

# **Independent Technical Review of Qualifications and Experience Requirements for the Provision of Spoken Language Interpreting**

**For Ministry of Justice**

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# Review of Qualifications and Experience Requirements for Spoken Language Interpreting

## LIST OF ABBREVIATIONS

ACCA	Association of Chartered Certified Accountants
AIT	Asylum and Immigration Tribunal
ALS	Applied Language Services
APCI	Association of Police and Court Interpreters
BA	Bachelor of Arts
BSc	Bachelor of Science
CAE	Cambridge English: Advanced
CAFCASS	Children and Family Court Advisory and Support Service
Capita TI	Capita Translation and Interpreting
CCI	Certificate in Community Interpreting
CEFR	Common European Framework of Reference (for languages)
CIM	Chartered Institute of Marketing
CIMA	Chartered Institute of Management Accountants
CIOL	Chartered Institute of Linguists
CIOLQ	CIOL Qualifications
CJS	Criminal Justice System
CPD	Continuing Professional Development
CPE	Cambridge English: Proficiency
CPS	Crown Prosecution Service
CVP	Cloud-Video-Platform
DCI	Diploma in Community Interpreting
DPSI	Diploma in Public Service Interpreting
EQF	European Qualifications Framework
ESOL	English for Speakers of Other Languages
GCSE	General Certificate of Secondary Education
HMCTS	Her Majesty's Courts and Tribunals Service
IAA	Immigration Appellate Authority (later AIT)
IELTS	International English Language Testing System
IND	Immigration and Nationality Directorate
IOL	Institute of Linguists (later CIOL)
ISO	International Standards Organisation
ITI	Institute of Translation and Interpreting
MA	Master of Arts
MoJ	Ministry of Justice
NAO	National Audit Office
NATO	North Atlantic Treaty Organisation
NOS	National Occupations Standards
NPCC	National Police Chiefs' Council
NPS	National Probation Service
NRPSI	National Register of Public Service Interpreters
NQF	National Qualifications Framework
NVQ	National Vocational Qualifications
OFQUAL	Office of Qualifications and Examinations Regulation
PACE	Police and Criminal Evidence Act
PAIT	Police Approved Interpreter Translator
PPS	Public Prosecution Service
PSI	Public Service Interpreting/Interpreter
QCF	Qualifications and Credit Framework
RIBA	Royal Institute of British Architects
RQF	Regulated Qualifications Framework
SOMI	Society of Metropolitan Police Interpreters
STANAG	Standardized Agreement (6001 – languages)
TQUK	Training Qualifications UK
TOEFL	Test Of English as a Foreign Language
UKVI	UK Visas and Immigration

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# Review of Qualifications and Experience Requirements for Spoken Language Interpreting

## EXECUTIVE SUMMARY

This report, undertaken between March and September 2022, reviews the technical qualifications and experience requirements for spoken language interpreters deployed on MoJ assignments. It is part of a wider policy review of language services commissioned by Lord Wolfson in early 2022 following concerns raised by the profession about the standards of interpreting in courts. Proposals for a new qualifications framework are included in a separate annex.

Requirements for Welsh language interpreting are excepted from the review as separate arrangements apply under the partnership between Cymdeithas Cyfieithwyr Cymru, HMCTS Welsh Language Unit and the Judiciary in Wales.

### Frameworks and standards

Language professionals engaged to work on assignments provide a professional service in a specific field of the wider language profession, namely interpreting. Those who are fully trained and qualified to work as ‘interpreters’ should be referred to by this title rather than by the more generic ‘linguist’.

National and international legislation sets out the governance for the provision of interpreting services to protect the public and to ensure due process in legal and court proceedings.

The national Regulated Qualifications Framework (RQF) sets RQF Level 6 as the knowledge and skills level for professional work. This is equivalent to a university bachelor’s degree, a degree apprenticeship and the highest NVQ qualification. National and international language and interpreting standards set out more precise frameworks for sector-specific skills at this level.

Professional interpreting standards for public service, and in particular legal, settings have been in place since the 1990s and were established jointly by the language profession and judiciary through the Nuffield Interpreter Project. These are aligned to national and international frameworks and describe qualifications and experience requirements for interpreting professionals.

The profession benefits from a Royal Charter requiring its holder, CIOL, to work on behalf of the language profession, in the public interest, to set and uphold professional standards. Since 1989 its Diploma in Public Service Interpreting (DPSI) has set the public service interpreting standard and provided for sector-specific qualification at professional level. More recently further professional qualifications at the same level have been developed and are now available.

A lower standard governs interpreting in the community, primarily with the aim of maintaining standards in interpreting within services that enhance access for non-English speakers to the wide range of public services. This standard is set at RQF Level 3 and does not include the training and testing of police and justice-specific knowledge.

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These standards are respected by professional bodies, membership bodies and the voluntary regulator for the sector and recognised within public service organisations. They are reflected in criteria for different levels of professional memberships and are used by the voluntary regulator for registration to provide an assured source of professionally qualified and experienced public service interpreters.

The standards have been widely utilised across public bodies and government departments for many years, most recently in the creation of a new national scheme for the accreditation of interpreters and translators by the police service.

### Qualifications requirements

Public service interpreting has standard-specific qualifications that certify an interpreter's ability to perform effectively and efficiently at the above professional standard (DPSI, DPI, DCI). These professional qualifications provide specific assessment of the modes and techniques of interpreting required in legal settings.

