features of the criterion that influences the design of the proficiency test (i.e., the real life settings that we aim to simulate in the test will influence the way the test process is structured). In contrast to the criterion, the test itself is a performance or series of performances, which simulates, represents, or is sampled from the criterion. It is only the test itself that is observed. Thus, with proficiency tests, we are making inferences about what a candidate *should or may* be able to do on the basis of our observation of the test situation.

All language testing, which includes the testing of interpreters, links to real-world ability. While materials and tasks included in any kind of language test can be relatively authentic, they can never be 'real'. Test candidates are not 'really' interpreting for a job interview, or at a meeting with the bank manager, and all parties are conscious of the fact that they are participants in a test environment. Leeson (2011) notes that when assessing SLI candidates, we ask questions about capacity to deal with situation x or y in the 'real world'/ in a given specific domain.

A number of other restrictions apply with respect to criterion based testing (or proficiency tests). Limits always apply to the authenticity of tests because of the differences in the conditions under which a test is administered. For example, a candidate may be prepared for interpreting a lecture on a specific issue for a test, but may, in future "real life" situations, not conduct detailed preparation, and the attention given to preparation for the test scenario may inflate their result vis-à-vis future performances. Thus, changing conditions can jeopardise validity, and with it, the generalizability of test results. As McNamara notes:

> "The point is that observation of behaviour as part of the activity of assessment is naturally self-limiting, on logistical grounds if for no other reason … most test situations allow only a very brief period of sampling of candidate behaviour … oral tests may last only a few minutes" (2000: 9).

Thus, most testing situations allow only a brief sampling of candidate performance and behaviour, the test is restricted to what it tells us about candidate performance in the test context, and from this context, we infer behaviours in other more generalised (or specific) settings. Given this, test validation issues also arise. We are obliged to consistently investigate the defensibility of the inferences made on the basis of test performance. We must also bear in mind that the act of observation can impact on behaviour, described as the "Observer's Paradox" (Labov 1969). This applies to test candidates as much as to the subjects of sociolinguistic studies: the very act of observation can change the candidate's normal behaviour, and it is their normal behaviour that we want to see.

The issue of how we judge candidate performances is critical. McNamara suggests that:

> "In judging test performances … we are not interested in the observed instances of actual use for their own sake; if we were, and that is all we were interested in, the sample performance would not be a test. Rather we want to know what the particular performance reveals about the potential for subsequent performances in the criterion situation. We look so to speak underneath or through the test performance to those qualities in it which are indicative of what is held to underlie it." (McNamara 2000: 10)

4.3 The Cycle of Assessment

Testing involves 3 key phases that are cyclical: (1) Background issues, (2) Test Content and Test Method Design, and (3) Review, Validation and Revision. Background issues influence test method and design, and include consideration of the constraints that impact on test design and implementation as well as the financial, physical and human resources that are available for test development and operation. The issue of test security is another essential component: is test content unseen? Partially shared with candidates? Known in advance? In interpreting contexts, clearly we wish to evaluate capacity to handle both prepared and unprepared content, and candidates need to know in advance the nature and calibre of the test they will be expected to undertake. Finally, external factors (e.g. licensing/registration requirements, accreditation of institutions by external parties, etc.) must be considered[24].

The first issue with regard to test content and test methods entails decisions about what goes into the test. This links to how we see language and the use of language in a test situation (i.e., our view on test construct) and how we link test performance to real-world usage of languages in an interpreting context. McNamara (2000) notes that teams undertaking major testing projects may start by defining the test construct. The second issue is that of identifying the test domain. This involves careful sampling from the domain of the test. Here, we must identify the set of tasks or the kinds of behaviours that arise in the criterion setting. This may include introductions, managing turn-taking, ratification behaviours, sociolinguistic norms in a given context (use of names/ titles, maintenance of register across the task, use of domain specific concepts or terminology, or, as in Angelelli's (2007) study, the requirement for potential medical interpreters to demonstrate capacity to interpret across registers, and to bridge perceived gaps in education and world knowledge between medical practitioners and patients.

24 Weir (2005) offers a thorough, evidence-based analysis of language testing and validation issues for those who wish to explore this topic in more detail.

Further issues for consideration are test method and authenticity. Test method includes aspects of test design and scoring and issues of authenticity of the test, which we have mentioned already. Criterion for proficiency tests should be based on job sampling, linked to what interpreters do in practice, but " … test design involves a sort of principled compromise" (McNamara 2000: 27). He says this because:

> "On the one hand, it is desirable to replicate, as far as possible in the test setting, the conditions under which engagement with communicative content is done in the criterion setting, so that inferences from the test performance to likely future performance in the criterion can be as direct as possible. On the other hand, it is necessary to have a procedure that is fair to all candidates, and elicits a scorable performance, even if this means involving the candidates in somewhat artificial behaviour." (Ibid.)

Further, "As assessment becomes more authentic, it also becomes more expensive, complex and potentially unwieldy" (2000: 29). From this stems test validity. If tests cannot be controlled in terms of contextualisation to a greater or lesser degree, then there are issues arising in terms of how valid the test is. Resource limitations are real and impacts on approaches to testing.

Another issue is test specification, namely the set of "rules" for the test, comprising written instructions for implementation. They function to make explicit the design decisions regarding the test and must explicate the test's structure, duration, authenticity, source of testing material, the extent to which authentic materials are altered, response format, test rubric, and scoring system. Test materials are then written to these specifications.

The next stage is trialling the test, which should include taking feedback from test takers, which in turn leads to information gathering regarding modifications to be made to the test before its implementation. This can be difficult to do because of the constraints on time, resources and sample populations that exist, but these processes solidify the validity of a test process. Leeson (2011) notes that given the small community of interpreters and interpreting students internationally, it is no surprise that there is a very limited amount of published data on interpreter assessment for both spoken and signed language interpreting. (See Leeson (2007), and Bartlomiejcyk (2007) for discussion regarding the limited number of empirical studies focused on the assessment of interpreters, especially interpreters in training). A reason for this may include the fact that anonymity of participants may be compromised because of the small pool of interpreting students in many countries. The issue of making available 'mock' examination content and ensuring that students have access to the test specifications prior to the test are hallmarks of university education. This principle is applied in many high stakes testing domains too (e.g., in Canada, AVLIC make sample tests available to candidates).

The issue of test raters is also important. While we tend to think of tests as objective, reliable indicators of ability, raters make subjective judgments too. In a high stakes testing domain like interpreter certification testing, it is imperative that these judgments can be accounted for. Much testing focuses on SLI proficiency in communicative situations, with data marked live or, where recorded, marked *post-hoc*. Ratings awarded to a candidate are not solely a reflection of the candidate's performance, but are also a reflection of the qualities of the person who has judged that performance (Leeson 2011). Following McNamara (2000), we can say that most rating schemes entail the assumption that if rating category labels are clear and explicit, and if raters are trained to interpret and apply these labels as per the intention of the test designers, then an objective rating process is possible. The reality is that rating is an intractably subjective

process, containing a significant degree of chance associated with both the process and the rater. Given this, there are two choices – shy away from direct testing or acknowledge that there is a need for frameworks to be established which facilitate judgment making on the part of raters, facilitating inter-rater reliability. This can entail the establishment of 'cut-off points' in hurdle tests (i.e., establishing the minimum cut-off point for passing on the basis of 'good enough'/ 'not good enough') or employ a gradient continuum of marking (i.e., provide feedback to students in terms of their progress, mapping their performance to institutional marking scales). Crucially, raters must be trained to work with rating scales and understand what it is that they are being asked to mark, and for what purposes. They must have clearly outlined sets of rating criteria that they can return to when determining borderline cases, and understanding of clearly defined outlines of attainment aligned to institutional marking schemes must be central to the process of training.

4.4 Post-certification Revalidation

Post-certification, certified interpreters may be required to complete records demonstrating that they are actively working as interpreters and participating in continuous professional or educational development. In some countries, cycles for (often randomised) post accreditation checks range from 12 month periods (e.g. UK) to four year cycles (USA).

4.5 Summary

In this section, we have considered some of the issues that apply to the development and roll-out of a valid testing cycle as well as pre- and post-certification considerations that may apply. In the next section, we turn to look at systems of certification that have been established around the world, with particular attention given to Australia, the USA and the UK. We also consider accreditation or other forms of recognition of interpreter education programmes (IEPs) as part of national/regional strategies to regulate the interpreting profession.

5. International Review

5.1 Overview

Having looked at the issue of assessment in general terms, we now turn to the core task at hand – a review of international systems for the certification of interpreters and/or accreditation of interpreter education programmes. This desk-based literature review drew on a combination of sources with the particular aim of analysing interpreter registration processes – voluntary and statutory - in place in a range of jurisdictions. We conducted a web-based analysis of relevant organisations pertinent to this area at national and international level, for both signed and spoken language interpreters. We did this because in some countries, the registration process is streamlined, regardless of the modality of languages involved.

Pan-European and international organisational approaches were also reviewed. This allowed us to draw on professional recommendations from organisations like the European Forum of Sign Language Interpreters (efsli), the European Legal Interpreters and Translators Association (EULITA), the World Association of Sign Language Interpreters (WASLI), the World Federation of the Deaf (WFD), the European Network for Public Service Interpreting and Translation, and the International Federation of Translators (FIT).

To provide a broader-based, more nuanced backdrop, we carried out library based research, particularly with regard to literature that describe and evaluate the processes in place (though the latter are very few in number). We also engaged directly with esteemed colleagues from around the world, who have often been heavily involved to the development of national registration and/or accreditation processes in their countries.

A commonly recurring theme across the literature is the rationale for increased regulation (which typically happens in advance of IEPs being established as a mechanism for seeking to assure minimum standards of quality). The literature also discusses the scope of voluntary regulation processes that are in place. Another commonly referenced theme is the absence of statutory regulation for professional interpreters working in public and private services. The goal of regulation, be that voluntary or statutory regulation, is quality assurance regarding interpreting services provided. If a profession falls under statutory registration, the profession is regulated by law. The main purpose is to protect individuals involved in a particular context or setting, for example professionals working in health care or legal settings have to be regulated by law if they want to practice (www.coru.ie). This means that complaints against a practitioner could lead to suspension[25] and ultimately, disbarment. It also serves to prevent unqualified personnel from presenting themselves as professionals in the field. This relates to the issue of protected titles and/or functions that we discussed earlier.

Following Hlavac (2013, p.33), we could add that *'…regulatory standards also perform the function of formalising informal benchmarks of work practice within a profession. In so doing, they raise the profile and standing of that profession through consumers' knowledge that that profession is regulated by standards.'*

25 A current example is the case of Dr. Omar Hassan who was found guilty of misconduct and poor professional performance on multiple grounds by an Irish Medical Council Fitness to Practice Committee and suspended from practice ("Medical Council told Gardaí of threats made by suspended doctor" Irish Times 26 July 2016).

Here, the key terms for us are 'formalising' and 'informal benchmarks of work practice'. While the act of *legally* formalising best practice standards regarding interpreter practice is still rather rare internationally, the informal benchmarking of practice is more widespread, with codification of such work practices written up in the many Codes of Practice and Codes of Ethics available internationally for interpreters, including those available here in Ireland via a number of bodies, including SLIS. There are also codifications of entry level fitness to practice. For example, the European Forum of Sign Language Interpreters (2013a) worked for a two-year period with interpreter educators from across Europe to set out the learning outcomes that new entrants to the field must have successfully completed as part of their training pathway; efsli (2013b) also published an accompanying document on assessment. We note that across Europe, the move has been towards a three-year pathway to bachelor level qualification, with many countries offering a fourth year which is at master degree level (often referred to as the BA-MA system, codified as a result of the Bologna Process) (Leeson 2011, efsli 2013a, b). Such qualifications are often accepted as the entry point to the profession, and in some contexts, external bodies accredit programmes (e.g. the USA's Commission on Collegiate Interpreter Education (CCIE)), which, in some cases, allow graduates who achieve agreed grades, entry to the national register (e.g. UK, Argentina).

In some countries, a bachelor degree is a pre-requisite for presenting for testing (e.g. RID – USA). In the UK, national occupational standards in interpreting are set out by CILT, the National Centre for Languages (2006)[26], and these are currently under review (Alan Peacock, presentation at the ASLI conference, Newcastle, 2 October 2016). As discussed earlier (Section 2.2), the International Standards Organisation published a set of standards for community interpreting, which make explicit reference to sign language interpreting and Deaf interpreters (ISO 2014), and as these are adopted, they too serve as regulatory principles.

Equally, there are legally binding requirements in place in some territories. Statutory registration exists in parts of the USA, for untrained interpreters in Austria and Brazil, and, in a seemingly *de facto* manner in Flanders (Belgium) and Finland where all graduates of recognised interpreter training degree programmes are added to the national register. Further, colleagues in the UK (NRCPD[27]), are currently expressly pursuing statutory registration.

As an example, the state of New Mexico in the USA mandates licensing for interpreting in community settings for interpreters who are already nationally certified by the Registry of Interpreters for the Deaf (RID). These interpreters are then licensed to work in a broad range of settings, excepting court interpreting, which requires further credentialing. They also license interpreters who work in educational settings (for interpreters who hold a nationally-recognized educational interpreting credential - the ED: K-12 credential from RID). They note that this license is valid only for K-12 interpreting but is not appropriate for those working in community educational or post-secondary settings. The state of New Mexico also issues provisional interpreting licenses to interpreters who are working toward RID certification. This license may be held for up to five years and qualifies the interpreter to work in simple educational and community settings. Practicing without a license is a misdemeanour punishable by up to 364 days in jail and/or up to a $1000 fine. New Mexico defines interpreting as any form of facilitating communication in a visual form, regardless of the individual's job title or position description[28]

26 See: http://wiki.settlementatwork.org/uploads/UK-National_Occupational_Standards_for_Interpreting.pdf

27 See: http://www.nrcpd.org.uk/statutory-regulation

28 See: http://www.cdhh.state.nm.us/licensure-information.aspx

Thus, with statutory regulation only professionals who have met the requirements and standards agreed and legislated for can practice. In doing so, employers and companies can check whom they are employing and clients can check who is legally registered (though we note that many voluntary registers also allow for this to occur).

In most countries, it appears that interpreting agencies work with a wide range of self-employed interpreters but not all interpreters are trained, qualified, certified/licensed/ accredited professional interpreters. Indeed, one of the key issues encountered in this literature review was the lack of consistent policy and procedures in place coupled with the absence of quality control mechanisms in place.

While there is almost universal movement towards regulation of interpreting in either a voluntary or statutory capacity, it is interesting that there is scant data that reviews the success of attempts to ensure that only certified interpreters are hired. We concur with Hlavac (2013: 33) who notes that "Within the Translation and Interpreting (T&I) sector cross-nationally, there is great variation in minimum requirements for practice, availability of training facilities and formal bodies that certify practitioners and that monitor and advance T&I practices".

However, there are some countries which have been evaluating interpreter fitness to practice in well thought through processes for some time, which we present here as case studies on which we build our consideration of best practice.

5.2 International Literature Review: Case Studies

In this section, we look at a number of countries that have implemented registration and consider these with regard to a number of metrics including their Deaf sign language using population, availability of interpreter education, status of sign language, presence of professional organisation/s of interpreters, statutory/ voluntary registration and/or licensing and/ or accreditation of programmes. We begin by presenting a snapshot of the system/s applied in each of the countries listed in Table 4. Table 4 presents a summary overview of the key issues that we address. These include the population of the country/region and that of the deaf, sign language using community in that jurisdiction. We list the status of the sign language, and note whether or not interpreter education is available. We note whether there is a voluntary or statutory register in place, if indeed any exists. We also consider the competency level tested (e.g. entry/ specialist skill/ mastery of skill). If known, we include the pre-requisites that apply for testing in that jurisdiction. Where possible, we include figures relating to pass rates for tests and numbers on registers. We also note if there are accreditation processes in place vis-à-vis interpreter education programmes. One thing that we have sought, but have not been able to find, is any empirical analysis of the impact of registers of spoken or sign language interpreters in terms of quality control or professional development processes. However, there is literature that discusses the policy and practical implications arising from the implementation of such measures (e.g. UKCES 2011, Martin 2014).