The profession also benefits from a lower standard in community interpreting, with related qualifications. Holders of these qualifications have foundation level interpreting skills and knowledge of wider public service settings but does not include legal. Specifically the skills of reading and writing and the ability to interpret simultaneously are not tested.

The current list of qualifications for interpreter registration with MoJ do not clearly differentiate between these two standards, in part due to requirements being based on the characteristics of assignments and language groupings rather than on the competences of the interpreter. The need to provide a service, mandated by legislation, across a wide range of core and rare languages has led to different standards being applied to different languages.

This unclear differentiation between standards is a key concern of the interpreting community and has diminished public service interpreters' willingness to engage with the MoJ contract. It has resulted in the profession perceiving that professional standards are at best being eroded, at worst ignored.

A revision to the requirements based on core interpreter competences (proven language skills, technical interpreting ability and knowledge of legal contexts and terminology) would provide a framework that can be aligned to professional and community standards, providing greater clarity and transparency. Qualifications that do not meet the minimum standard pre-professional standard should not be included on the framework.

Although no evidence has been seen to suggest that current arrangements are seriously compromising the quality of interpreting service provided, there is potential scope for that to happen. New, more clearly defined requirements would introduce a baseline assurance of interpreter performance, which

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is not currently the case, and would allow for targeted control and monitoring of deployments where, in exceptional circumstances, formal requirements cannot be met.

The withdrawal of a major awarding organisation from the vocational and professional qualifications market is a particular concern and needs to be closely monitored. *[Note: Since this report was completed in June 2022, TQUK's portfolio of interpreting qualifications has been transferred to iCQ (icanqualify)].*

### Experience requirements

Practical experience is a critical component of learning, development and qualification. The quality of MoJ's language service delivery is dependent on interpreters who understand the legal system and its constituent court structures, are familiar with the workings of courts and tribunals and have mastered the specialist terminology needed to deliver efficient and effective interpreting.

The acquisition of such experience has its challenges in a largely independent sector where freelance working is the norm. The sector structure does not provide for typical experiential learning acquired through arrangements such as internships or placements that are a normal part of employed environments. While some interpreters come to the profession with previous experience, those emerging from educational study need opportunities to gain experience in safe and protected environments before full engagement with legal work.

Interpreters can find it difficult to evidence experience in a meaningful way for work undertaken through agencies on contracted-out services. Commercial confidentiality can restrict the amount of data language service providers are prepared to release, which is often limited to practical details such as hours and type of work rather than any evaluation of quality.

There is a widely recognised experience level of 400 hours of interpreting practice which has been the professional standard for many years. The basis for the standard is not formally documented but originates with the Chartered Institute of Linguists/National Register of Public Service interpreters and is now a common measure of professional capability. This level of experience can be hard to achieve in the context of MoJ and the need for legal experience, particularly in rare languages where demand can be extremely low. Redefining experience to include other aspects of an interpreter's work might help to address this. Activities such as the acquisition of new specialisations and terminologies for particular areas of work are a natural and recognised part of interpreter competence. In the MoJ's complex service delivery setting, experience requirements should be flexible enough to provide for the multiplicity of languages and set at a threshold which is achievable for all languages, whether offered in combination with qualifications or on an experience-only basis for those languages where no qualification is available.

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Current requirements, in some cases, allow interpreters to provide services with no prior interpreting experience which poses a serious and substantial risk to quality and the due process of assignments and case handling. Experience should be mandatory for all interpreter registrations. Where this cannot be achieved through direct delivery of services or practical deployments in real-life settings, alternative sources of equivalence should be recognised as a substitute. This might include areas such as CPD, specialist training, scenario learning and assessment.

### Rare Languages

The current rare language definition, “a language in which there is no DPSI”, has the potential to stigmatise such languages and is no longer relevant in a market where alternative professional level interpreting qualifications now exist.

Defining interpreter requirements by core or rare language has led to a blurring of standards with different requirements for different languages and levels. In future all standards and languages should be treated equally with requirements that are flexible enough to allow interpreters to demonstrate their competence in different ways, either through qualification, or experience, or a combination of the two. This is the only option in a service where interpreters are required in over 200 different languages, each of which has distinct cultural and educational contexts.

For rare languages, assessing competence is a very particular challenge and managing this in the context of established professional and community standards requires an alternative approach. This may require thinking creatively about new measures of qualification, formal or informal, or thinking differently about how experience can be gained or evidenced. Where this is impossible and in exceptional circumstances where standards cannot be met, an authorised exceptions process might be considered that would provide MoJ with the opportunity for improved risk management and better control and management of such deployments.

A coordinated approach between the MoJ, relevant professional bodies and service providers is needed to encourage rare language interpreters to take qualifications and to progress from community to professional levels. It is recognised that creating qualifications in new languages is both time-consuming and expensive. However, as in the case of Albanian recently, by working together there is the scope to reduce the rare language list by identifying languages with the greatest numbers of unqualified interpreters and creating a pathway to one of the professional qualifications. This develops the individual interpreter, raises the overall level of professionalism and crucially reduces risk for MoJ.

The current rare language requirements accept qualifications at levels as low as RQF Levels 1 and 2, in some cases with no experience requirement either. These should urgently be revised to exclude qualifications at less than community level (RQF Level 3) unless supplemented by additional experience or CPD/training or combined with an authorised exceptions policy as described. The

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registrations should not be lost, however, as they are a strong source of potential pipeline and holders should be encouraged to progress and develop their skills with the aim of achieving RQF Level 3 qualification.

### Assignment types and complexity levels

Tiering and complexity levels over the course of two contracts have moved interpreting requirements away from the previously recognised professional standard. This has created a level of mistrust and concern within the profession with many public service interpreters leaving or moving to other sources of work.

Current complexity level descriptors are based on exceptions and do not clearly describe complexity or the reasons why assignment types have been designated a particular level.

Aligning assignment types to the national standards at professional and community levels offers clarity for all on the interpreter competences required at each level and would enable better decision-making on bookings. A two-tier system is recommended that reflects these national standards.

The nomenclature used to describe assignment types and interpreter competences is not aligned and is therefore confusing. A 'standard' assignment type is currently serviced by community interpreters who have not yet met the professional 'standard'. There is therefore no common understanding of how well an assignment requirement is matched by an attending interpreter.

Some guidance is available to help staff working with interpreters but a more substantive document with input from both MoJ and the profession would equip bookings staff with improved knowledge and understanding.

There is no documented evidence showing how individual assignment types have been designated to particular complexity levels. Feedback from HMCTS staff suggests that the distribution of assignment types to levels is broadly appropriate and no actual evidence of compromise to quality was reported. The list of assignment types is long and overly complicated listing each type of hearing individually against multiple jurisdictions. It would benefit greatly from simplification.

Data analysis of a limited data set shows that deployments are concentrated on a relatively small number of assignment types and that a very high percentage of assignments are serviced by an interpreter at the designated level or above. However, the level of an assignment can be changed, in most cases downgraded, if an interpreter at the designated level cannot be sourced and this is not always recorded. In cases of downgrading, bookings staff are provided with an interpreter profile, including qualifications and experience, to help with decision-making. Final decisions on acceptance for bookings are also subject to legal considerations such as the urgency of a case, progression timelines etc.



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There are concerns about the rising number of off-contract bookings and the reasons leading to this as well as the number of late cancellations by interpreters. Interpreters choose to accept or decline a booking on a number of factors. Booking forms do not currently provide enough information for interpreters to make an informed decision on acceptance. An improved form with better description of the assignment could address the problem of cancellations. This should include whether an assignment is attended or remote. Adding additional features of the assignment and a brief overview of the case would be helpful in ensuring that an interpreter only accepts offers they are prepared for and competent to complete.

### SUMMARY OF RECOMMENDATIONS

1. Title - the title of *interpreter* should be used in all contexts and documentation when referring to individuals providing MoJ contracted interpreting services.
2. Professional level and standard – the national professional level i.e. RQF Level 6 should be used when defining standards for professional MoJ language services.
3. Qualification standards - MoJ should consider applying:
  - RQF Level 6 as the default level to the provision of MoJ interpreting services for those bookings classified as Professional level assignment types;
  - RQF Level 3 as the minimum standard for those bookings classified as Community level assignment types (e.g. Telephone Interpreting).
4. Minimum standards - Interpreters who do not meet the minimum community standard equivalent to RQF Level 3, or are unable to present suitable equivalent evidence and/or experience, should not be included in the MoJ interpreters' listing.
5. Part-qualified interpreters on MoJ Register - An analysis of interpreter registrations where qualifications are only partially completed should be undertaken to reveal the causes. To consider time-limiting registration until full completion is achieved.
6. Experience levels – Experience requirement to apply to all registrations in all languages at all levels.
7. MoJ technology competence - Interpreters should receive training or CPD on the specifics of the MoJ Cloud-Video-Platform (CVP) and longer term be assessed on remote interpreting as part of the skillset requirements.
8. Experience - (in conjunction with Recommendation 6) Experience requirements should reflect the challenges of delivering a language service in a complex setting where a multiplicity of languages is required. 200-400 hours is reasonable.

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9. Non-qualification/Experience routes - (in conjunction with Recommendation 6) In the context of widely accepted professional experience standards, set an experience requirement that recognises different routes to registration either through qualification plus experience or through experience alone adapted to a complex service delivery environment.
10. Future qualification development - MoJ to coordinate activity with the profession, suppliers and stakeholders to identify rare languages with high numbers of interpreters with the aim of developing qualifications and/or assessments, reducing the rare language list and increasing the number of interpreters with professional qualifications.
11. Rare languages qualification/assessment development - Explore the potential for RQF Level 3 (or equivalent) qualification, or if necessary, a specially prepared equivalent level assessment, to be used to assess the knowledge and skills of all rare language interpreters who do not have formal qualifications at this level to provide a base-line assurance of interpreting service quality.
12. Booking classification - Reduce the current three tier classification of bookings to two tiers, in line with recognised professional and community interpreting standards
13. Terminology - Use common terminology in the new framework, which is aligned to professional and community standards, when referencing both assignments and interpreter requirements to ensure that standards, qualifications, skills and experience are clearly defined and that there is common understanding of the standards by all stakeholders.
14. Guidance - Develop guidance to ensure those requiring and booking interpreters better understand assignment types and interpreter qualification standards.
15. Assignment types - Reduce the number of assignment types to reduce repetition and create a simplified set of criteria where allocation to one of the two standards (professional/community) can be achieved with greater clarity.
16. Management Information - Develop a more comprehensive dataset that includes breakdown by language and booking type, to enable a better understanding of how interpreter requirements, assignment levels and fulfilment work together, and whether quality standards are maintained.
17. MoJ capability and knowledge - MoJ to consider how knowledge and expertise held by bookings officers and managers is managed and retained over time, considering succession planning, recruitment and training and development of new staff.
18. Exceptional and off-contract deployments - To keep a central record of all downgraded, exceptional and off-contract deployments. To develop and implement an exceptions policy to ensure that additional measures can be applied to such bookings and that extra quality assurance processes