Country	Population	Pop.Deaf SL Users (approx.)	Status of SL	IEPs	Voluntary/ Statutory Registration	Regiater Holder
Australia	21m	6,500	Recognised as a "community language other than English	Yes	Voluntary	NAATI
Austria	8m	10,000	Constitutional Recognition	Yes	Statutory testing for untrained interpreters	
Belgium/ Flanders	6.5m	6,000	Legal Recognition	Yes	*De facto* statutory	CAB
Brazil	208m	5.8,	Federal Law	Yes	Statutory testing for untrained iterpreters	National Institute of Studies and Educational Research (Anso Teixeira or INEP)
Canada	35m	357,000	No federal recognition. LSQ legally recognised in Ontario only, ASL recognised in some provinces (Manitoba, Alberta and Ontarion)	Yes	Voluntary	AVLIC
Finland	5.4m	5,000				
Japan	127m	320,000				
New Zealand	4m	7,700				
Sweden	9.8m	10,000	Yes	Yes	Vontary	The Swedish National Juridical Board for Public Lands and Funds
UK	65m	70,000	Yes - legal recognition in Scotland, and with some recognition in the rest of the UK	Yes	Voluntary	NRCPD
USA	324m	2m	Varies from state to state; also not protectiones offered via the Americans with Disabilities Act 1990	Yes	Voluntary at national level, but licensing is statutorily obligated in several states.	RID (but from 2016, administration of testing shifts to CASLI

Notes: figures regarding number of deaf sign language useres are indicative, based on published literature and Deaf organisation figures. Figures for numbers of certified interpreters are indicative, but, as many authors note, the number of certified and/or practicing interpreters is difficult to confirm (e.g. Takada and Koide 2009).

	Levels of Competency Assessed	Pre requisites for testing	Pass Rate	No of Interpreter on Register	Accreditation/ Recognition of IEPs	No. of IEPs Accredited/ Recognised
	Professional Paraprofessional Recognition-DIs	Yes	10-15%	1009 Auslan/ Eng 18 Recognised DIs	Yes	6
	Sign Language Interpreting - GGSDV Certified Legal Interpreters - The Austrian Association of Certified Court Interpreters	Yes	c. 60%	70 (2009) - no updated figure available.	All recipients of a university qualification are obliged to list their academic qualifications with their name	2
	Graduation from an interpreter education programme - no testing in place	N/A	N/A	C 185 by c.20-25 working as full time interpreters	*De facto*	3
	Generic	Unknown	Unknown		*De facto*	All
	Advanced competency	Yes	c. 20%	65	Yes	28 - some outside Canada. No. of courses offered in Cananda is 6.
		Yes	Unknown	c. 100	No	N/A
	Registered Trainee	Yes	Unknown	834	Yes	10
	CDI-Knowledge CDI-Performance NIC-Knowledge NIC-Performance SCL: Knowledge SCL:Performance	Yes	49% 69% 89% 19% 69% 42%	10,050	Yes	18

5.2.1 Austria

> "Local authorities in charge of interpreter facilitation can only commission interpreters who have passed the accreditation examination" (Grbic 2009: 7) [or successfully completed a recognised IEP].

Austria is a country of 8.4 million people and there are an estimated 6,500 Deaf, sign language users (Austrian Association of the Deaf 2011). Austrian Sign Language (ÖGS) is constitutionally recognised (Grbic 2009). University-based interpreter education has been offered since 1990 and the Austrian Association of Sign Language Interpreters (ÖGSDV) was founded in 1998 by the first graduates of the Department of Translation Studies at the University of Graz (ITAT) training programme (Grbic 2009, Keckeis et al 1998).

ÖGSDV offers accreditation examinations ("the occupational aptitude test") on a bi-annual basis, but interpreters who have completed a (university-based) training programme do not have to take this test (Grbic, Personal Communication, 1 August 2016). Thus, trained interpreters are not necessarily members of the ÖGSDV, and as a result may not be listed, as ÖGSDV only provides the list of its own members[29].

The examination board comprises representatives from ÖGSDV (2), regional Deaf organisations (2), and a representative of ITAT (1). The Austrian Ministry of Social Affairs mandates that local authorities can only commission interpreters who have successfully completed these examinations. Testing comprises written and performance components: (i) a written essay on sign language interpreting, (ii) an analysis of an interpreting event, (iii) a written test on German grammar and stylistics, interpreting studies and professional matters, Deaf studies and institutions in Austria. The performance component includes 4 parts: (i) simultaneous interpreting ÖGS-German, (ii) simultaneous interpreting German-ÖGS, (iii) dialogue interpreting and (iv) an analysis of own performance by the candidate.

Since 2014, Deaf Interpreters have also been tested by ÖGSDV. Some parts of the oral exam are slightly different (the written component is identical): deaf candidates use text-prompter as their source for interpreting into ÖGS (while hearing candidates interpret a live speech from German to ÖGS). DI candidates must complete an extra sight interpreting segment and translate a short piece of video from ÖGS into German (whereas hearing candidates have to interpret a monologic text into German). Both deaf and hearing candidates have to interpret a role play (the criterion is one associated with a community setting) and are required to reflect analytically on their performances (Grbic, Personal Communication, 1 August 2016).

Grbic (2009) reports that between 1998 and 2007, 105 candidates presented for the test, of whom 65 passed[30]. Twenty-two candidates took the test more than once. Grbic suggests that the high fail rate (45%) can be accounted for on the basis that failed candidates had not had any formal training, had poor ÖGS skills, poor command of German and/or exhibited inappropriate behaviour in role-plays.

Since 2008, the occupational aptitude test has only been open to those who have (minimally) completed a one-year preparation course offered by the ÖGSDV or completed the 5-year BA-MA programme at the University of Graz

29 See: See: http://www.oegsdv.at/dolmetschanfrage/

30 No up to date pass rate details are currently available.

or the 3-year programme at GESDO (Linz). Since implementation of the requirement that untrained test candidates undertake the preparatory course offered by the ÖGSDV, the pass rate for test-takers has increased (Grbic 2009).

Interpreters in Austria can also seek certification with the Austrian Association of Certified Court Interpreters. To secure Court Interpreting certification, candidates must have either (i) graduated from a university training programme and have at least two years of professional experience or (ii) if a non-graduate, provide evidence of at least five years of professional experience. Certification is valid for a three-year cycle and renewal occurs where interpreters can demonstrate evidence of continued employment in the field (Austrian Association of Certified Court Interpreters[31], Hale 2012).

Key issues:

Austrian Sign Language has formal recognition in the Austrian Constitution.

Membership of the Austrian Association of Sign Language Interpreters (ÖGSDV) register is a requirement to work for government bodies.

Test seeks to evaluate competence in both working languages and pre-testing minimum requirements are in place. Untrained interpreters are obligated to take the test; those with accredited university training are not obliged to take the test.

31 See: http://www.gerichtsdolmetscher.at

5.2.2 Belgium – Flanders

"Although today a lot of the work of Flemish Sign Language interpreters is in education (typically at secondary and to a lesser degree at tertiary level), interpreters have not received much in the way of specialist training to prepare them for interpreting in these (often specialist) domains as training in Flanders focuses mostly on interpreting for adult clients in private or work-related settings." Heyerick and Vermeerbergen (2012: no page numbers available)

Belgium is a multilingual country organised into three language communities: Flemish-speaking, French-speaking and German-speaking (Wheatley and Pabsch 2012). Both Flemish Sign Language and Belgian French Sign Language are legally recognised (ibid.). Flanders has a population of 6.5m people, and there are an estimated 6,000 deaf Flemish Sign Language (VGT) in the region. Heyerick and Vermeerbergen (2012) report that Flemish Deaf organizations began calling for interpreter services in the 1970's. Due to the lack of interpreter training programmes and the lack of available interpreters (often family members), such services could not be provided. In 1981, the Flemish Deaf Association, Fevlado, initiated the foundation of the first officially recognized "interpreter for the deaf" training. The first qualified interpreters in Flanders graduated three years later, in 1984. In 1983, Fevlado established an association for interpreters, the *Beroepsvereniging voor Doventolken* (Association of Interpreters for the Deaf). Newly graduated interpreters could become members of this organisation. This also allowed Fevlado to track graduates over time via the *Beroepsvereniging voor Doventolken*.

Heyerick and Vermeerbergen (ibid.) report that following the establishment of the interpreter training programme, it became clear that it would not be possible to establish a professional network of interpreters without governmental involvement. Fevlado negotiated with the government on this matter and, this resulted in the foundation of the non-profit organization 'Vlaams Communicatie Assistentie Bureau voor Doven' or CAB ('Flemish Communication Assistance Agency for the Deaf') in 1991. One of their first accomplishments was to incorporate as many interpreter graduates from both existing programmes (i.e. Ghent and Mechelen) as possible within one national network. Today, graduates of Flemish interpreting programmes (KU Leuven in Antwerp, Ghent and Mechelen) are recruited to work via CAB. Graduation from the programme is considered as capacity to undertake the work (Professor Myriam Vermeerbergen, Personal Communication, 5 August 2016). CAB interpreters undertake state-funded interpreting in employment and educational settings and other public service contexts. While no certification of VGT interpreters occurs in Belgium, recently, KU Leuven has established a Masters in Legal Translation and Interpreting that is open to VGT interpreters.

Key issues:

Flemish Sign Language has formal recognition (via decree, that is, legislation passed in the Flemish parliament).

Interpreters work via CAB, the state funded interpreting referral agency. This agency was founded following lobbying by the Flemish Deaf Association, FEVLADO.

Graduates from recognised programmes work with CAB.

No testing process is in place: completion of a CAB recognised IEP is required.

5.2.3 Brazil

"Nothing prevents the inclusion of a language assessment as one of the stages of a professional certification, but this must occur along with evaluation of how candidates meet the threshold in required theoretical and practical skills and knowledge, the level of formal education completed (a requisite level of study is required) and their professional experience (practice in the specific area)" (Pereira 2008: 83; translated from Portuguese by Maria Cristina Pires Pereira).

Brazil has a population of 208m people. There are an estimated 5.8m deaf sign language users in Brazil. Brazilian Sign Language (Libras) was recognised as the official language of the Brazilian Deaf community in 2002 (Law 10.436/2002). In the 1970s, interpreters were typically volunteers, but over time, given increasing participation in political, social and educational spheres, coupled with the evolution of a national association of sign language interpreters in the late 1980s under the auspices of the National Federation of Education and

Integration of the Deaf (FENEIS), the position of the Brazilian Deaf community, their language, and interpreters has shifted (Müller de Quadros and Stumpf 2009).

Pires Pereira and De Azevedo Fronza (2011) note that a National Certificate Exam for Brazilian Sign Language Proficiency for signed language teachers and interpreters was established in 2006. The goal of this test is to assess Libras competency for signed language teachers and for interpreters of Libras/Portuguese. The assessment has its basis in a government law - Decree 5626 (2005). The assessment also relates to Article 18 of Law 10098 (2000), which requires that anyone who wishes to work as a signed language teacher or interpreter must take the Prolibras test. The Prolibras test emerged as a response on the part of the Ministry of Education to demands to certify signed language interpreters who were already working or applying for jobs in educational institutions as sign language interpreters (Müller de Quadros and Stumpf 2009, Pires Pereira and De Azevedo Fronza 2011). In 2006, the Prolibras exam was implemented by the National Institute of Studies and Educational Research (Aníso Teixeira or INEP). The goal of the test is to map proficiency in Libras, and it has come to function as a *de facto* register for sign language teachers and translators/interpreters, particularly those who have not had any formal interpreter training.

The Prolibras test was established as a temporary solution (Pires Pereira and De Azevedo Fronza 2011): it has a 10-year life span and beyond this period it is expected that those wishing to be interpreters will undertake formal training. In Brazil, undergraduate training for interpreters is a recent phenomenon, with courses offered by Universidade Federal de Santa Catarina and Universidade Metodista de Piracicaba since 2009 (Müller de Quadros and Stumpf 2009). In the interim, Polibras certification functions as a means of demonstrating fitness to practice on the part of a professional interpreter. Further, no specialist legal/medical interpreter testing is in place in Brazil.

However, the Prolibras test has been criticised: Pires Pereira and De Azevedo Fronza (2011:38) note that "it is erroneous to suggest that a test of language proficiency equates with competence to teach or interpret." They note that *language proficiency* is typically conflated with *interpreting proficiency* in the field of sign language interpreting, with the result that whoever demonstrates sign language proficiency is assumed to be a good interpreter. The test sets out to evaluate: (a) fluency, (b) lesson planning, (c) contextualization of subject matter (signs, fingerspelling use and characteristics of people, animals and things, etc.), (d) adequate use of the 15 minutes of lesson time, and (e) metalinguistic knowledge (types of sentences in Libras, formation of plural marking, quantifiers, etc.).

Given this, Pires Pereira and De Azevedo Fronza argue that

> "…the Prolibras proficiency test is based on a false understanding of the kinds of language proficiency that are required to teach Libras on the one hand, and the interpreting competencies required to interpret or translate on the other. … The question of whether a language proficiency assessment should be a prerequisite for practice as an interpreter is also an issue for consideration." (ibid.)

They go on to analyse the Prolibras test and compare it with the internationally recognised Sign Language Proficiency Interview (SLPI), which was developed for American Sign Language, and subsequently developed for other languages, including Sign Language of the Netherlands (van den Broek et al. 2015). On the basis of this analysis, Pires Pereira and De Azevedo Fronza argue that Prolibras functions primarily as a professional certification test that examines the didactic competence of Libras teachers, and does not serve as a mechanism for linguistic evaluation. Given this, they suggest that Brazil has no consensus regarding entry-level 'fitness to practise' evaluation of sign language interpreters (i.e. a high-stakes assessment to look at whether a candidate meets the threshold for working in the field as a licensed practitioner).

Key issues:

Libras has legal recognition in Brazil and the Prolibras test is legally mandated (i.e. it is referenced in law).

The Prolibras test is run by the National Institute of Studies and Educational Research (Aníso Teixeira or INEP), authorised by the Ministry for Education.

Successful completion of the Prolibras test is a requirement for interpreters who have not completed university level training. Those completing university training are not obliged to take the test.

Test validity has been questioned: Test seeks to evaluate competence in Libras and in skills associated with the teaching of Libras

The Prolibras test is considered an interim measure – the goal is to phase out testing by circa 2016-17, as graduates from IEPs become the norm.

5.2.4 Canada

> *'…there is no legal requirement for translators/interpreters to be certified. The titles of…'certified interpreter' are granted by the provincial regulatory bodies for these professions'* **(AVLIC 2014).**

Canada is a country of 35m people. There are an estimated 357,000 Deaf sign language users [32], although there are no reliable statistics available regarding what percentage are users of American Sign Language (ASL), Langue des Signes Quebequoise (LSQ) or Maritime Sign Language (MSL) respectively (Malcolm and Howard 2009). LSQ is legally recognised in the province of Ontario while ASL is recognised in a number of provinces (Ontario, Alberta and Manitoba) (e.g. see Parisot and Rinfret 2012), and the Canadian Association of the Deaf is seeking federal recognition of both ASL and LSQ. At present, no certification system is currently in place for LSQ/French interpreters (Malcom and Howard 2009). Given this, our focus is on the certification of interpreters who have ASL as a working language, and who present to the Association of Visual Language Interpreters of Canada (AVLIC) for evaluation.

In Canada, the profession of sign language interpreters is neither nationally licensed nor is there statutory regulation in place regarding the profession of sign language interpreting. Instead, AVLIC, the national association representing sign language interpreters in Canada, certifies American Sign Language (ASL)/English interpreters via their (voluntary) Canadian Evaluation System (CES), a system established in the late 1980s and rolled out for the first time in 1990 (Russell and Malcolm 2009).

The Canadian Evaluation System (CES) certification is only available to AVLIC members. Members who have successfully completed the CES process are awarded the Certificate of Interpretation (COI). All members of AVLIC have graduated from a recognized ASL-English Interpreter Education Program and graduates of Canadian IEPs receive a diploma and/or degree level credentials, depending on the institution. Prospective ASL-English members of AVLIC must be a graduate of one of the 28 institutions recognised, some of which are outside Canada. There are 6 interpreter education programmes in Canada recognised by AVLIC[33], though AVLIC does not directly accredit IEPs.