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are in place where an interpreter is engaged outside the specified standards, levels and qualification requirements.

19: Booking information - To provide sufficient information of the booking such that an interpreter is able to make a considered decision in accepting and/or preparing for the assignment.

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## INTRODUCTION

### PURPOSE

This review of standards and qualifications, undertaken between March and September 2022, provides technical evidence for the independent review commissioned by Lord Wolfson on spoken language qualification and experience requirements to support the effective delivery of Language Services across the MoJ. The intended outcomes of the commissioned review are

- An independently defined qualifications framework based on the technical interpreting requirements of MoJ assignments.
- A supporting 'implementation strategy' which captures the technical framework and suggests the means of practical application including: associated training needs/standards, operational and cost impacts and implementation recommendations (if required).

The technical review will include an evaluation of the existing qualification requirements for relevance and suitability under the current MoJ 'Language Services (Spoken Languages)' contract; an assessment of the role of experience in creating and measuring the competence of interpreters; a review of MoJ assignment types and different requirements depending on type; and consideration of how rare languages are defined and handled.

Requirements for Welsh language interpreting are excepted from the review as separate arrangements apply under the partnership between Cymdeithas Cyfieithwyr Cymru, HMCTS Welsh Language Unit and the Judiciary in Wales.

### AIM AND OBJECTIVES

The review will evaluate current arrangements in respect of qualifications, experience and rare languages and how they are used in decision-making for the deployment of interpreters to different MoJ assignments. It will:

Provide an explanation of the academic and language frameworks which govern the sector and against which, language qualifications are mapped or aligned.

Describe existing standards relating to professional interpreting services and their rationale.

Provide an explanation and analysis of current qualification requirements, their level and relevance to MoJ assignments. Other qualifications may be considered and included if/where appropriate.

Consider the value of experience in developing and measuring interpreter competence, whether experience can serve as a tool to complement formal qualifications and its role in enhancing professionalism.

Review how rare languages are defined, their status and how supply and standards can be improved.

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Map standards of qualification and experience against MoJ assignment types to determine how scaled requirements might impact deployment strategies.

### BACKGROUND & CONTEXT

The historical path to today's legal processes has resulted in court and tribunal processes with rights and rituals which are largely unfamiliar to the general public and use of language that is often considered arcane and obscure. These complex proceedings can be difficult to follow for English speakers, but for non-English speakers they may quickly become impenetrable. Article 6 of the European Convention of Human Rights (1953) articulated the right of defendants *"to be informed properly in a language which he understands, and in detail, the nature and cause of the accusation against him"*. Additionally, the defendant was *"to have the free assistance of an interpreter if he cannot understand the language of the court"*. The right to an interpreter in court proceedings is an intrinsic part of the right to a fair trial.

It is a principle of English common law that the Defendant must be able to understand the charges made against them and be able to properly defend themselves. Prior to the UK's withdrawal from the European Union, this right was governed by the EU Directive on the Right to Interpretation and Translation in Criminal Proceedings (2010/64/EU of 20 October 2010) but has since been enshrined in UK domestic law. Code C of the Police and Criminal Evidence Act (PACE, 1984) governs similar rights to and use of interpreters within police services. All arrangements for interpreting in legal public service settings must comply with the minimum requirements set out in these laws.

Protection of the public and the safeguarding of due process is paramount and the application of these laws assures equality of access for all to UK judicial services, regardless of their first language. The use of properly qualified and experienced interpreters ensures that poor communication and understanding can never lead to miscarriages of justice and that failures of efficiency or spiralling of costs due to cancelled or delayed trials are prevented. Their use additionally provides strong reassurance for all concerning the level of quality and professionalism that can be expected from an interpreting service upon which fairness and justice depend and which is commensurate with the highly qualified and experienced status of the judiciary alongside whom interpreters work.

Between 1983 and 1991, funded by grants from the Nuffield Foundation, the Nuffield Interpreting Project brought together the judiciary and the language sector to review the training and accreditation of interpreters in public services, specifically in legal, health and social services. Further funding in 1991 supported the development of courses and examinations and the implementation of recommendations that resulted in today's professional qualifications in public service interpreting and the establishment of the National Register for Public Service Interpreters (NRPSI).

The commissioned review, of which this is part, is intended to inform the retendering of MoJ language services from 2023 in the light of ongoing concerns from the profession regarding the decision to

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outsource services in 2012 and the perceived damaging impact this had on the quality and delivery of interpreting services.

### INTERPRETING SERVICES

The Language Services contract is divided into four Lots, the first for Spoken Languages: Face-to-Face and Telephone Interpretation. This review focuses on the interpreter requirement specifically for this service.

Making a clear distinction between *interpreting* and *translation* is important, the latter being the focus of a separate Lot and out of scope of this review. The difference between these two language services is often misunderstood, misused or interchanged by those unfamiliar with the profession. The Chartered Institute of Linguists (CIOL), the UK's chartered body for language practitioners which represents the profession, explains.

An interpreter “*transposes a **spoken** message from one language into another, in one or both directions, accurately, faithfully, in its entirety and maintaining its original sense, meaning and conveying the correct register, to reflect the tone and convictions of the speaker*”. (CIOL Glossary of Terminology, 2019).

A translator “*renders a piece of **written** language from its source language to a target language accurately, faithfully, in its entirety, maintaining its original sense, meaning and style, using all reference materials and technologies available*”. (CIOL Glossary of Terminology, 2019)

MoJ assignments require an interpreter to work bi-directionally with two languages (English plus one other) in spoken contexts where outputs demand both immediacy and absolute accuracy. A high level of competence in both languages is essential as well as the ability to transfer communication fully and appropriately from one language into the other. Interpreters may work in two or more language combinations.

In contrast, translators work with the written word primarily in a single language direction, from their second language (source language) into their first (target language), in contexts where outputs benefit from longer deadlines and with time for research, reflection and revision. Translators are not required to have spoken ability in their source language(s) and may have a passive knowledge of several languages from which they can translate. The language and technical skills required for interpreting and translation are therefore significantly different.

MoJ requires two main modes of interpreting: consecutive and simultaneous. Consecutive interpreting is where a person pauses at frequent intervals while speaking to allow time for their words to be interpreted, before they continue. In simultaneous interpreting the speaker does not pause. The interpreter listens and interprets simultaneously keeping the same time and pace as the speaker. Simultaneous interpreting may also be referred to as chuchotage. Whilst consecutive is the

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predominant form of interpreting required, an MoJ assignment may require the ability to interpret in both modes.

Most MoJ assignments have traditionally been face-to-face, attended events. Interpreting in-person allows for clear lines of communication and robust management of interactions. The interpreter has full sight of everyone present and can read the many non-verbal cues which contribute to full and proper understanding of the intended communication.

Technology advances have extended the use of remote or video interpreting as an alternative to face-to-face in recent years with the coronavirus pandemic acting as a catalyst, increasing the number and range of assignments considered suitable for remote/video interpreting. Handling the physical separation of an interpreter from a venue and from the person/people for whom they are interpreting introduces challenges which are hard to manage seamlessly and effectively. Poor quality connectivity, lack of sight lines, and unfamiliarity with platforms and setups can all impact on the performance of an interpreter. However, where the setup is effective, this mode of interpreting can offer flexibility, with access to interpreters quickly and easily in any part of the country alleviating the need for travel and related costs.

There are two forms of translation that may be required for MoJ assignments and professional interpreters are trained in handling these. Some assignments may require the immediate spoken translation of a written document (sight translation). Sight translation is an in-the-moment oral rendering of a short, written document in another language. Written translation may also be required although any formal, significant, longer translation work should be undertaken by a qualified and experienced translator managed through the MoJ translation Lot designated for this purpose.

### INTERPRETER OR LINGUIST

*“A linguist actively studies, uses or applies more than one language, or their knowledge of languages, academically, professionally or for educational purposes, to communicate or facilitate communication with/between different languages, cultures and communities” (CIOL Glossary of Terminology 2019).*

Language terminology, and specifically the terms used to describe those delivering services, are frequently mixed up or interchanged by those outside the profession. As described above the distinction between interpreter and translator is critical, as is the difference between *interpreter* and *linguist*. It is of crucial difference and importance in relation to MoJ assignments and the nature and quality of the service that can be provided.

From the definition above, a linguist can communicate independently in each language and may sometimes facilitate informal communication between speakers of different languages. They do not, however, have the knowledge or technical skills of an interpreter to switch instantly and effectively between languages or to transfer a given communication fully and accurately from one language to

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the other. A linguist is not trained in the different modes of interpreting and is unfamiliar with related techniques.

An interpreter understands and uses two or more languages specifically for the purpose of transposing a message from one language to another. In addition to language ability, they are trained in and possess additional skills of coding and transfer, are practiced across all interpreting modes and are competent in other techniques that underpin an effective interpreting act.

Interpreting is a recognised profession governed by Royal Charter. An interpreter may be considered a linguist but not all linguists are interpreters or able to perform effectively as such. Interpreters invest in years of education and training specifically in preparation for the practice of their profession. For the purposes of defining requirement, assuring language service quality and encouraging engagement from the profession, the title *interpreter* should be used in all contexts and all documentation relating to the provision of contracted interpreting services.

*Recommendation 1: In recognition of the specialist nature of interpreting work, the title of interpreter should be used in all contexts and documentation relating to MoJ contracted interpreting services. For ease of use or reference in this context only, this title refers to those who are professionally qualified, community-level interpreters or, exceptionally, others providing an interpreting service within the limits of this contract.*



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## FRAMEWORKS AND STANDARDS

Language and qualification frameworks serve to provide assurance to takers and users of qualifications of their quality and standard such that decisions may be taken with a guaranteed understanding of the knowledge, skills and competencies certified by the learning or qualification.