The AVLIC Canadian Evaluation System (CES) was established in part, as a response to the fact that Canadian interpreters were seeking certification from the Register of Interpreters of the Deaf in the USA, given the absence of any systematic certification process in Canada. There was also a need for a system of evaluation that reflected Canadian content, and which represented Deaf Canadians within the testing system (Russell and Malcolm 2009). One of the hallmarks of the AVLIC CES is the involvement of representatives from the Canadian Association of the Deaf (CAD) and the Canadian Cultural Society of the Deaf (CSSD) since its inception. The goal of the CES is "to accredit interpreters who demonstrate competencies that reflect the diverse communication preferences of Deaf and hearing Canadians."[34]

The original two-part test (comprising a Written Test of Knowledge (WTK) and a Test of Interpretation (TOI)) have subsequently been revised (2000-1, 2002-3, 2004 (Russell and Malcolm 2009), and is currently in review again (AVLIC 2015). Russell and Malcolm (2009: 348-350) present a detailed overview of decisions taken in terms of changes made to the testing protocol in the early to mid-2000s. One of these included the decision to *not* include portfolio

32 See: http://cad.ca/issues-positions/statistics-on-deaf-canadians/

33 http://www.avlic.ca/about/ieps

34 http://www.avlic.ca/ces

assessments for reasons of efficiency and cost (they are time consuming to prepare and assess), reliability vis-à-vis work samples, the fact that the CES would still need a separate standardised test to remain in place in order to address reliability concerns, and because of the limited literature available to underpin the use of portfolios as certification mechanisms. Further, interpreters had raised concerns about the challenges to creating work samples from medical, legal or mental health settings for inclusion in portfolios. Drawing on the work of Ingersoll and Scannell (2002), Russell and Malcolm (ibid.:350) note that:

> "…portfolios are not assessments, but are instead collections of candidate artefacts that present examples of what the candidate can do. The contents need to be evaluated individually as part of the portfolio process and therefore need to meet psychometric standards of validity, reliability, fairness, and the absence of bias. These standards, along with US federal law, form the cornerstone for legal challenges to decisions when students are denied a diploma or a license based on the results of the assessment. If an organisation cannot demonstrate these standards, a court decision against the organisation can result in financial damages and damages to the institution's reputation."

Given this, portfolio-driven evaluation does not currently form part of the AVLIC certification system. We note, however, that portfolio-driven documentation (i.e. listing of evidence) underpins the professional development requirements for maintenance of registration in Canada and in many other jurisdictions. With regard to testing, however, at present, the following 4 step process is in place in Canada:

- **Written Test of Knowledge (WTK).** This includes 73 multiple choice questions which aim to ensure that candidates have appropriate knowledge of the field of ASL-English interpretation. Successful completion of the WTK is required in order to progress to the TOI phase. The test is offered four times a year and student members of AVLIC can apply when they are in their final semester of their programme of study.
- **Test of Interpretation (TOI) Preparation Workshops.** Candidates are required to complete two workshops that emphasise discourse analysis strategies when working with narrative and dialogic segments, which are assessed in the test. The Interpretation of Narratives workshop is a two-day training event, while the Interpretation of Interactive Interviews takes 1.5 days. Candidates must complete required reading in advance of the training session and must prepare a pre-workshop taping session that is collected for evaluative purposes. Pre-workshop video samples are fashioned after the actual Test of Interpretation (Phase three) materials. Interpreted samples are reviewed by two specialists and the interpreted sample is returned to candidates during the workshop, facilitating candidates to focus on areas that have been identified to them. Further, the facilitator takes time to offers suggestions on where to access resources. A Test Taking Skills workbook is provided to candidates along with a "helpful hints" for passing the Test of Interpretation.
- **Test of Interpreting (TOI).** This phase relates to evaluation of interpreting performance. Data used in the TOI reflects content from presenters from across Canada, to reflect the linguistic diversity found across the country. Topics covered include issues such

as human rights and access, language and literacy issues, among others (Russell and Malcolm 2009). Candidates are required to interpret a fifteen-minute narrative from ASL to English, a fifteen-minute narrative from English to ASL, and two interactive segments which they select from three possible topics. Candidates can interpret the segments in any order they choose, though the narratives must be interpreted as a unit. Candidates can access other presentations given by the same narrative presenters in advance of the test in order to familiarize themselves with speakers, simulating real world preparation that might occur. Candidates also receive outlines of the narrative content that they will interpret to facilitate them in preparing for the test. For interactive test components, the candidates must rely on discourse strategies such as their understanding of adjacent pairs, and their own real-life experiences in similar settings to understand the goals of the participants. Candidates can take rest breaks totalling no more than 30 minutes across segments. They are also allowed to pause each segment or rewind to the beginning of an utterance, to a maximum of four times per segment in a bid to mirror real-world interpreting situations where an interpreter can request that a speaker pause or repeat a concept. Candidates are also permitted to submit a video tape of recorded work (ASL>Eng, Eng>ASL, no more than 15 minutes in duration, of work completed in the six-month period prior to the TOI) that can be considered by raters as supplemental evidence of successful prior performance. Such content must be in consultative to formal register and detail regarding the context and audience must also be submitted (Russell and Malcolm, ibid.). Successful completion of this phase of testing leads to the award of the Certificate of Interpretation (COI)[35].

- **Certificate Maintenance Programme.** This is considered the final phase of the certification model. Certified members must uphold the AVLIC Code of Ethics and Guidelines for Professional Conduct. They must also hold active membership of the organization. COI interpreters are required to document their professional development activities on a three-year cycle. Certified interpreters must also document their CPD when renewing their annual AVLIC membership (Russell and Malcolm (ibid.).

The pass rate for the COI performance exam is just over 20% (Malcolm and Howard 2009). At present, AVLIC lists 65 interpreters who hold the COI. This suggests that the test is not considered as a marker of entry level competence (unlike those in place in the USA and the UK, for example), but rather indicates a mastery of performance at a very high level. Indeed, Malcolm and Howard (2009: 249) note that "the test is considered to measure a high standard of ability which is needed to meet the needs of the diverse deaf population across Canada, some of whom work in high profile professions such as educational administration, law, politics, and medicine, among others."

Russell and Malcolm (2009) note that there have been some discussions in Canada regarding the need for a separate testing body, comparable to systems in place for teachers. They argue that given the small numbers in the interpreting profession, such an approach is not feasible at this time. They suggest that ongoing membership of a professional organization like AVLIC is one way of demonstrating commitment to professional growth, as does abiding to professional codes of conduct. They also note that a dispute resolutions process is in place, guided by formal processes.

Another issue that is not addressed in the published literature on assessment protocols in Canada is the certification of Deaf Interpreters. Russell (in press) points out that Deaf interpreters have worked for the past 30 years in Canada across a range of settings, but the training path to become a Deaf interpreter has remained varied and inconsistent (See also Boudreault, 2005;

35 http://www.avlic.ca/about/ieps

Forestal, 2005; Cokely, 2005; Stone, 2005, 2009; Forestal, 2014). She notes that as the profession grew and changed during the 1970's and early 1980's some took the Registry of Interpreters for the Deaf (RID) evaluation workshops and then sat for the "Reverse Skills Certificate" exam, which saw several of them being granted the first RID Certification aimed at DIs. Some DIs took workshops that were offered to "Deaf Intermediary Interpreters", as they were known at the time. Russell points out that it was a decade later when the first Deaf Canadian enrolled in a full-time post-secondary IEP, and in the intervening years, only four DIs have graduated from a post-secondary interpreter program. Instead, Russell notes that the vast majority of those working as DIs in Canada meet the membership criteria of the Association of Visual Language Interpreters of Canada (AVLIC) by demonstrating work experience and a certain number of hours of professional development related to Deaf interpreting (Personal communication, Nigel Howard, 1 May 2015; AVLIC Position Paper on Deaf Interpreting, 2015[36]).

This lines up with the current AVLIC advice to first time prospective DI members. They note that "Due to the absence of Deaf Interpreter Education Programs, Active Deaf interpreters, on the initial application year only, must submit documentation to the Administrative Manager (which will also be reviewed by the AVLIC Board)" [37] but, given present testing protocols in place, Deaf interpreters cannot secure a COI (Debra Russell, personal communication 12 September 2016).

AVLIC is currently in process with a review of their test of interpretation rating system[38].

Key issues:

ASL and LSQ are legally recognised in some jurisdictions, but federal recognition is sought.

The COI evolved in response to the need to offer testing pathways for registration that reflected the Canadian context, as increasingly, Canadian ASL/English interpreters were seeking registration in the USA with RID.

Interpreters are not obligated to complete the COI. It is a voluntary register

Only AVLIC members with ASL as a working language can take the COI.

Pre-requisites to performance testing are in place including the requirement that one has successfully completed an accredited training programme and successfully completed the Written Test of Knowledge (WTK).

The COI is considered to be a reliable assessment of high level interpreting ability: it is not considered an entry-level test of competence.

No specialist testing (legal/medical) is in place.

While DIs can become members of AVLIC, they cannot secure COI certification given the current testing pathways in place.

Continuous Professional Development activity is obligatory for maintenance of certification.

36 http://www.avlic.ca/sites/default/files/docs/2015-06_AVLIC_Official_Postion-Deaf_Interpreter.pdf
37 http://www.avlic.ca/node/647#Not-meet-criteria?
38 http://www.avlic.ca/sites/default/files/images/2016-05-16%20RFP%20No%2010008%20-%20CES%20TOI%20Rating-2.pdf

5.2.5 Finland

> "…rights for persons using sign language and of a person's need for interpretation or translation aid owing to a disability shall be guaranteed by the Act" (Constitution of Finland 1999; translation in Nisula and Manunen 2009: 18-19)

Finland is a country with a population of 5.4 million people and an estimated 5,000 Finnish Sign Language users (Jokinen 2000). A further estimated 150 deaf people are users of Finnish-Swedish Sign Language (Nisula and Manunen 2009). In 1995, the Finnish Constitution was amended to provide legal protection for sign language users (Lappi 2000). However, there has been legal reference to the provision of sign language interpreting in place since 1979 (581/79), and since this time, interpreting services have been financed by the Finnish state (Services and Assistance for Disabled Act 1987, Nisula and Manunen 2009).

Interpreter education in Finland has changed significantly over the years: in 1962, the Finnish Association of the Deaf ran a week-end long training programme, but over time, education formalised and today, 4 year IEPs are offered in two universities of applied sciences – Humak and Diak. In their final year of education, Finnish interpreting students must select a specialisation: interpreting and translation; Finnish Sign Language, interpreting with deaf-blind and deafened people, and the pedagogy of signed supported speech (Nisula and Manunen 2009).

In Finland, a cooperative commission called *Tulkkitoiminnan yhteisty***ö***ryhm***ä** exists with the goal of improving sign language interpreting services. The Commission comprises representatives from the Finnish Association of the Deaf, the Finnish Federation of the Hard of Hearing, the Finnish Deaf-Blind Association, the Finnish Association of Sign Language Interpreters, the Finnish Association of Parents of Deaf and Hard of Hearing Children (KLVL), the Service Foundation for the Deaf, and representatives of sign language interpreter training programmes (Tulkit). One of their functions is to hold and update a register of interpreters who have graduated from IEPs. Any interpreter – Deaf or hearing - who has graduated from a recognised IEP in Finland is deemed qualified and registered. The onus for adding newly qualified interpreters to the register lies with the IEP; the universities of applied sciences report lists of new graduates to the register. For their part, newly registered interpreters must pledge to adhere to the Commission's professional rules. Only interpreters on the register can be booked by the Finnish public services (Dr. Christopher Stone, Personal Communication, July 2016).

Thus, we can say that in Finland, there is a *de facto* statutory register: one must be on the register to work for the state, which funds 180-360 hours of interpreting for each deaf sign language user in Finland, and to become a member of that register, one must have completed a recognised 4-year IEP (Nisula and Manunen 2009).

Key issues:

Finnish Sign Language has formal recognition in the Finnish constitution.

Interpreting is funded by the welfare state.

Graduates of recognised 4-year IEPs – Deaf and hearing - are automatically added to the *Tulkkitoiminnan yhteistyöryhmä* register of interpreters.

5.2.6 Japan

> "Sign language interpreters… are trained as part of social welfare programs. They are seen more as social welfare workers than language interpreters. Deaf people are recognised more for their disability than as language users." (Takada and Koide 2009: 193).

Japan is a nation of 127 million people, and there are an estimated 64,000 Japanese Sign Language users (Ministry of Health, Labour and Welfare 2008, George 2011). Japanese Sign Language users are referenced in several laws, including the Act for Eliminating Discrimination Against Persons with Disabilities and the Amended Act on Promotion for Disabled Persons' Employment, both of which took force from April 1st, 2016[39] However, it is unclear whether Japanese Sign Language is officially recognized as a language in its own right.

While calls for Japanese Sign Language interpreter education, and state funding of interpreting services began after World War II, it was not until 1970 that a shift towards state funded training began for "sign language volunteers". In 2001, curriculum and testing systems were developed for each of the courses offered (ranging from 90 hours - 4 years in duration) (Takada and Koide 2009). Pass rates for some of the courses run around 30% (ibid.). In 1989, the National Sign Language Interpreters Certification system was established. It is a voluntary regulation system which secured approval from the Minister of Welfare and Labour. While testing was variable across the country in the early days of the certification process, the establishment of the National Sign Language Research Centre led a unification drive for the testing process in 2001. The certification examination has four components:

(1) Written examination testing basis knowledge required for sign language interpreting activities

(2) Written examination testing knowledge of Japanese

(3) Interpreting skills in a variety of settings [detail unavailable]

(4) Ability to summarise signed speeches in spoken Japanese.

Takada and Koide (ibid.) report that between 2001 and 2008, more than 1324 people had successfully passed this examination and some 85% of members of the Japanese Association of Sign Language Interpreters are certified. It is unknown what processes are in place (if any) to support Deaf Interpreters who wish to train.

While information on the Japanese context is pretty sparse, we include it here as a reference to a non-English speaking Asia-specific region. We also note that the lack of detailed information is indicative of information available about occupational regulation in many countries.

Key issues:

Sign language interpreting is a developing profession; training for interpreters is highly variable.

Japanese Sign Language is referenced in some laws, but no recognition of the language itself seems to be in place.

A voluntary National Sign Language Interpreters Certification system is in place, with support from the Minister of Welfare and Labour. Certification is handled by the National Sign Language Research Centre.

39 http://www.jfd.or.jp/en/2016/04/18/pid1703 [In International Sign]

5.2.7 Sweden

> *"Evidence of authorisation is not usually asked for since the interpreter has passed an examination from a 4-year programme, but in future it might be desirable if the state authorises all interpreters"* **(Hein 2009: 126).**

Swedish Sign Language was officially recognised as the first language of deaf people in 1981 (Hein 2009), of whom there are an estimated 10,000 according to the Swedish Association of the Deaf (SDR). Several laws are also in place to ensure provision of interpreters where a person does not speak Swedish or is hearing/speech impaired – indeed, the Swedish parliament decreed the right to free sign language interpreting services in 1968 (Hein 2009).

This led to the establishment of the first interpreter training course (6 weeks duration) in 1969 and the establishment of the Swedish Association of Sign Language Interpreters (STTF) in the same year. By 1976, guidelines for the national interpreting service's full-time interpreters were published by the National Swedish Board of Health and Welfare, setting the scene for parliamentary recognition of the bilingual status of (Swedish/Swedish Sign Language) Swedish Deaf people in 1981 (Hein, ibid.). However, it wasn't until 1996 that the first 4-year interpreter training programme at Folk High School level (vocational educational pathway) was established in Sweden, incorporating training in deaf-blind interpreting in the curriculum. In the past five years, Stockholm University has established a 3-year Bachelor in Swedish Sign Language/ English interpreting run under the auspices of the Institute of Translating and Interpreting, bringing the educational pathway for spoken and signed language interpreters closer together. This, in part, also reflects the increased demand for interpreters to work in higher education and work with increasing numbers of Swedish Deaf people who have completed higher education and are entering the labour market as professionals. Hein (2009) reports that this shift led to a governmental commission determining that Swedish Sign Language interpreters be "authorised" (or certified) in 2002, leading to the implementation of testing of Swedish Sign Language interpreters in 2004.

Interpreters are not obligated to undertake these certification tests (or, in the Swedish context, "authorisation tests" (Hein, ibid., Idh 1997). Rather, a voluntary system is in place for both spoken and signed language interpreters, run by the Swedish National Juridical Board for Public Lands and Funds.

For those who do select to undertake certification testing, a number of pre-certification requirements are in place: (i) the candidate must be 18 years or over; (ii) they must live in a country within the European Economic Space; (iii) they must have an irreproachable background; and (iv) they must pass two examinations – one written and one oral. They must successfully complete the written test before they can proceed to the oral test. The written test is concerned with life in Sweden and Swedish institutions. It also contains a terminology test – candidates must translate 200 items from Swedish to their target language. Having successfully completed this part, candidates are invited to take the oral examination several months later. This involves completing the following components: (i) two to four role plays; (ii) questions relating to interpreting techniques and ethical practice; and (iii) occasionally, additional questions relating to the written test (Hein, ibid.). Hein notes that 'The authorisation is regarded as a complement for those who have been actively working in the field for many years but have not had formal training, do not have course certificates, or have graduated from interpreter programs. Many interpreting agencies, however, offer all employed interpreters the opportunity to become authorised regardless of whether or not they have just finished their interpreter training". (2009: 142).

Most Swedish Sign Language interpreters secure employment on completing their interpreter education programme – often full-time employment in one of the country's 24

county councils (Hein, ibid.). This is because the Swedish County Councils have had responsibility for organising interpreting systems since 1994.

By 2009, Sweden had approximately 500 interpreters, with a projected 60 graduates per annum, suggesting 360 graduates for the academic years 2009-10 to 2015-16, leading to an estimated 860 SSL/Swedish interpreters in Sweden today. In 2009, some 70 interpreters had completed the 'authorisation tests'. In seeking to update these figures, Professor Anna-Lena Nilsson (Personal Communication, 31 July 2016) checked the Swedish database, but noted a number of challenges:

- Individuals now seem to be listed on the basis of having completed training but who have not passed the authorization test. Individuals also seem to be registered in accordance with the type of training they have completed (there are filters in place that relate to this). She adds that she doesn't know what happens for interpreters who have completed several kinds of training.
- Another issue is that not everybody is visible on the web page as the register only lists interpreters who have given permission for their names to be published. The website seems to be constructed to help people find an interpreter for a specific language in a specific part of the country. This renders attempts to try to find all interpreters in Sweden for a specific language unworkable – that is, it proved impossible to determine how many authorized SSL/Swedish interpreters there are in 2016[40].

She notes that while a specialisation for medical interpreters was previously listed on the site, this is not currently available. Further, she notes that the potential to specialise as a legal interpreter is not yet available for SSL interpreters.

Key issues:

Swedish Sign Language is legally recognised. This has led to government funding for interpreter posts since 1976. Most graduates work full time for Swedish County Councils.

Most SSL interpreters graduate from 4 year programmes. Graduation is considered sufficient for employment purposes.

A voluntary registration test exists, run by the Swedish National Juridical Board for Public Lands and Funds but it seems that only circa 10% of SSL/English interpreters are "authorised" in this way (See footnote).

While national testing for legal and medical interpreting exists, they are not available for SSL/Swedish language pairs.

Some learning may arise re: administration of a register of certified interpreters. It has to be searchable and it seems sensible that registered individuals be obliged to be listed. Otherwise, the goal of safeguarding the public (and facilitating their fact-checking of claims of registration) are undermined by the administration of the system.

40 A sample search of the largest Swedish cities was kindly undertaken by Prof. Nilsson. She notes: "I tried finding SSL interpreters (regardless of whether authorized or "just trained") in Stockholm, and got 50. Then Örebro (next biggest Deaf population) and got 26, and finally Skåne and got 18." (Prof. Anna Lena Nilsson, Personal Communication, 29 July 2016).

5.2.8 New Zealand

> *"The route to qualification for NZSL interpreters has always been by training rather than testing"* (McKee et al. 2009: 208)

New Zealand is a country with a population of 4 million, and a deaf, New Zealand Sign Language (NZSL) using population estimated at 4,500 to 7,700, with members of the Maori community over-represented in the Deaf population (Dugdale 2001, McKee et al. 2009). NZSL was legally recognised in 2006 via the New Zealand Sign Language Act 2006 (McKee et al., ibid.). There is a 3-year degree in NZSL/English interpreting offered by the AUT University, Auckland[41] but no formal regulation of sign language interpreters exists (although the Maori Language Commission accredits Maori interpreters and translators under regulations introduced under the Maori Language Act 1987) (McKee et al. 2009). However, the development of a NZSL Advisory Board may change the current status vis-à-vis occupational regulation for NZSL interpreters in the near future[42].

It is worth noting that while sign language interpreting, as a profession, often evolves via a tradition of voluntary interpreting, followed by *ad hoc* training, followed, in turn, by academically recognised training, in New Zealand, the pathway was somewhat different (McKee et al. 2009). Here, however, organised interpreter training initiatives in 1985 and 1992 impacted on a Deaf community that had previously experienced very limited access to even voluntary interpreters. Instead, given a long history of NZSL suppression, it wasn't until the late 1970s that demand for interpreting as a formalised service was articulated (ibid.).

Established in 1997, the Sign Language Interpreters Association of New Zealand (SLIANZ) is the professional body of NZSL interpreters. It operates an online directory of qualified members which lists the interpreters' declared speciality areas. SLIANZ defines a qualified member as "members who hold a recognised sign language interpreting qualification from New Zealand or another accrediting body recognised by the Association."[43] SLIANZ is not an assessing body. If they wish to, NZSL interpreters can seek professional level accreditation with the New Zealand Society of Translators and Interpreters (NZSTI) if they are NAATI accredited (See Case Study 1 – Australia for details) or hold a university qualification in translation/interpreting. However, the NAATI tests were developed for Auslan, not NZSL, and as a result, they are not transferable in the way that NAATI's spoken language interpreting tests are (McKee et al. 2009). McKee et al. (ibid.) note that in 2008, 6 of the NZSTI's 260 professional members were sign language interpreters, suggesting that these had completed a university qualification.

In addition to managing their directory, SLIANZ requires members to complete Professional Development (PD) on an annual cycle, attaining 16 points per year. A list of sample PD events and the points associated with same are included in Table 5 below[44]:

41 See: http://www.slianz.org.nz/home/information-for-interpreters/become-an-interpreter; http://www.aut.ac.nz/__data/assets/pdf_file/0020/511454/NZ-Sign-language-Interpreting-Careers.pdf

42 See: http://www.aut.ac.nz/__data/assets/pdf_file/0020/511454/NZ-Sign-language-Interpreting-Careers.pdf

43 See: http://www.slianz.org.nz/about-slianz/join-slianz

44 See: http://www.slianz.org.nz/home/information-for-interpreters/professional-development?showall=&start=1

Table 5: SLIANZ Professional Development Sample Activities

The points for PD undertaken will be awarded as follows;

- One full day (6 hours or above) of PD directly related to interpreting proficiency, language development, and/or the interpreting profession – 4 points. i.e. 2 days of SLIANZ conference attendance is half of total requirement for the year.
- 2 - 4 hours of interpreting related PD – 2 points. e.g. evening workshop or meeting.
- 1.5 – 2 hours of interpreting related PD – 1 point.
- PD activities not directly related to interpreting will be awarded half the value of the above points. e.g. 2 – 4 hours tax workshop – 1 point.
- Interpreting related study will be capped at 12 points. e.g. post graduate diploma in sign language interpreting, or linguistics degree.
- Studies that are not directly related to interpreting but are complimentary will be capped at 4 points. e.g. law degree.
- Serving as a member of the SLIANZ committee will be awarded 6 points.
- Being a member of a professional group will be capped at 6 points with proof of attendance. e.g. interpreters, CHIG, WIN, GAIN. 2 points per meeting. (where the meeting has a PD focus, i.e. is not purely social). Proof of attendance will be minutes from meetings or similar.
- Acting as a mentor or mentee will be capped at 6 points. 6 sessions per year, at a minimum length of 1 hour, will be awarded 6 points. New graduates in their first year of interpreting must meet those 6 points.
- Writing an article for the SLIANZ newsletter will be awarded 2 points. The points for this will be capped at 4 points i.e. writing 2 articles.
- Reading a relevant book or article will be awarded 1 point. The points for this will be capped at 4 points. Evidence of having read the book or article will be a summary or reflection written and submitted to the PD committee.
- Presenting at the SLIANZ conference (or another relevant conference, e.g. NZSTI, ASLIA etc.) will be awarded 6 points. These points will be awarded on top of points awarded for attending conference.
- Presenting at a workshop will be awarded 4 points. These points will be awarded on top of points awarded for attending workshop.

This document gives an outline of how points will be awarded for the most commonly undertaken PD activities. However, if members feel that they have undertaken PD that does not match the above categories, they must submit their activities to the PD portfolio holders for them to decide allocation of points.

The SLIANZ committee will organise a minimum of 3 PD events per year and an annual conference. Members will be responsible for organising any other activities/events needed to fulfil their required PD.

'If individual members have completed (16 points per year) or partially completed PD requirements then either: 'Has met PD requirements' or 'Partially completed' will be displayed under their name in the SLIANZ Directory.

If individual members do not meet the PD requirements (16 points per year) there will be 2 results:

The individual will not be able to apply for money from the SLIANZ PD fund.

The individual's name will still be listed in the SLIANZ Directory, but the Professional Development section under the individual's profile on the SLIANZ Directory will remain blank

SLIANZ encourages members to take part in as many PD activities as possible to continue to develop their professional knowledge and skills.

Key issues:

NZSL is formally recognised, but there is no statutory regulation of sign language interpreters in place at present. The recent establishment of a NZSL Board may lead to change in this regard.

SLIANZ offers a directory of qualified members, along with their self-declared speciality areas.

Graduation from the AUT's 3-year Bachelor degree is an accepted path to practice.

SLIANZ requires ordinary (i.e. qualified) members to complete 16 CPD points on an annual cycle; while the organisation provides some opportunities for CPD, much of the responsibility for securing CPD is placed with the individual member.

5.3 Detailed Case Studies

In this section, we look in closer detail at three systems in place that seek to certify entry-level interpreter fitness to practice. We have selected the Australian, USA and UK models, as they offer a variety of approaches, all of which have been well tested. In Australia, there is long-standing experience of evaluating sign language and spoken language interpreters side by side for a voluntary register managed by a state-funded body, NAATI. There is also a provision in place for evaluating Deaf Interpreters. In the USA, there is an interpreter association (Registry of Interpreters for the Deaf (RID)) led registration system that evaluates interpreters at entry level, as well as (until 2016, when a sun-set clause was announced) offering certification for those working in legal settings and certification for Deaf Interpreters. A separate body, the Commission on Collegiate Interpreter Education (CCIE[45]) accredits interpreter education programmes. Finally, in the UK, an independent body, the National Registers of Communication Professionals Working with Deaf People (NRCPD)[46] accredits courses, facilitating the direct registration of graduates of these programmes on the register. They also run evaluation tests for BSL/English interpreters and for Deaf translators working between sign languages.

5.3.1 Australia

Bontempo and Levitzke-Gray (2009) report that despite Australia's land-mass being 50% greater than Europe (excluding the former USSR), the population is only 21 million, with an estimated 6,500 Auslan users (Johnston 2004). The Australian Sign Language Interpreters Association (ASLIA) was established in 1991, and incorporated in 1992. There are currently some 300 members listed on their website (2016)[47].

ASLIA aims to promote the employment of interpreters with NAATI interpreter credentials and strongly advise that service users from particular areas such as medical, education, and legal settings utilise a credentialed, experienced accredited interpreter who has undergone appropriate training. ASLIA promotes and provides on-going professional development and the best practice in Auslan/English interpreting. At the same time, a professional framework, including a Code of Ethics, Code of Conduct, policies and guidelines are in use. The main objectives are to support and represent Auslan/English interpreters in Australia promoting and maintaining collaboration with members, practitioners and stakeholders. In this way, ALSIA, the national organisation of interpreters has created synergies with their national interpreter accreditation process, providing the Code of Ethics which NAATI tests on and encouraging the employment of appropriately credentialed individuals.

Australia's training and accreditation process and procedure is administered by the government funded National Accreditation Authority for Translators and Interpreters Ltd. (NAATI), a non-profit organisation. Hale (2012:10) notes that "NAATI is unique in the world for a number of reasons, two of which are paramount: it is a national accreditation body with the laudable aim to accredit in over sixty international languages and forty-five indigenous languages, and it is owned by the Federal government and all State and Territory governments. For these reasons NAATI has been internationally recognised as very few countries have managed to have uniform systems that give credentials in so many languages".

NAATI accreditation can be secured via completion of a NAATI approved (i.e. accredited) course. That is, where a qualification at an educational institution holds NAATI approval, students who complete the qualification and assessment at the standard required by NAATI may apply for NAATI accreditation without further testing by NAATI.

45 http://ccie-accreditation.org
46 http://www.nrcpd.org.uk/approved-courses
47 https://aslia.com.au

NAATI approved courses are tertiary translation and interpreting qualifications (diploma-level or higher) conducted by individual VET and Higher Education institutions that are acknowledged by NAATI as teaching and assessing the skills and knowledge required by the profession. Where a qualification at an educational institution holds NAATI approval, students who complete the qualification and assessment at the standard required by NAATI may apply for NAATI accreditation without further testing by NAATI. NAATI approval acts as a 'quality' seal that gives credibility to an institution's course as well as providing a valuable incentive to future students. A number of TAFE and university courses in Auslan interpreting are available[48]. However, no NAATI accreditation is granted on the basis of overseas qualifications in signed languages other than Auslan.

NAATI accreditation is not legally mandated – it is not a statutory register: '…certification in Australia is not a consequence of legislation or legal requirements that individuals must satisfy to practice in the T&I sector.' (Hlavac 2013 p. 40)

There are currently 1009 Auslan/English accredited interpreters and 18 recognised Deaf Interpreters (Kevin Bleasdale, NAATI, Personal Communication, July 2016).

Bontempo and Levitzke-Gray (2009) report on moves in Australia seeking the establishment of a Registration Board for interpreters, which would require an Act of Parliament. However, to date, this has not happened (Bontempo, Personal Communication, June 2016). Instead, NAATI commissioned a report by Professor Sandra Hale and colleagues to review an improve the NAATI testing processes (Hale 2012), and, following from consultation with stakeholders, has implemented a process seeking to implement recommended changes. Before discussing the proposed changes in detail, we briefly outline the current assessment process in place in Australia.

48 www.naati.com.au).

Across the Auslan-English interpreting sector, all major interpreting agencies require a NAATI Paraprofessional Interpreter credential as the minimum level to be employed. However, Napier (2004: 351) notes that 'Interpreters are required to have achieved NAATI accreditation in order to be able to accept paid work in the field. Because of problems with supply and demand…many unaccredited interpreters work in educational institutions and rural areas.'

Currently, there are four levels of accreditation offered by NAATI, of which, only the paraprofessional interpreter and professional interpreter tests apply to Auslan/English interpreters (NAATI 2016):

Table 6: Current Levels of NAATI Accreditation (July 2016)

Paraprofessional Translator/ *Paraprofessional Interpreters*	Testing available for Auslan/English interpreters
Professional Translator/ *Professional Interpreter*	Testing available for Auslan/English interpreters
Advanced Translator/ Conference Interpreter	N/A
Advanced Translator/ Advanced Interpreter	N/A

Depending on the language pairs in question, NAATI certification can be achieved by (1) passing a NAATI test (more on this below); (2) successfully completing a NAATI-approved translation and/or interpreting course (TAFE diploma, advanced diploma or University undergraduate or post graduate degree) (of which there are 6[49]); (3) providing evidence

49 The Australian Interpreter Trainers Network (ITN) lists the following as accredited programmes: Central Institute of Technology WA; RMIT University VIC; TAFE SA; Macquarie University NSW; Sydney Institute of TAFE NSW and Southbank Institute of TAFE QLD. See: https://aslia.com.au/interpreter-trainers-network/ (July 2016).

of overseas qualifications recognised by NAATI (this does not apply to Auslan/English interpreters); (4) Through membership of a recognised international association in translating and interpreting; (5) By providing evidence of advanced standing in translating or interpreting.