A number of relevant frameworks and standards govern the language sector and underpin the quality of construct, delivery and achievement within programmes that are designed to equip future language users with the skills and competencies required to become professional language practitioners. In the specific context of interpreting and this review, they serve to set standards of professionalism and to provide pathways for development and delivery of a future pipeline of suitably skilled, qualified and competent interpreters. Frameworks are included for English in addition to other languages which is important in the context of interpreting where many interpreters may not have English as their first language.

### REGULATED QUALIFICATIONS FRAMEWORK (RQF)

The Regulated Qualifications Framework (RQF) replaced its predecessors, the QCF and NQF, in October 2015 and is the overarching national standard for categorisation of qualifications by level and size across all subject specialisms. It comprises an 8-level framework from GCSE or equivalent level (Level 1) through to Doctorate or equivalent level (Level 8) and sets a nationally recognised scale against which all qualifications and assessments may be measured, aligned or compared.

The level of a qualification indicates the difficulty and complexity of the knowledge and skills required to achieve it. The size of a qualification indicates the estimated total teaching, study and assessment time required to complete it.

The Office of Qualifications and Examinations Regulation (Ofqual) has regulated qualifications, examinations and assessments in England since 2010 and all qualifications on its register are accredited at the relevant RQF Level including vocational, technical and professional qualifications. The register has free-to-use public access and can be consulted for full details of qualification providers and qualification content and requirements. Organisations that wish to provide regulated qualifications must be recognised as an Awarding Organisation by Ofqual and are themselves subject to annual evaluation of their performance against stringent Conditions of Recognition.

The European Qualifications Framework (EQF) is an equivalent European scale with the purpose of making qualifications more readable across different countries, serving as a bridge between different national frameworks and systems. It provides a measure of equivalence for qualifications accredited in other countries and those from the UK.

The RQF states that a qualification at Level 6 is the minimum requirement for entry level professional work. At this level, qualification holders have the relevant and requisite knowledge and skills to

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undertake professional assignments. For purposes of comparison, vocational and professional qualifications at this level are the equivalent of a university bachelor's degree, a degree apprenticeship and the highest level achievable as a National Vocational Qualification (NVQ).

RQF and EQF scales and their alignment can be found in Appendix A.

### COMMON EUROPEAN FRAMEWORK OF REFERENCE FOR LANGUAGES (CEFR)

The Common European Framework of Reference for Languages (CEFR) has its origins in the 1960s and provides a descriptive framework of communicative language competence for the development and specification of language learning objectives. With extensive, underlying, theoretical and empirical research, the CEFR is now the best known and most widely referenced tool for language learning, teaching and assessment. The original scaled descriptors of proficiency (from beginner to near native) have since been extended to allow for contextual specialisations and languages beyond Europe.

The formal framework was launched in 2001 and categorises three major stages of language development: Basic User (A1-A2), Independent User (B1-B2) and Proficient User (C1-C2). A 2018 CEFR Companion Volume for the first time includes reference to '*mediation*' as a language skill, described in the Volume as '*acting as intermediary to speakers of different languages*' and '*making communication possible between persons who are unable to communicate with each other directly*'. The Volume states that these descriptors are not intended for interpreters and translators and specifically recognises that "*the language competence of professional interpreters and translators is usually considerably above CEFR Level C2*". However, mediation and facilitation of cross-language communication are all part of interlingual communication and may be of relevance at lower levels.

CEFR level C1 is aligned to RQF Level 6, the recognised minimum national standard for professional work. CEFR Proficiency Levels can be found in Appendix B.

### NATO STANAG

The NATO Standardized Agreement (STANAG) 6001 is an international military standard describing language proficiency levels. Originally designed for English language with the aim of regulating language use across armed forces in different countries working together, it is now also used to define standards for other languages and is the measure of proficiency used by the UK Ministry of Defence in its language training and assessments.

STANAG language profiles for military linguists create 'jagged' profiles indicating levels of language proficiency in each skills area (listening, speaking, reading, writing) as well as providing summary proficiency bandings 1-5, from Survival (Level 1) to Articulate Native Speaker (Level 5). Level 3 (Professional) is the level required to be operationally competent in work settings. Level 4 (Expert) is required to '*act as arbiter*' in the role of language intermediary, roughly equivalent to CEFR C1/2.

The STANAG 6001 framework is included here for the purposes of context and comparison.

## Review of Qualifications and Experience Requirements for Spoken Language Interpreting

### ENGLISH LANGUAGE FRAMEWORKS

Several widely recognised assessment systems exist to measure general English language competence: Cambridge Assessment English, the International English Language Testing System (IELTS), English for Speakers of Other Languages (ESOL), and the Test of English as a Foreign Language (TOEFL).

Cambridge Assessment English exams are taken worldwide and have scaled proficiency levels from beginner to near-native level aligned with the CEFR from A1-C2. The Cambridge English: Advanced test (CAE, but name recently changed to C1 Advanced) is equivalent to CEFR level C1. Cambridge Assessment English and the British Council co-own IELTS, the internationally recognised scale for assessing academic English, predominantly at the point of university entry. IELTS has a numerical scale with band descriptors of spoken and written performance at each of its 9 bands. IELTS 6.5 is considered broadly equivalent to CEFR C1.