In the Australian model, candidates who have not completed an accredited interpreter education programme can currently present for NAATI testing, although this is currently under review. NAATI requires that Auslan/English interpreters have an awareness of the effects and particular challenges of cultural background of the persons for whom they interpret. Knowledge of the ethics of interpreting is required.

5.3.1.1 NAATI Paraprofessional Interpreter Accreditation Testing

To be eligible to sit for a NAATI Auslan/English Paraprofessional Interpreter test, applicants must have an education equivalent to at least four years of Australian secondary education (Year 10) and proficiency in both languages. In cases where a person's education has been interrupted for any special reason, these criteria may be waived, or alternative criteria substituted, at the discretion of NAATI. Typically, the test takes approximately 40 minutes, including 10 minutes unallocated time to allow for unforeseen delays. There are three sections to the test, and all Auslan testing is video recorded.

Section 1: Social and Cultural Awareness (5 marks): Four questions are put to the applicant relating to the social and cultural awareness of interpreting. The first two questions are asked and should be answered in English. The next two questions are asked and should be answered in Auslan. The questions in this section are designed to assess the extent to which the applicants understand how social and cultural factors and/or socio-political issues affect situations where an interpreter would typically be used.

Section 2: Ethics of the Profession (5 marks): Four questions are put to the applicant based on the ASLIA *Code of Ethics*. The first two questions are asked and should be answered in English. The next two questions are asked and should be answered in Auslan. The questions are designed to elicit the applicant's awareness of the ethics of the profession.

Section 3: Dialogue Interpreting (2 X 45 = 90 marks): There are two dialogues of approximately 300 words each between an English speaker and an Auslan signer. The dialogues are divided into suitable segments, which will not normally exceed 35 words each. Dialogue one is interpreted in the consecutive mode and dialogue two is interpreted in the simultaneous mode.

In order to pass this test and be eligible for accreditation as a Paraprofessional Interpreter, applicants must obtain:

a) At least 2.5 marks out of 5 for Cultural and Social Awareness Questions
b) At least 2.5 marks out of 5 for Ethics of the Profession Questions
c) At least 63 marks out of 90 for both dialogues with a minimum of 29 marks in each dialogue
d) At least 70 marks out of 100 in total.

5.3.1.2 Professional Interpreter Accreditation Testing

To be eligible to sit the NAATI Auslan/English Professional Interpreter test, applicants must hold a degree or diploma level in any field; or current NAATI Accreditation as a Paraprofessional Interpreter in Auslan/English interpreting. The professional interpreter accreditation test takes approximately 75 minutes. It comprises 2 sections:

Section 1: community and legal interpreting: This section includes one interpreting dialogue as well as 2 social/cultural awareness questions, 2 ethics questions, a sight translation that is related to the dialogue and an Auslan to English monologue.

Section 2: professional and academic interpreting: This section includes a dialogue, 2 social/cultural awareness questions, 2 ethics questions and an English to Auslan monologue.

The dialogues include challenging subject matter associated with situations like police interviews, court cross-examinations, counselling session, medical appointments and academic discussions. The monologues focus on topics such as judges' court summations and university presentations rather than conference papers. Current test guidelines advise that there is no specific amount of finger spelling that needs to be incorporated into the test. NAATI notes that finger spelling will be guided by the text itself and should flow naturally in the interpretation presented.

In order to pass this test and be eligible for accreditation as a Professional Interpreter[50], applicants must obtain:

a) At least 5 marks out of 10 for the Social/ Cultural Questions

b) At least 5 marks out of 10 for the Ethics of the Profession Questions

c) A total of at least 35 marks out of 50 for both dialogues

d) A total of at least 14 marks out of 20 for both sight translations

e) A total of at least 21 marks out of 30 for both consecutive passages

f) A total of at least 70 marks out of 100 for the interpreting part of the test (consecutive dialogues, sight translations and consecutive passages).

50 See: https://www.naati.com.au/media/1105/accreditation_in_auslan_booklet_200416.pdf

5.3.1.3 NAATI Recognition of Deaf Interpreters[51]

NAATI also provides "recognition" of Deaf Interpreters (DI). Recognition is granted on the basis of a direct application to NAATI with the required evidence and paperwork. It is an acknowledgement that at the time of the award the candidate had recent and regular experience as a translator and/or interpreter, but no particular level of skill is specified. Recognition is only granted in languages of low community demand for which NAATI does not currently offer accreditation testing. Should the demand for these services increase to a sufficient level, NAATI state that they will consider establishing testing and accredit practitioners.

Applications for DI recognition require candidates to provide evidence to meet the following three criteria:

1. Proficiency in Auslan

This must be demonstrated by one of the following:

› Evidence that the applicant has completed the majority of their primary and secondary education (up to year 12[52]) where Auslan, or English and Auslan, were the languages of instruction. The evidence must show the number of years completed (not just that education to a particular year, Year 12 for example, has been completed); OR

› A letter from one of the following organisations confirming the applicant's membership in the local deaf community and fluency in Auslan:

1. Deaf Society of New South Wales
2. Deaf Services Queensland

51 See: https://www.naati.com.au/media/1287/deaf_interpreting_information_booklet_180316.pdf

52 Year 12 is the twelfth year of formal education (beginning with first class of primary school), which in an Irish context, equates to completion of fifth year of secondary school.

3. Royal South Australian Deaf Society (Deaf CanDo)
4. Tasmanian Deaf Society (TasDeaf)
5. Victorian Deaf Society (VicDeaf)
6. Western Australian Deaf Society (WADeaf)

- Completion of a diploma in Auslan teaching; OR
- Current NAATI Auslan-English accreditation at the Paraprofessional level or above.

For DI recognition to be granted, candidates must complete a NAATI endorsed Deaf Interpreting course or workshop program. The minimum standard for acceptable introductory interpreter training courses is 15 hours of face-to-face training including DI-specific theory and practice, ASLIA Code of Ethics and practical components. NAATI works on an ongoing basis with the Australian Sign Language Interpreters Association (ASLIA) to ensure there is an accessible pathway to recognition through acceptable training for prospective DIs. The training course or workshop programme completed by a candidate must be completed prior to submitting an application, and evidence of completion must be included with the application form. Candidates seeking DI recognition must have work experience as a translator and/or interpreter. They must provide evidence of this in their application form with at least two work reference letters which must meet the following criteria:

- They must be issued by different employers and/or organisations.
- At least one reference must be from an interpreting service provider, where the candidate has been contracted, employed or engaged in DI duties for at least three months.
- Each reference must demonstrate that the candidate has completed some work in the language and each skill for which they are applying for recognition. This may include *pro bono* work.
- The references must demonstrate that the work experience is current, regular and ongoing, i.e. each reference must cover a period of at least three months. At least one reference must cover the three months immediately preceding the application. Other references may cover work experience that has been completed no more than six months ago.
- Each reference letter must be on the organisation's letterhead and be signed and dated by an individual authorised to provide this reference on behalf of the organisation.
- Each reference in the format stipulated in the application form (Section 6A and 6B). NAATI considers reference letters from organisations, including volunteer organisations, as long as the reference letter meets the criteria outlined above.

Languages in which DI recognition is awarded

1. Auslan/Non-Conventional Sign Language (NCSL) - Interpreting between Auslan and a sign language that is idiosyncratic or non- conventional.
2. Written English/Non-Conventional Sign Language (NCSL) - Sight translation from written English forms or documents into sign language that is idiosyncratic or non-conventional.
3. Auslan/Adapted Sign Language - Interpreting between Auslan and a visually adapted or tactile form of sign language used by Deafblind or Deaf persons with low-vision.
4. Written English/Auslan - Sight translation from written English forms or documents into Auslan.
5. Auslan/Conventional Sign Language - Interpreting between Auslan and a standardised foreign sign language (i.e. BSL, JSL, ASL, etc.).

For each of the combinations (A to E) above, the interpreter needs to provide two referee reports for work specifically referencing that the applicant has worked in that combination. This may mean providing more than two referee reports in total.

5.3.1.4 NAATI Pre-testing and pass rates

NAATI points out that prior to testing, candidates must self-assess their current skills and knowledge. NAATI does not provide training, but they do offer short workshops and samples of accreditation tests[53] that can help candidates determine their readiness to sit a NAATI accreditation test. They emphasise that the NAATI accreditation test is not a language test, but rather a test to evaluate if a candidate has the skills and knowledge to translate or interpret at a particular level. They note that their test is not easy, citing their responsibility to ensure that accredited practitioners have the skills to do the job, so the interpreting and translating needs of all Australians are met. They also point out that a candidate may not pass the test, even with repeated attempts, noting that those who do pass the test have usually completed extensive preparation to develop their translating or interpreting skills. The overall pass rate is very low, at about 10-15%[54].

NAATI's Dave Deck presented on NAATI test marking at the New Zealand Society of Translators and Interpreters' annual conference in June 2015. He noted that the results of each test are determined by two markers, and wide discrepancies are resolved by a third marker. The tests are marked based on acceptable responses, not ideal solutions or what the examiners would have done themselves. There is a strong emphasis on accuracy, to ensure that the content and intent is faithfully conveyed. The quality of language is mainly viewed in terms of how well it contributes to accuracy. He suggests that the low pass rate arises because an overwhelming number of candidates are completely unprepared for the exam with many assuming that some degree of bilingualism is all that is required. He suggested that in the interpreting test, many candidates do not have sufficient memory retention and listening skills, and many rely too heavily on notes. A lack of skills in 'rapid transfer' of meaning from one language to the other is also common. Insufficient proficiency in a candidate's L2 often leads to miscomprehension (when working from L2 to L1) and difficulty expressing complex ideas (when working from L1 to L2). An insufficient breadth of vocabulary is another problem, especially in specialised medical and legal registers[55].

5.3.1.5 NAATI Revalidation

From 1 January 2007, all accreditations and recognitions awarded by NAATI were awarded with an expiry date (this date being three years from when it was awarded). A grandfather clause was implemented to carry over previously accredited interpreters, but, at the same time, practitioners with older accreditations have the opportunity to opt-in to the system of revalidation. Revalidation requires a minimum threshold of interpreting work to be undertaken on an annual basis across a three-year cycle and for the accredited interpreter to complete continuous professional development. Interpreters seeking revalidation must provide:

1. Evidence of Work Practice as an interpreter (An average of 40 assignments or 40 hours per year over the three years (120 assignments or 120 hours in total) for interpreting accreditations. An assignment is any job ranging in time from less than one hour up to a day).
2. Evidence of Professional Development activity (Ethics of the Profession (30 hours); Maintenance of Language (30 hours); Skills Development (30 hours); Complementary Skills Development (No minimum); and Contribution to the Profession (No minimum) (Total:120 hours).
3. An application for Revalidation prior to expiry of the accreditation.

53 See: https://www.naati.com.au/resources/products/

54 See: http://foxdocs.biz/BetweenTranslations/naati-translation-interpreting-tests/

55 See: http://foxdocs.biz/BetweenTranslations/naati-translation-interpreting-tests/

If the accreditation is revalidated, it will be valid for a further three years.

NAATI sees revalidation as the mechanism by which translators and interpreters with NAATI accreditation or recognition demonstrate at regular intervals that they remain up-to-date and fit to accept assignments and work, and as a hallmark evidencing that the interpreter is:

- Consistently working as a translation or interpreting professional
- Constantly developing ethical decision making and professional skills
- Maintaining language and vocabulary
- Contributing to the overall translating and interpreting profession

If a practitioner does not apply for revalidation or does not meet the revalidation criteria, their accreditation or (in the case of DIs) recognition will lapse. Practitioners whose accreditation lapses or who do not meet the revalidation requirements will be able to re-obtain the accreditation through one of the available pathways to that accreditation – that is, they can re-test.

The NAATI revalidation builds in consideration for maternity leave or illness provisions. Medical evidence must be provided in support of any claim in this regard, allowing for a year's extension to be provided for a practitioner to meet the revalidation requirements, one year pro rata, in circumstances where no work is undertaken over the revalidation cycle. Where a practitioner was able to work for a proportion of the revalidation cycle the assessment will be on a *pro rata* basis.

Revalidation conditions also exist for practitioners holding Paraprofessional Interpreter accreditation. Translators and interpreters with Paraprofessional level accreditation have special obligations. Individuals holding this type of accreditation will be given a maximum of two periods of revalidation (i.e. six years) during which an attempt to upgrade the accreditation to Professional level must be made. If no Professional level accreditation is available, then NAATI will not require an attempt to upgrade.

Candidates must attempt to upgrade to Professional level over two revalidation periods, otherwise the accreditation will lapse, irrespective of whether the revalidation criteria are met. If an attempt to upgrade to Professional level is unsuccessful the practitioner can revalidate their Paraprofessional accreditation. The Practitioner then has two further revalidation periods to attempt to reach the Professional level.

Translators and interpreters who hold a NAATI recognition can only revalidate their recognition while testing has not been established for the language and skill. If testing for a language is established, NAATI phases out 'recognition' standing, irrespective of whether the revalidation criteria are met.

NAATI provides logbooks for the record-keeping of interpreting work practice and revalidation professional development activities, the latter of which is also used by ASLIA, the Australian of Sign Language Interpreters Association and AUSIT, the Australian Institute of Interpreters and Translators Inc[56]. (See Appendix 1).

NAATI conducts audits of a proportion of revalidation applications each year. Those practitioners audited will be asked to provide records proving the professional development and work practice claimed in the logbooks.

56 http://ausit.org/AUSIT/Professional_Development/PD_Points_System___Log_Book/AUSIT/PD/PD_-_logbook.aspx

5.3.1.6 Current Process of Change: From "Accreditation" to "Certification:

As mentioned above, NAATI commissioned Professor Sandra Hale to prepare a report reviewing their testing processes (Hale 2012). Hale (2012:7) notes that her report "highlights the need for improvement in the areas of prerequisites to accreditation, validity and reliability of testing instruments, assessment methods and training of examiners." She goes on to note that shortcomings identified are not unique to NAATI or to Australia, pointing out that a number of certification bodies around the world are now beginning to address them and argues that it is time for NAATI to do the same.

Hale offers 17 recommendations for modification, but most critically, proposes a re-conceptualisation of the process to entail 2 possible pathways to certification (ibid. 37):

1. Accreditation via completion of a formal NAATI approved course of study, either through the VET or Higher Education sectors, as currently instituted. Final NAATI examinations to be administered at the completion of the training and monitored by NAATI, as is currently the case.
2. Accreditation through a staged approach that includes pre-testing compulsory training modules and other pre-requisites…. The training modules can be delivered by educational institutions but the final NAATI examinations should be administered by NAATI.

Hale proposes that only two levels of interpreting be certified: at generalist level and at specialist level (with sub-categories for legal, medical, conference and business settings). She notes that the decision to propose specialisations in interpreting was informed by international practices as well as by the high level of support for interpreting specialisations.

The changes proposed (but not yet implemented) seek to maintain the category of Recognition, though Hale argues that recipients of this status should also be required to complete compulsory training modules. Further, changes proposed across the board would not be applied retrospectively: rather, a grandfathering in process would apply although Hale argues that all accredited parties who have not received any training should be encouraged to complete the compulsory training modules that would be offered to new candidates and, later, to put themselves forward for the specialized categories.

Other recommendations include:

1. The creation of an information package explaining the meaning of Interpreter and Translator, prerequisites for testing and expectations of potential candidates, including expected levels of language proficiency in English and the language other than English (LOTE).
2. That an Advanced Diploma in any discipline (or equivalent) be the minimum prerequisite for the Generalist accreditation, and a Bachelor's degree in any discipline (or equivalent) or a NAATI approved Advanced Diploma in Interpreting be the minimum pre-requisite for Specialist accreditations.
3. That interpreting tests be conducted live, as much as possible. Where this is not possible, that candidates be provided with video recorded interactions and that their performance be video recorded for marking.
4. That interpreting tests at the Generalist level for both spoken and signed languages include a telephone interpreting component consisting of protocols for identification of all interlocutors, confidentiality assurances and dialogue interpreting only.
5. That a validation research project be conducted to design the new testing instruments.

6. That new assessment methods using rubrics be empirically tested as part of the validation project.
7. That new examiners' manuals be written to reflect the new assessment methods to be adopted.
8. That NAATI review the current composition of examiners' panels to include more graduates of approved courses and fewer practitioners who hold no formal qualifications in interpreting and translation.
9. That examiners undertake compulsory training before being accepted on the panel, and continuous training while on the panel.
10. That NAATI establish a new Expert Panel, with subpanels for the specialisations, to design the curricula for the compulsory training modules and provide guidelines for the final assessment tasks.
11. That NAATI continue to approve tertiary programs and encourage all applicants to take the formal path to accreditation where such is available for the relevant language combinations.

Following from this, NAATI has undertaken significant steps towards implementing the recommendations made.

One of the changes to be implemented relates to the nomenclature used regarding credentialing: "NAATI has always referred to the types of credential it awards as accreditations. However, internationally the term certification is used. Within this context certification applies to an individual rather than an organisation for a conformity assessment: a demonstration that the individual has fulfilled specified requirements relating to a product, process, system, person, or body. This is also the specific term used within International Organization for Standardization (ISO) definitions. The term accreditation is used for organisations that do the certifying – they are usually accredited by some higher standards-setting body. The NAATI credentialing system, to be consistent with the terminology used internationally, will therefore be referred to as a certification scheme." (NAATI 2016).

Key issues:

NAATI's review is the most current and comprehensive review of processes available, underpinned by empirical research by established experts in the field.

Builds on international best practice and seeks to incorporate the ISO 13611 (2014) standards for community interpreting into their revised model of certification.

Acknowledges that not all languages have the same resources available to them but provides for a minimum training requirement and pre-certification readiness checks to promote success (e.g. this could apply to how we think about recognising Deaf Interpreters).

Facilitates the development of DIs, although NAATI applies a "recognition" rather than registering on the same footing as for hearing interpreters.

Facilitates grandfather clause and "sunsetting" approaches as a mechanism to facilitate change over time.

Cost – economies of scale that apply in Australia?

5.3.2 The United States

> "… various federal laws (e.g. the Americans with Disabilities Act) created a social fabric in which the provision of sign language interpreting has come to be viewed as a right." (Winston and Cokely 2009: 267)

Over 322 million people live in the United States of America. Among them are an estimated 500,000 to two million deaf ASL users (Lane, Hoffmeister and Bahan 1996). The Registry for Interpreters for the Deaf (RID) is a national membership organisation founded in 1964; the first national certification and assessment system was introduced by RID in 1972 (Winston and Cokely 2009).

In 2013, RID, with the National Association of the Deaf (NAD) published an independent review of the National Interpreter Certification (NIC) test validity, reliability and candidate performance. The report found that the NIC exams demonstrate content validity, as they draw upon best practice standards for exam development by national certifying agencies like the national Council for Certifying Agencies (NCCA) and American National Standards Institute (ANSI), and vignettes are built around domains identified in the National Council on Interpreting's (NCI) 2012 Role Delineation Study (i.e., they take a criterion referenced approach). Reliability for the multiple choice test was deemed appropriate and the authors note that for the performance components, the 30% pass rate in the sample reviewed, while low, is not unusual for professional-level performance examinations (NAD/RID 2013). However, the RID Annual Report 2015 provided the following detailed breakdown for examination outcomes for 2015:

Table 7: 2015 RID Certification Exam Results

Exam Type	Passed	Failed	Total	Pass %
CDI Knowledge Exam	36	38	74	48.65%
CDI Performance Exam	27	12	39	69.23%
NIC Knowledge Exam	659	81	740	89.05%
NIC Performance Exam	173	717	890	19.44%
SC:L Knowledge Exam	27	12	39	69.23%
SC:L Performance Exam	22	31	53	41.51%

In June 2016, RID established the Center for the Assessment of Sign Language Interpretation (CASLI), a subsidiary organization, to take over the administration, ongoing development and maintenance of exams. Eligibility requirements and the credentialing of individuals will, however, remain the responsibility of RID[57]. While RID had previously run specialist certification testing for interpreters working in legal domains (the Specialist Certificate: Legal (SC:L)) and certification for those working in educational settings (Ed: K-12), these were phased out (or, in their terms, "sunset") in 2016[58]. At present there are some delays with testing, but the examinations that will be offered via CASLI are the National Interpreter Certification Exam (NIC) (Interview and Performance Testing resume in September 2016) and the Certified Deaf Interpreter Exam (CDI) (from 2018).

In the next sections, we present an overview of the NIC and CDI testing processes, and then turn to consider how these fit with the requirements for licensing that arise in some states. We will also look at the accreditation of IEPs by the Commission on Collegiate Interpreter Education (CCIE).

57 http://rid.org/rid-certification-overview/nic-certification
58 http://rid.org/rid-certification-overview/previously-offered-rid-certifications/

5.3.2.1 The National Interpreter Certification Exam (NIC)

Holders of the National Interpreter Certification Exam (NIC) are deemed to have demonstrated general knowledge in the field of interpreting, ethical decision making and interpreting skills. Candidates earn RID's NIC Certification if they demonstrate professional knowledge and skills that meet or exceed the minimum professional standards necessary to perform in a broad range of interpretation and transliteration assignments. In order to be eligible to apply for registration, an interpreter must have successfully completed a Bachelor degree (in any discipline) and successfully complete the test components and commit to a certification maintenance programme.

There are 4 components to the NIC:

(1) A multiple-choice NIC Knowledge Exam. Candidates who have passed the knowledge exam within 5 years and meet RID's educational requirement (a Bachelor degree in any discipline) may then take the NIC Interview and Performance Exam.

(2) The NIC Interview, which explores a candidate's approach to dealing with potential ethical dilemmas; and

(3) The NIC Performance Examination, which is a vignette-based assessment using video to deliver and record the assessment.

Certification is awarded at this point.

(4) Certification Maintenance Programme (CMP): Across a four-year cycle, certified interpreters must complete 8.0 Continuing Education Units (CEUs) (8.0 CEUs = 80 contact hours[59]). Continuing Education Units can be derived from a number of sources. It can include academic coursework taken from an accredited institution, RID-approved sponsor initiated activities, Participant-initiated non-RID activities (PINRA) and Independent study activities[60]. An overview of the RID's CEU requirements can be seen in Figure 1 below.

It is worth noting that the CMP is highly developed, with online tracking systems monitoring CEUs recorded, with many conferences that are approved for RID CEUs providing bar-codes for sessions attended, which are scanned by conference organisers. These are then automatically logged with the RID's membership management system, and CEU statements can be viewed by members online. They also receive statements to advise them of their current CEU standing. See Appendices 2 and 3 for an example of how CEU statements are processed and reported.

59 For those who hold the SC:L, 2.0 CEUs must be in legal interpreting topics.

60 http://rid.org/continuing-education/certification-maintenance/

Figure 1: Earning RID CEUs

How to Earn RID CEUs
and Reach CMP Success!

Academic Coursework

Definition: degree-earning courses at an accredited college (listed on the Council for Higher Education Accreditation's Web site www.chea.org/search)

- Grade of A,B, C or Pass
  1 quarter = 1 RID CEU
  1 semester hour = 1.5 RID CEUs
- CEUs are processed within the same CMP cycle in which the class was taken and completed.
- Sponsor will provide and assist you with completing the Academic Coursework form.

Independent Study

Definition: self-designed projects to develop skills or knowledge in a specific area (e.g., class or workshop development and presention, mentor/mentee work, self-study class, literature review, etc.)

- The activity MUST be pre-approved by an RID Approved Sponsor. Sponsor will provide and assist you with completing the Independent Study forms.
- All requested paperwork must be submitted to the Sponsor so it can be processed and submitted to RID within 45 days after the end of the Independent Study.
- Earn up to 2.0 CEUs per Independent Study. Must be completed within 12 months.

Sponsor Initiated Activities

Definition: pre-approved RID Sponsored Activities (Advertising shows the RID CMP logo)

- Attendee must sign the Activity Report Form with name and RID member number or submit CEU tracking sheet to get CEU credit.
- Presenters may earn General Studies CEUs the first time they present a workshop once per CMP cycle (mark it on the Activity Report Form)

PINRA

Definition: educational activities NOT offered by RID Approved Sponsors. (e.g., non-mandatory school district in-services, audited non-credit or continuing education classes, etc.)

- The activity MUST be pre-approved by an RID Approved Sponsor. Sponsor will provide and assist you with completing the PINRA form.
- All requested paperwork, such as proof of attendance, must be submitted to the Sponsor so it can be processed and submitted to RID within 45 days of the end of the activity.

ALL RID CEUs ARE PROCESSED THROUGH RID APPROVED SPONSORS.
Find one using the "Find CMP/ACET Sponsor" search tool on the RID Web site (www.rid.org) in the purple "Search Tools" box on the left.

You cannot earn CEUs for the following: interpreting, activities required by employer or part of routine employment responsibilities, meals, socials or entertainment, or workshops that were attended but NOT pre-approved by an RID Approved Sponsor.

5.3.2.2 Certified Deaf Interpreter (CDI)

CDIs are deaf or hard of hearing and have demonstrated knowledge and understanding of interpreting, deafness, the Deaf community, and Deaf culture. CDIs have specialized training and/or experience in the use of gesture, mime, props, drawings and other tools to enhance communication. Holders are required to possess native or near-native fluency in American Sign Language and are recommended for a broad range of assignments where an interpreter who is deaf or hard-of-hearing would be beneficial. This credential has been available via RID since 1998. To be eligible to take the CDI examinations, candidates must first have completed a mandatory 40 hours of professional development as outlined in Table 6 below and submit evidence to RID that they meet the Bachelor degree educational requirement (RID notes that the bachelor's degree requirement has been delayed until the new CDI Performance Exam is available. The BA degree requirement will enter into effect six months after the new CDI Performance Exam becomes available again – scheduled for 1 July 2018)[61].

61 http://rid.org/rid-certification-overview/cdi-certification/

Table 8: CDI Knowledge Exam Eligibility Requirements – RID/ CASLI

CDI Knowledge Exam Eligibility Requirement

**Applicants must show eligibility by meeting all of the requirements below.*

Submitting 40 Hours/4.0 CEUs of Interpreter Training

8 hours/0.8 CEUs required on the NAD-RID Code of Professional Conduct – Recommended topics include: Ethical Decision Making and Ethics in Interpreting

8 hours/0.8 CEUs required on the Introduction to Interpreting – Recommended topics include: Interpreting 101

8 hours/0.8 CEUs required on the Process of Interpretation – Recommended topics include: The Deaf Interpreter at Work, Deaf/Hearing Team Interpreting, Deaf/Deaf Team Interpreting, Interpreting for Deaf Blind consumers, Deaf Interpreting Processes, Deaf Interpreting Theory and Practice, Consecutive Interpreting, Simultaneous Interpreting, Sight/Test Translation, Visual Gestural Communication, and Platform Interpreting

16 hours/1.6 CEUs required on the elective(s) of your choice – Recommended topics include: ASL Linguistics, Mentorship Programs, and Interpreting Practicum, Additional training in any of the required content areas above

Please note: For a semester class, the number of CEUs equals 1.5 semester credits (i.e. a 3 credit course = 4.5 CEUs). For a quarter class, the number of CEUs equals 1 quarter credit (i.e. a 3 credit course = 3 CEUs).

Having met the pre-testing requirements, the CDI certification process involves the following components:

(1) A multiple-choice CDI Knowledge Exam.

(2) Candidates who have passed the knowledge exam within 5 years and meet RID's educational requirement may then take the CDI Performance Exam, a video recorded assessment.
Certification is awarded at this point.

(3) Certification Maintenance Programme: Across a four-year cycle, certified interpreters must complete 8.0 CEUs (8.0 CEUs = 80 contact hours). Continuing Education Units can be derived from a number of sources. It can include academic coursework taken from an accredited institution, RID-approved sponsor initiated activities, Participant-initiated non-RID activities (PINRA) and Independent study activities.

5.3.2.3 Licensing – Legally Mandated in Some States

RID reports that State regulation of sign language and oral interpreters is a growing national concern. They note that the desire for state regulation emerged in the early 1970s, but that the effects produced by the Americans with Disabilities Act (ADA) (1990) had much greater significance. The ADA legislation "transformed the face of professional interpreting and caused the demand for interpreting services to soar to unprecedented heights"[62], and across the USA, there is insufficient supply of interpreters to meet the demands in place.

The ADA defines a "qualified interpreter" as one "…who is able to interpret effectively, accurately and impartially both receptively and expressively, using any necessary specialized vocabulary[63]."

RID note that this definition continues to cause confusion among consumers, service providers and professional interpreters. While the definition empowers deaf and hearing consumers to demand satisfaction, it provides no assistance to hiring entities (who are mandated by ADA to provide interpreter services) in determining who is "qualified" prior to the provision of services. This, they note, is a critical point. "Without the tools or mechanisms to identify who has attained some level of competency, hiring entities are at a loss on how to satisfy the mandates of ADA in locating/ providing "qualified" interpreter services[64]." Licensing/ registration requirements help somewhat by offering a point of reference – and legal recourse – for service providers.

In the United States, statutory regulation of professions is determined at state level, and this applies equally to sign language interpreters. RID outlines licensure, certification, registration or other requirement required in each state[65]; 14 states require licensing in order to practice as a professional interpreter. Puerto Rico, an Associated Free State of the USA, also requires licensing.

- Alabama
- Arizona
- Arkansas
- Illinois
- Iowa
- Kentucky
- Maine
- Missouri
- Nebraska
- New Hampshire
- New Mexico
- North Carolina
- Rhode Island State
- Wisconsin

62 http://rid.org/government-affairs-program/state-licensure/

63 https://www.ada.gov/effective-comm.htm

64 http://rid.org/government-affairs-program/state-licensure/

65 http://rid.org/advocacy-overview/state-information-and-advocacy/

What this means in practice is that an individual who is not adequately licensed can be fined and/or prosecuted for presenting as an interpreter. For example, in the State of Maine, violations are dealt with under **§8003-C**[66]. Unlicensed practice. Par. 4 notes that civil penalties apply to:

> "any person who practices or represents to the public that the person is authorized to practice a profession or trade or engage in an activity that requires a license without first obtaining a license as required by the laws relating to a board, commission or regulatory function identified in section 8001, subsection 38 or section 8001-A or after the license has expired or has been suspended or revoked commits a civil violation punishable by a fine of not less than $1,000 but not more than $5,000 for each violation. An action under this subsection may be brought in District Court or, in combination with an action under subsection 5, in Superior Court".

Further, Par. 5. allows for injunctions to be implemented:

> "…A person who violates the terms of an injunction issued under this subsection shall pay to the State a fine of not more than $10,000 for each violation. In any action under this subsection, when a permanent injunction has been issued, the court may order the person against whom the permanent injunction is issued to pay to the General Fund the costs of the investigation of that person by the Attorney General and the costs of suit, including attorney's fees. In any action by the Attorney General brought against a person for violating the terms of an injunction issued under this subsection, the court may make the necessary orders or judgments to restore to any person who has suffered any ascertainable loss of money or personal or real property or to compel the return of compensation received by reason of such conduct found to be in violation of an injunction."

No documentation was found outlining the impact of licensing on the *interpreting* profession, (although Brunson (in press) makes reference to the power associated with certification and licensing), given that consumers/clients use licensing as a "measuring stick". However, another profession that has been licensed, opticians, has seen an impact report recently completed. Timmons and Mills (2015: 18) report that:

> "We find consistent evidence that opticians earn more in states that have had licensing statutes in effect for longer periods of time (about 0.5 percent more per year of statute) and in states that have more exams (about 3.0 percent more per exam required) and more stringent education and training requirements (about 2.0 percent more per 100 days of education and training required). In the only state with certification, Texas, we find no evidence of a similar increase in earnings. Taken together, the results indicate that optician licensing is increasing the earnings of professionals at the expense of consumers. Of the 50 US states and one jurisdiction, 30 do not license opticians and appear to have well-functioning markets that provide quality care to consumers, as measured by the comparison of quality of service using vision and malpractice insurance premiums. The best interests of consumers would be served by eliminating optician licensing or, at the very least, scaling back existing licensing statutes to certification statutes."

While we cannot assume a direct link between opticians and interpreters, the issue of cause and effect between any kind of statutory occupational regulation and potential impact for the stakeholders served by the professional group must be examined closely. The assumption that standards will increase automatically as a result of voluntary or statutory regulation or licensing must be tested.