ESOL qualifications serve a very wide range of purposes from general English to English for Business or Teaching. The qualifications are regulated and graded from Entry Levels through to Levels 1-3 each with CEFR equivalences. ESOL Level 2 is considered an equivalence with CEFR C1.

TOEFL is an American standardized English test designed to measure the English language ability of non-native speakers. The test is primarily taken as proof of English for university entry. It is a numerical scale with scores up to a maximum of 120 made up of four scores, out of 30 for each language skill (listening, speaking, reading, writing). Individual skills have 4-5 band descriptors to indicate a range of proficiency from 'Below Basic' to 'Advanced'. TOEFL 94-114 is considered a broad equivalence with CEFR C1.

English qualification framework scales and equivalences can be found in Appendix C.

### NOTE ON EQUIVALENCES

The independence of each language framework means they are unique in presentation, comprising similar but distinct level definitions and articulating criteria at each level individually. Each is applied in different contexts to different audiences to assess specific ranges of competence. Direct equivalences are therefore never absolute but broad comparisons and correspondences have been drawn between them over time both by government and the profession and provide long-established tables of equivalence commonly referenced by those seeking clarification.

Nationally the RQF provides a valid and reliable measure of language qualifications against general educational levels. For language-specific equivalences, the international reach and recognition of the CEFR makes this the preferred framework for many language contexts and is the framework against which most language learning, teaching and assessments is aligned.

## Review of Qualifications and Experience Requirements for Spoken Language Interpreting

The equivalences given above are derived from CIOL's language frameworks which offer a broad read-across of levels from different framework and qualification providers. These can be found at Appendices C and F.

*Recommendation 2: National and international qualifications frameworks recognise the equivalent of an RQF Level 6 as the standard required for professional activity. This level defines the knowledge and skills required to undertake professional activity and assignments. Language frameworks and related language assessment schemes have been mapped against these frameworks. Equivalences, although not always absolute, can be drawn to demonstrate in each case where professional standards are met. The key, relevant language standard in this respect is the CEFR level C1. These professional levels and standards should be used when defining standards for MoJ language services.*

### INTERPRETING STANDARDS

Professional standards for interpreters working in public services are rooted in the Nuffield Interpreter Project research undertaken in the early 1980s, prompted by a call from the judiciary to investigate the quality of interpreting provided in public service settings, and particularly legal contexts. There followed the creation of professional qualifications, the setup of a national register of interpreters working in public services, and the establishment of National Occupational Standards for interpreting. The award of a Royal Charter to the language profession in 2005 raised national recognition of the specialist professions of interpreting and translation and served to set and strengthen professional standards. These standards are recognised and upheld by other professional and membership bodies.

#### Nuffield Interpreter Project

The Nuffield Interpreter Project (1983-1991) brought together legal and language professionals and established the first UK standards and qualifications for interpreters working in public service settings (law, health and local government). It identified the need for formal qualification for language practitioners working professionally as interpreters in the public sector, supported by relevant training, to protect the public interest. The (then) Institute of Linguists (IOL) was tasked with creating a series of formal qualifications (Certificate in Bilingual Skills/Certificate in Community Interpreting/Diploma in Public Service Interpreting) that would provide a development pathway for interpreters. In 1994 the National Register of Public Service Interpreters (NRPSI) was established, under the auspices of IOL, creating for the first time a source list of professionally qualified and experienced interpreters. Its purpose was to provide assurance to end-users of interpreters of the quality, competence and skills of its registrants.

## Review of Qualifications and Experience Requirements for Spoken Language Interpreting

### National Occupational Standards for Interpreting (NOS)

The National Occupational Standards for Interpreting (NOS), first published in 2001 and last revised in 2017, set out 9 standards describing the knowledge, skills and understanding an interpreter must possess to be fully competent in an interpreting capacity within a professional setting. Two standards describe language and interpreting competence (CFAINT03/04), two pertain to interpreting-related translation (CFAINT06/07), three concern professional practice (CFAINT01/02/08) and two relate to knowledge and development (CFAINT05/09). This makes evident that interpreting competence extends beyond simple language ability to include specialist interpreting skills and techniques, professional conduct and contextual understanding of the sectors in which services are delivered. An overview of the NOS can be found in Appendix D.

### International Organisation for Standards (ISO)

The ISO is an independent non-governmental organisation responsible for developing and publishing international standards.

*BS-ISO 20228-19 Legal Interpreting* is a services standard that relates to the provision of interpreting services in legal settings and is a standard for service providers rather than individual interpreters. However, the standard includes a section outlining the competences required of legal interpreters deployed by service providers and offers a reference structure for the practical assessment of competence. Its interpreter requirements equate to RQF Level 6 knowledge and skills with a specific focus on legal settings.

*BS-ISO-13611-2014 Interpreting – Guidelines for Community Interpreting* sets out criteria and standards for oral communication to assist specifically with access to public services where a person does not speak the language of the services well. This can include education, social services, healthcare, businesses, faith institutions and emergency situations. In much of Europe the term Community Interpreting is also used in legal settings but the standard recognises that different arrangements may pertain in other countries. In the UK Community Interpreting scenarios exclude legal settings, primarily referring to services provided in the community, informally or voluntarily, for everyday interactions. It generally excludes paid professional work and any interactions with the police or courts. The main UK qualification for interpreting at this level is the RQF Level 3 Community Interpreting. The ISO's scope covers criteria for interpreters and the provision of services.