66 http://www.mainelegislature.org/legis/statutes/10/title10sec8003-C.html

5.3.2.4 Accreditation of Interpreter Education Programmes (IEPs)

Separate from the certification and/or licensing of interpreters is the accreditation of IEPs by the Commission on Collegiate Interpreter Education (CCIE)[67]. CCIE was founded in 2006 to promote professionalism in the field of sign language interpreter education through the process of accreditation. CCIE was established after nearly two decades of collaborative efforts of six stakeholder organizations, the National Alliance of Black Interpreters, Inc., National Registry of Interpreters for the Deaf (RID), National Association of the Deaf (NAD), Conference of Interpreter Trainers (CIT), Association of Visual Language Interpreters of Canada (AVLIC) and the American Sign Language Teachers Association (ASLTA). In 2008, CCIE became a member of the Association of Specialized and Professional Accreditors (ASPA).

There are pre-requisites in place for programmes that seek accreditation. These include:

1. The institution in which the program is housed must be regionally accredited.
2. The IEP must require students to have successfully completed a minimum of 2 years of ASL classes, or to possess equivalent proficiency, prior to taking interpreting skills courses.
3. The IEP must include an authentic interpreting fieldwork experience where students are supervised by interpreter mentors who are nationally certified, holding psychometrically reliable and valid credentials (e.g., the Registry of Interpreters for the Deaf, RID, or the Association of Visual Language Interpreters of Canada, AVLIC).
4. If the IEP is applying for accreditation of a curriculum also delivered via distance education there must be evidence provided of adherence to best practices in blended and distance education (e.g., adherence to Quality Matters rubrics or similar quality assurance metrics).
5. The IEP must have had at least three graduating classes complete their degree.

Programmes must also provide evidence that they meet the standards outlined in the CCIE Accreditation Standards 2014[68]. These fall under 10 headings:

1. Mission, Goals and Core Values
2. Resources and Facilities
3. Students
4. Faculty
5. Curriculum Design
6. Curriculum: Knowledge Competencies
7. Curriculum: Skill Competencies
8. Curriculum: Interpreting Field Experience
9. Outcomes, Assessments and Evaluation
10. Improvement, Planning and Sustainability

Interpreter Educator Programmes seeking accreditation must to apply for candidacy and submit a letter of intent, a completed CCIE Application for candidacy form, and pay a non-refundable Application Fee of $600. CCIE reviews submitted materials to determine if the IEP is sufficiently prepared to begin the self-study review process. If so, the IEP is awarded candidacy status and are required to prepare a self-study process and self-study report: In June of the following year, programs will submit the final Self Study Report and associated documentation. The review is then peer reviewed by a team of raters. If the documentation is considered satisfactory, CCIE schedules a site visit. The site visit entails an

67 http://ccie-accreditation.org

68 http://ccie-accreditation.org/wp-content/uploads/2014/12/CCIE_Accreditation_Standards_2014.pdf

onsite team assessing the IEP and reporting back on their findings and recommendations to the CCIE. The CCIE then makes the final decision regarding accreditation status.

Only a small percentage of IEPs are currently accredited by CCIE in the USA: currently, 5 Associate of Arts Degree (AAD) programmes and 13 bachelor degree programmes are accredited[69]. In contrast, RID lists 78 AAD programmes, 41 bachelor degree programmes, 48 certificate programmes, 5 distance education programmes and 4 master degree programmes that are offered across the USA[70]. Given that since 2013, interpreters are required to hold a bachelor degree as a pre-requisite for the NIC, accreditation offers quality assurance regarding the curricular, resource and philosophical underpinnings of IEPs offered.

Key issues:

RID holds the voluntary register of interpreters. From 2016, testing will be administered by CASLI.

There are pre-requisites in place for certification, including completion of a Bachelor degree (in any subject).

Psychometric tests have been evaluated and have been shown to be reliable and valid.

In some states, certification is required in order to secure a license. In 14 states plus the Associated Free State, Puerto Rico, licensing is mandatory. In other states, certification is required, while in others, certification is not obligatory and no statutory licensing exists (e.g. New York).

RID has previously run legal specialist certification, but in 2016, they announced that this would be "sunset". This is expected to be problematic in states where court interpreters are legally required to hold RID Specialist Certification: Legal (SC:L).

RID also runs certification examinations for Deaf Interpreters. There is currently a moratorium in place on testing, but the CID test will resume in 2018.

CPD is mandated to maintain certification: interpreters are required to complete 80 hours of CPD over a 4-year cycle.

69 http://ccie-accreditation.org/accredited-programs/
70 https://myaccount.rid.org/Public/Search/Organization.aspx

5.3.3 The UK

The population of the UK is 65m and it is home to an estimated 70,000 sign language users. British Sign Language (BSL) has legal recognition in Scotland (BSL-Scotland Act 2015[71]), and some recognition in other parts of the UK (Wheatley and Pabsch 2012; See also Northern Ireland Department for Communities[72]). The UK comprises a number of organisations representing interpreters, Deaf communities, and a number of voluntary registers. In Scotland, the Scottish Association of Sign Language Interpreters (SASLI)[73] holds the register, while the NRCPD[74] is the register that a seeming majority of BSL/English working in England, Wales and Northern Ireland associate with.

5.3.3.1 Scotland

Scotland has a population of just over 5 million people, and an estimated 5,000 deaf British Sign Language users (Wilson and McDade 2009). SASLI offers registration at "Registered" and "Trainee" levels on their voluntary register of interpreters. Applicants seeking to become members must hold interpreting and sign language qualifications to meet the entry criteria specified in the Registration Policy[75] at the time of application. They are also required, before registration, to complete a Skills Check, to identify areas of strength to maximise upon, and also areas that may require further work, which are then incorporated into their Continuing Professional Development programme. Registered Members are permitted to carry out all types of interpreting assignment and are required to abide by SASLI's Code of Conduct and Professional Practice Policy. Trainee Membership is offered to applicants who have achieved some, but not all, of the entry qualifications for registration. They must indicate that they are working towards full registration before trainee membership is awarded. Trainee Members are normally granted two years after registration to achieve Registered Membership. SASLI encourages Trainee members to work with registered and experienced interpreters, who may also act as co-workers, supervisors and/or mentors to increase practical interpreting experience in different interpreting assignments.

SASLI suggest that the benefits of registration include recognition of competence to carry out interpreting jobs, an indication that competence and commitment to interpreting have been assessed by sign language and interpreting-related professionals, acknowledgement that a candidate's competence and skills met SASLI's quality assurance standards and entry criteria required at the time of registration as well as offering increased opportunities to gain work[76]. Further benefits include access to SASLI's training provision to enhance continuing professional development and opportunities to network with similarly qualified and experienced interpreters. Registered members can also draw advice and support from SASLI and secure professional indemnity insurance cover. Some 50+ interpreters are listed on the SASLI website, with a majority listed as full members. Wilson and McDade (2009) note that in Scotland, BSL/English interpreters work across a range of domains rather than specializing in, for example, legal or medical work. This, they note, is partly a result of supply and demand metrics: the insufficient supply of interpreters has led to government investment in interpreter education. There is now a 4-year IEP in place at Heriot Watt University and this, as we shall see below, is accredited by the NRCPD[77].

71 http://www.legislation.gov.uk/asp/2015/11/2015-10-23
72 https://www.communities-ni.gov.uk/articles/sign-language
73 http://www.sasli.co.uk
74 http://www.nrcpd.org.uk/index.php
75 http://www.sasli.co.uk/register/how-can-i-register/
76 http://www.sasli.co.uk/register/benefits-of-registration/
77 See also: http://www.nrcpd.org.uk/news.php?article=136

5.3.3.2 UK - NRCPD

Across the rest of the UK, the NRCPD register is the main point of reference for interpreter regulation. NRCPD evolved from the Council for Advancement of Communication with Deaf People (CACDP)[78]. CACDP established the first register of sign language interpreters in 1982. Holders of the Deaf Welfare Examining Board's (DWEB) qualification became founder members of the Register of Interpreters, which saw 112 DWEB holders and 9 CACDP qualified interpreters become members of the first register. As DWEB holders were required to achieve CACDP's highest level examination within five years to remain on the register, the number of registered interpreters fell sharply to just 62 in 1987. In the interim, the number of registered professionals has grown steadily and NRCPD suggest that the positive impact of registration on standards of sign language interpretation became clear in the 1990s (though no empirical evidence is offered to support this assertion). NRCPD report that with the increase in numbers of registered sign language interpreters, it became increasingly clear that there was a need for independence in matters of policy and professional standards[79]. As a result, CACDP passed governance of the register to a the Independent Registration Panel (IRP), an independent body, in 2002. The IRP commenced the administration of the Register of BSL/English Interpreters in England, Wales and Northern Ireland in April 2002. In August 2006 an independent body called the ACE/Deafblind Registration Panel was established to administer the registers of lipspeakers, speech to text reporters and interpreters for deafblind people. This panel added a register for electronic and manual notetakers in 2008. A consultation report, "The Future of Registration" (2008), made recommendations for the establishment of a single registration body which would adopt common policies and professional standards for all disciplines. Following from this, the Independent Registration Panel and ACE/Deafblind Panel were disbanded and, on 1 January 2009, the National Registers of Communication Professionals working with Deaf and Deafblind People was established. The operations and responsibilities of both previous panels were adopted by the new board of NRCPD.

There are currently 1214 interpreters/translators registered at some levels with the NRCPD across all sub-categories. NRCPD registers Deafblind interpreters, lipspeakers, notetakers, sign language interpreters, sign language translators and speech to text reporters. For each of these categories, a number of courses are accredited, offering educational pathways to registration. For sign language interpreters, NRCPD expects competency in a language native to the UK and Ireland and a second signed or spoken language. Candidates must also hold a qualification from one of the accredited IEPs[80]. Candidates can also register as regulated Trainees. Regulated trainees can be either Trainee Sign Language Interpreters (TSLI) or Trainee Sign Language Translators (TSLT)[81].

Trainee Sign Language Interpreter (TSLI) status is available to people who are undertaking an approved IEP or an approved development plan leading to registered status. They must also meet the requirements set out in the National Occupational Standards for Trainee Interpreters (NOS[82] TINT), which requires that they demonstrate level 6 ability in their first language and demonstrate Level 4 ability in their second language. Further, they must demonstrate sufficient interpreter training or experience to be aware of developing professional competence boundaries.

78 http://www.nrcpd.org.uk/history
79 http://www.nrcpd.org.uk/history

80 A full listing of accredited courses for IEPs and sign language translators can be seen at: http://www.nrcpd.org.uk/approved-courses
81 http://www.nrcpd.org.uk/becoming-a-regulated-trainee
82 http://wiki.settlementatwork.org/uploads/UK-National_Occupational_Standards_for_Interpreting.pdf

Candidates must be assessed and 'endorsed' by a RSLI as meeting the requirements set out the NOS TINT. The RSLI must be a qualified assessor or verifier. TSLIs must be supervised throughout their training, and must have an appointed supervisor, whose role it is to monitor progress and (if applicable), oversee work on a candidate's approved development plan and act as a point of contact for the candidate with the NRCPD vis-à-vis candidate performance. Regulated Trainees must also abide by the Code of Conduct, hold an enhanced disclosure certificate less than 3 years old and hold appropriate professional indemnity insurance. TSLIs are allowed a maximum of four years (three renewals) as a Regulated trainee sign language interpreter.

TSLIs may not work in the criminal justice system or mental health settings and must exercise caution when accepting work in a social care setting. NRCPD can place further restrictions on a regulated Trainee's practice should their competence to work in particular domains be called into question. Trainee Sign Language Translator (TSLT) status is available to candidates who are undertaking an approved sign language translator training course and who are supervised throughout their training and endorsed by a Registered sign language translator as safe to practice as a TSLT.

A detailed breakdown of interpreters on the NRCPD register as of July 2016 can be seen in Table 9 below. We can also see that while NRCPD offers registration to those in the Republic of Ireland (Eire), no-one currently is listed with them for this jurisdiction. For Northern Ireland, there are 26 sign language interpreters registered and 2 listed as Trainee SLIs.

Table 9: NRCPD Register figures for interpreters, July 201683.

Region	Deafblind Interpreter	Sign Language Interpreter	Sign Language Translator	Trainee SLI	Trainee SLT
East Midlands		106	1	16	
North West	1	126		27	
South East	1	166	3	33	
North East		29	1	3	
South West	1	71		23	
Strathclyde	3	24		4	
West Midlands	4	102	1	69	
East of England	2	68	2	22	
London	1	95	3	23	
Central Scotland		15		4	
Northern Ireland		26		2	
Wales		41	3	4	
Yorkshire & the Humber		67		13	
Grampian		1			
Highlands & Islands		3			
Lothian & Borders		1			
Tayside		1			
Dumfries & Galloway				1	
Eire					
Total	13	942	14	244	

83 http://www.nrcpd.org.uk/news.php?article=134

NRCPD obliges registered interpreters to complete 24 hours of continuing professional development per year. This must include at least 12 hours of structured activity. Interpreters must log their activity and keep evidence of their work. They must also comply with audit requests from NRCPD with respect to their CPD logs[84]. Structured activities can include attending a training course, workshop, seminar, webinar or similar; attending a conference or AGM that has stated learning outcomes; completing a qualification; and being formally supervised, coached or mentored (with written feedback). Unstructured CPD can include providing or receiving mentoring, coaching or supervision, shadowing a colleague, private study, using and reflecting on new knowledge or skills, getting and reflecting on feedback from clients or other professionals. It can also include attending meetings of communication and language professionals to discuss practice, observing other professionals at work, attending a conference or AGM that doesn't have stated learning outcomes, watching a demonstration or reading relevant articles, text books, reports, research papers and similar. Unstructured CPD also takes into account work completed in researching and writing an article, paper, book or section of a book and similar, preparing for assignments, involvement with an association or other activity that helps develop the profession, and the development of a training course, workshop, seminar or similar.

In addition to administering the registers outlined above and monitoring the CPD logs of those on the registers, NRCPD also provides a concerns and complaints procedure. Individuals/ organisations can raise a concern about the conduct of a registered interpreter ("the Registrant", in their terms) or a regulated Trainee. NRCPD notes that how the concern is handled will depend on information provided to them. They say they may investigate further, have an informal talk with the Registrant or regulated Trainee; record the concern in case more concerns are raised about the same person; or decide the Registrant/ regulated Trainee did nothing wrong[85]. They also provide detailed information concerning their complaints procedure[86]. Complaints can be submitted in English or in a signed language. Complaints are only accepted if they meet certain criteria:

1. Complainant must submit their name and contact details;
2. The complaint must relate to a Registrant or regulated Trainee;
3. The complaint is submitted within six months of the event, unless there is a good reason for a lengthier delay;
4. The complaint illustrates that the Registrant or regulated Trainee didn't act in accordance with the Code of Conduct;
5. The complainant has provided sufficient evidence to proceed with an inquiry.

Further, NRCPD offers mediation services to resolve complaints. They note that "Mediation may be appropriate for some complaints. If we think it is, we will ask you and the Registrant or regulated Trainee you have complained about if you agree to mediation. You will be given the right information to help you make your decision…. You and the Registrant or regulated Trainee must both agree to mediation. If one or both of you don't agree, the complaint will be considered by a committee." (NRCPD Factsheet: Mediation[87]) The "raising a concern" and mediation service seem like a very sensible mechanism for managing issues arising, without automatically invoking a formal complaints process. (Indeed, BSL/English interpreters whom we talked to while compiling this document reported that they liked this incremental process.)

84 http://www.nrcpd.org.uk/documents/misc/nrcpd_cpd_handbook_2015.02_v1.5.pdf

85 http://www.nrcpd.org.uk/raise-a-concern

86 http://www.nrcpd.org.uk/make-a-complaint

87 http://www.nrcpd.org.uk/make-a-complaint

One of the other questions that arises is reciprocal recognition of qualifications (e.g. between SASLI and NRCPD). While we understand that there had previously been a reciprocal arrangement in place to recognise SASLI registered interpreters, it is not clear whether this arrangement remains in place. It appears that, at present, the NRCPD will only accept those who have completed one of their approved courses to register.

Another registration pre-requisite for both SASLI and NRCPD TSLI and TSLTs is akin to Police Vetting. SASLI require a Disclosure - is document containing impartial and confidential information used by employers to hire employees.

Key issues:

BSL is formally recognised – most clearly in Scotland via the BSL (Scotland) Act 2015, but also has had "recognition" from the British government in Westminster; further, BSL and ISL are recognised via the Good Friday Agreement (since March 2004) in Northern Ireland.

Registration is currently voluntary across the UK.

There are pre-requisites in place for registration.

Candidates who complete accredited courses can become members of the register without further testing. For some courses, candidates are required to furnish additional evidence. This applies to BSL/English interpreters, sign language translators, and deafblind interpreters.

Candidates can be registered as Trainee Sign Language Interpreters or Trainee Sign Language Translators.

No legal or medical specialist examinations are currently in place.

There are several registers in place across the UK, with the largest being the NRCPD.

NRCPD is currently working towards statutory registration.

CPD is mandatory across the UK.

There is scope for us in Ireland to explore a reciprocal arrangement with NRCPD regarding recognition of registered interpreters.

Police Vetting is required.

A concerns and complaints process is in place, with mediation offered as part of the process.

6. Emerging Patterns

From this overview, we can see that there are diverse responses to the question of certifying interpreters internationally. Three possible patterns emerge: (i) certification by a professional association (often in partnership with a Deaf organization/ consortia of stakeholders); (ii) certification by a government; and (iii) certification by an academic institution. Certification by a professional association is strongest in common law countries, whereas certification by a government body is usually employed in civil law countries. Academic programs exist in both civil and common law countries, and are particularly strong in countries where certification is not offered by the government or professional associations' (Stejskal 2005: 3).

> "In some countries, typically Anglophone countries of the New World and countries in East Asia, there are governmental or semi-official bodies that administer and usually also conduct testing for the awarding of certification (or 'accreditation' or 'registration') to T&I trainees or practitioners who can demonstrate minimum standards of ability and practice. In other countries, professional bodies take the responsibility of awarding the credential; and in others, such as Argentina for legal translators, there is a very highly regulated system where translators complete a formal degree in legal translation (of up to five years), register with a registration board and become government certified" (Hale 2012: 30).

With regard to spoken language interpreting, most countries provide both a generalist and specialist tests as well as some training, which usually relates to court and/or medical interpreting, sometimes also conference interpreting, terminology and/or technical translation. However, for sign language interpreters, where testing processes are in place, the tendency is towards the provision of entry level generic certification processes. In many places, the route to registration is via an accredited IEP.

This reflects Hale's (ibid.) reflection that there are fundamental differences in the underlying purpose of certification tests offered internationally. For example, in some countries, certification is granted to experienced practitioners, in other words, it is not an entry-level credential, but a recognition of high standing in the profession. As we have seen, this is the case for sign language interpreters in Canada, where AVLIC's Certificate of Interpretation is seen as a hallmark of higher order competency rather than as a threshold test marking entry to the profession.

Having considered the range of approaches to occupation regulation, another question that presents itself is why pursue occupational regulation at all.

7. Occupational Regulation

"…employers tend to underrate the level of interpreters required, just as they have, over the past twenty five years underrated the need for interpreters of any kind" (Committee on Overseas Professional Qualifications 1977:[88] 3)

Thus far, we have been concerned with the issue of how interpreting is regulated internationally, and what approaches might best fit with the Irish context. One of the questions that we have not yet considered is the impact of registration (be this accreditation, certification, licensing, etc.).

Angellelli and Jacobson (2012: 4) note that "There is a lack of empirical research on both translator and interpreter competence and performance, and on assessing processes and products for different purposes, i.e. those of interest to industry, pedagogy and research. In addition, little has been published on the high-stakes certification programs and standards that exist in different countries: assessments seem to be conducted in a vacuum, and the processes involved need to be accurately described in order to assure transparency."

We can add that given the limited clarity regarding assessment protocols associated with certification in most countries, it is perhaps unsurprising that there is no data available (that we could find) that examines the impact of registration of sign language interpreters. This is a significant gap. However, it is not unique to interpreting.

The UK Commission for Employment and Skills (UKCES) (2011: 172) make the same point in a much more generalised manner, stating that there is "a paucity of evidence on the prevalence, operation and impact of occupational regulations in most EU countries, including the UK". Drawing on US based evidence, they note that, "…in general, occupational licensing increases the wage of licensed workers, reduces employment growth and raises the price of goods or services but without any overall improvements in the quality of service or product offered". They argue that there is very limited evidence from the US regarding the impact of occupational regulation on skill levels or the propensity to engage in job-related training. At the same time, they point to evidence that suggests that when minimum threshold levels of training and qualifications have been introduced, there has been some effect for those in what were "lower skilled occupations" like care work. They warn against cases where occupations have implemented new skill standards that are too low (or where the barriers to accessing these have been too high) to result in any substantial upskilling of the relevant workforce (e.g. the licensing of private security guards in the UK).

In the UK, circa 31% of all jobs require licenses for practice. Some 3% of roles have recourse to statutory certification and up to 6% require registration. A further estimated 19% of occupations have accreditation routes open to them and professional occupations are the most likely to be regulated. Indeed, professional occupations are most likely to be subject to licensing requirements. UKCES (2011) go on

88 http://parlinfo.aph.gov.au/parlInfo/search/display/display.w3p;db=CHAMBER;id=chamber%2Fjournals%2F1977-06-03%2F0008;query=Id%3A%22chamber%2Fjournals%2F1977-06-03%2F0023%22

to note that regulated occupations are more likely to be held by men than women; 87% of licensed job holders are male (UKCES 2011). They also point out that those who are licensed tend to be older (reflecting the additional time it takes to secure required qualifications and/or experience).

There are also policy implications arising from regulation. Forms of occupational regulation, such as licensing, certification and accreditation clearly have the potential to raise average skill levels in an occupation like interpreting; indeed, this is at the heart of every systematic attempt to establish a register of interpreters – voluntary or statutory – that we have looked at. To raise skill level, new incentives must be put in place for workers or firms – the benefits of regulation must be made clear to all stakeholders. As the UKCES report notes, the incentives are clearly strongest – and more equally felt by both workers and firms – in the case of licensing (2011: 168).

They go on to argue that "At the heart of any policy on whether or not to regulate an occupation is a trade-off between the potential benefits of occupational regulation and its potential costs. Those benefits can include a more highly skilled labour force, at least in the regulated sector, improvements in quality of goods or services provided in the regulated sector, and welfare benefits for the regulated sector in terms of wages and profits. The potential downsides include possible negative spill over into the unregulated sector of the labour market, such as the depression of wages in adjacent labour markets due to labour supply shocks, and a diminution in the number of providers". (2011: 169)

They also point out that if policymakers or employers believe there is a strong *prima facie* case for regulation of a particular occupation, the other issue is how to regulate that occupation.

Echoing Hale (2012), they say that "this raises questions about the design of the regulation (e.g. whether any skill standard should be mandatory or voluntary; at what level the skill standard should be set; whether the regulatory scheme should be aimed at employers or individuals; whether the renewal of licences should be conditional upon evidence of further training etc.). It also raises questions about its governance (e.g. who is empowered to regulate; how and when the scheme should be monitored for its fitness for purpose etc.). These major design factors can be crucial in determining the actual effects of regulation." (UKCES 2011: 168).

Further, it is important to recognise that there is a 'political' element to occupational regulation. The UKCES note that those with a vested interest in ensuring that an occupation becomes regulated may use their political capital to create a monopoly. This, they suggest, is most likely to occur where the members of the occupation play a pivotal role in determining entry standards. Thus, vested interests may manifest themselves in unnecessarily restrictive skill demands to enter the occupation.

8. Policy Considerations & Recommendations

Two policy considerations emerge from the discussion in Section 7:

(1) Is there a *prima facie* case for regulating a particular occupation – in our case, sign language interpreting?

(2) If we answer, 'yes' to (1), how should Ireland go about creating, enforcing and monitoring the regulation?

Based on the discussion in this document, there is evidence that internationally, sign language interpreting is becoming increasingly regulated. In countries where interpreter education has been in existence since the 1960s and 1970s, we see restructuring of registration protocols (e.g. USA, Canada, and Sweden) that take account of shifts in educational pathways to interpreting. For example, in the USA, the RID introduced a requirement that all prospective interpreters must hold a BA degree prior to taking the NIC test, which became a requirement from 2013. For CDIs, this requirement will be enforced from 2018. Such shifts in minimum entry requirements seek to raise the standard of work product.

Also responding to educational change, in Europe, the European Forum of Sign Language Interpreters (efsli 2013a) published minimum standards for entry to the profession, predicated on the move towards formal, university based training to BA level. They also aim to quantify the interpreting community's criterial standards for IEPs. Some work is now in progress to explore how aspects of the efsli standards have been transposed into IEP curricula across Europe (Leeson, Monikowski and Haug, in prep).

Revisions to registration protocols are often coupled with increased statutory recognition of sign languages, and what appears to be a commensurate trend towards statutory regulation. These moves are reinforced by calls for the establishment of registers of interpreters in international documents like the European Directive 2010/64/EU. As Stejskal (2005) has noted, the establishment of statutory registers seems most likely in non-common law countries, while common law countries tend towards voluntary registers.

For all of these reasons (our common law heritage, the current lack of formal recognition of ISL, the small number of interpreters we are considering (i.e. a question of critical mass coupled with available resources) and given changes to interpreter education pathways in Ireland over the past 20 years), we make the following recommendations:

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)[89]. 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.

89 http://www.ecml.at/ECML-Programme/Programme2012-2015/ProSign/tabid/1752/Default.aspx

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 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.

The thrust of the recommendations, as they apply to interpreters seeking registration, can be seen in Table 10. We appreciate that these are notional in nature, and emphasize that they are intended as a skeleton outline, and as a starting point for discussion.

The focus of these recommendations is on the establishment of a voluntary register that facilitates registration of those meeting entry-level requirements for practice. At a later stage, the issue of specialist registration might be considered, particularly with respect to interpreting in legal settings, and interpreting in health care settings. It will be essential to ensure that a robust plan of action is set in train, with buy-in from the key stakeholders. It would be helpful if both stakeholders and publically funded bodies commit to recognizing the register and employing interpreters who are members of the register, a strategy that seems to be impactful in other jurisdictions. It is clearly essential to have a timeline for planning, consultation, implementation and review. Like assessment itself, the process of registration is cyclical in nature and will require drivers to propel and manage the process over multi-annual iterations.

Table 10: Proposed Skeleton for Registration of Interpreters in Ireland

Deaf Interpreters/ Deafblind Interpreters	*(a) Complete an accredited IEP* *OR* *(b) complete training provided by the independent registration board.* *If (b), then, candidate must also successfully complete criterion-referenced testing protocol.*	*Maintain membership of interpreting association.* *Provide evidence of work practice (***12 assignments or 12 hours per year over a three-year period (36 assignments or 36 hours in total)*** *Complete CPD (***30 hours of CPD over a three-year period)*** *Maintain indemnity insurance.* *Provide updated Garda Vetting documentation on request.*
Trained candidates	*Complete an accredited IEP.* *These will include:* » Bachelor in Deaf Studies (Interpreting) – Trinity College Dublin » NVQ Level 6 (Signature) » MA in Interpreting Studies (Queens University Belfast) » *The independent registration board may also wish to recognise Sign Language Translator courses accredited by the NRCPD.*	*Maintain membership of interpreting association.* *Provide evidence of work practice (***12 assignments or 12 hours per year over a three-year period (36 assignments or 36 hours in total)*** *Complete CPD (***30 hours of CPD over a three-year period)*** *Maintain indemnity insurance.* *Provide updated Garda Vetting documentation on request.*
Holders of Diploma level interpreting qualifications/ previously registered with Irish Sign Link/ SLIS		*Maintain membership of interpreting association* *Provide evidence of work practice (***12 assignments or 12 hours per year over a three-year period (36 assignments or 36 hours in total)*** *Complete CPD (***30 hours of CPD over a three-year period)*** *Maintain indemnity insurance.* *Provide updated Garda Vetting documentation on request.*
Pre-Registration Requirements	» Garda Vetting » Membership of an interpreting association » Indemnity Insurance	

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10. Appendix 1

The complete NAATI logbook for the record-keeping of interpreting work practice and revalidation professional development activities can be seen at: https://www.naati.com.au/media/1377/cp_logbook_for_interpreters.pdf. The cover page includes the following guidelines.

REVALIDATION WORK PRACTICE LOGBOOK FOR INTERPRETERS

FOR INTERPRETING WORK UNDERTAKEN BETWEEN:	/ / **AND** / /		
NAME:		**NAATI NUMBER:**	
LANGUAGE OTHER THAN ENGLISH (LOTE):			
	(NOTE: Use a separate Logbook for each language practised)		

To meet the requirements for revalidation you must complete as a minimum an average of forty assignments per year, 120 assignments over the three years.

An assignment is defined as any interpreting completed ranging from less than one hour to a maximum of one day. If an assignment involves multiple days, each day should be recorded as a separate assignment.

Interpreters who meet the minimum number of assignments before the end of the three-year period should continue to keep records of their assignments until the end of the three-year period.

Acceptable evidence of work practice:

1. **Proof of employment as an interpreter**
   *Please provide an original signed letter from your employer(s) on company letterhead. The letter must clearly state you by name and NAATI number. It must clearly state the period of employment, proportion of overall duties that interpreting formed, the language(s) and situations in which interpreting was performed and the regularity of interpreting work **in each language** during employment.*
2. **Proof of assignments completed from a service provider**
   *Please provide an original signed letter from the service provider on company letterhead. The letter must clearly state the language(s) in which interpreting was undertaken, the number of assignments completed **in each language** and the period over which these assignments were completed.*
3. **Summary of assignments completed**
   Please complete pages 2, 3 and 4 of this document.

NAATI will accept any combination of 1, 2 and/or 3 as evidence of meeting the minimum requirement of 120 assignments. **Pages 1 and 4 of this logbook must be completed and signed with all evidence provided.**

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11. Appendix 2

Example of how RID CEU points are logged at a conference. Participants collect stickers for each event they attend. These are appended to your conference CEU Training Booklet. The barcodes are scanned by conference organisers and the points are added to your RID profile, which you can check online.

Thursday, May 1, 2014

Time	Title	Place Sticker
Session #1: 6:30-9:00 pm	Interpreting Suspect Statements to the Police- Witter-Merithew	Suspect Statement to the Police 0294.0514.01 PS 0.25 CEUs

Friday, May 2, 2014

Time	Title	Place Sticker
Session #2: 9:00 am -12:00 pm	MAIN SESSION: SPEAKERS PANEL #1	Main Session-Speakers Panel 0294.0514.02 PS 0.3 CEUs
Session #3: 1:30-3:00 pm	❑ Unpacking Privilege – Storme ❑ Perception Conflicts- Mathers ❑ Transforming Perspectives-Bowen-Bailey ❑ Strategic Partnership-Wagner	What Sign Lang. Interps. Can Learn Session 2 0294.0514.05 PS 0.15 CEUs
Session #4: 3:30-5:00 pm	❑ Unpacking Privilege – Storme ❑ Perception Conflicts- Mathers ❑ Transforming Perspectives-Bowen-Bailey ❑ Strategic Partnership-Wagner	Sign Lang. Interps.-Unpacking Privilege Session 2 0294.0514.04 PS 0.15 CEUs
Session #5: 7:30-9 p.m.	ASL SLAM-Ridloff At Texas School for the Deaf	

Appendix 3

11/16/2013	Maintaining the Whole Interpreter	PS	0.6000	Albuquerque NM
3/28/2014	International Research Symposium: Session 60	PS	0.1000	Washington DC
3/29/2014	International Research Symposium: Session 67	PS	0.1000	Washington DC
3/30/2014	International Research Symposium: Session 72	PS	0.1000	Washington DC
6/21/2014	Strategies to Enhance:Marking/Discourse (present)	GS	0.7000	Las Cruces NM
7/7/2014	AVLIC 2014	PS	0.9750	
1/16/2015	Mental Rotation of Space: A Pragmatic View...	PS	0.2750	Rochester NY
3/7/2015	The Path from Deaf Disempowerment to True Allies	PS	1.0000	Albuquerque NM

CEUs	Required	Earned
PS CEU	6.0000	8.7000
GS CEU	0.0000	1.1000
Total CEU	8.0000	9.8000

Example of how RID CEU statements are presented.

[PS = Personal Studies, GS=General Studies].