ISO Interpreter requirements for both standards can be found in Appendix E.

### Chartered Institute of Linguists (CIOL)

CIOL is the UK's Royal Charter professional body for language practitioners. It enhances and promotes the value of languages and language skills in the public interest and provides regulated qualifications through its awarding organisation CIOL Qualifications. Its language frameworks set out

## Review of Qualifications and Experience Requirements for Spoken Language Interpreting

prescribed standards for professional work in interpreting as well as standards for those working with languages in other occupational sectors. Its qualifications, regulated by Ofqual, set a minimum professional standard for interpreters at RQF Level 6 through the Diploma in Public Service Interpreting (DPSI) and the Diploma in Police Interpreting (DPI). CIOL holds the Royal Charter on behalf of the profession and interpreters who can demonstrate that they are qualified, experienced, practising and committed to continuing professional development (CPD) hold the title Chartered Linguist (Interpreter). CIOL's professional language framework and how it links to qualifications can be found in Appendix F.

### [Institute of Translation and Interpreting \(ITI\)](#)

ITI is an independent professional membership association for practising translators and interpreters. It works to professional standards and supports its members in their practice and development. It offers Qualified Membership to interpreters meeting the relevant criteria. These include an entry assessment and/or a minimum of 400 hours of experience. These criteria align with the standards of the sector and recognise a minimum professional standard for interpreters and translators at RQF Level 6 or equivalent.

### [National Register of Public Service Interpreters \(NRPSI\)](#)

NRPSI is the independent voluntary regulator of interpreters specialising in public service work. It recognises the National Occupational Standards (NOS) for interpreting as the minimum professional level for full registration and accepts the sector's specialist professional interpreting qualifications at Level 6 or above. Full status interpreters have a minimum of 400 hours of public service experience. An Interim status allows for registration of early career interpreters and those in the process of completing a formal qualification. A rare language status sets out the requirements for registration in languages for which there is no formal qualification and/or an infrequent demand for services.

Other professional and membership associations active in the sector support the above professional standards including the Association of Police and Court Interpreters (APCI), established in 1974 and the Society of Metropolitan Interpreters (SOMI) whose members work for the Metropolitan Police Service.

### [Police-Approved Interpreter or Translator Scheme \(PAIT\)](#)

A new set of standards was approved by the National Police Chiefs' Council (NPCC) in 2020 for the recognition and deployment of interpreters/translators working in the police service. Nationally, the police operate under a similarly complex, regulatory structure to the MoJ. The PAIT scheme provides national guidelines on qualifications and experience requirements for police interpreting and translation assignments. It sets a Level 6 qualification plus 400 hours public service interpreting experience (of which 50 must be in a police setting) as minimum criteria for full registration. Criteria

## Review of Qualifications and Experience Requirements for Spoken Language Interpreting

are also specified for legacy, temporary and rare language PAIT interpreters to deal with the transition from previous arrangements and the particular challenges of standardisation across rare languages. It also provides for an Inspector-approved temporary PAIT status which, in exceptional circumstances, allows interpreters without qualifications or with lesser experience (100 hours of which 30 must be in police settings) to be deployed where no full PAIT can be sourced.

*Recommendation 3: National and international interpreting standards exist to describe the required competences, knowledge and skills to undertake professional legal interpreting work. These are based on principles derived from study, research and practice and provide a theoretical framework for the development of qualifications, the mapping of educational programmes and the management of professional activities. A professional standard, RQF Level 6 or CEFR C1, is the equivalent of a Bachelors degree programme. A community standard exists at RQF Level 3, the equivalent of a UK A-Level and provides for interpreting in community settings. Each standard has one or more established and respected qualifications accrediting interpreters with the knowledge, skills and techniques, including level of language, modes of interpreting and specialist sector expertise, at the relevant standard. MoJ should consider applying these recognised standards, at two levels, to the provision of MoJ interpreting services recognising both a professional and community level.*

### QUALIFICATIONS, EXPERIENCE AND RARE LANGUAGES

#### QUALIFICATIONS

The current minimum requirements set out for MOJ face-to-face interpreting are defined according to core or rare language, the primary language of the interpreter (English or non-English) and the complexity level for which the interpreter is registering. Rare languages are those in which there is no DPSI qualification available (see also section on Rare Languages).

The requirements include specific, named professional qualifications (e.g. DPSI), generic UK educational qualifications (e.g. BA/MA in ...), and broader descriptors to allow for equivalences from other countries (e.g. Degree in ...). Any certificates presented from other countries or in other languages must be either translated or carry proof of equivalence.

There are three core competences which are included and described in all interpreting standards and tested in all professional interpreting qualifications. They form the core of criteria for membership of professional bodies, are included in criteria for chartership and are required for registration with the voluntary regulator. These are:

- high level (C1 or above) proficiency in two or more languages;
- technical interpreting skills and techniques;
- specialist sector knowledge of relevant contexts and terminology.

These competences should be proven at the minimum qualification level of RQF Level 6 (or equivalent) and are the competences which should be assessed and applied to evaluation of an interpreter's readiness to perform effectively and safely in professional practice. The same level, equivalent to university degree level, is widely recognised as the minimum requirement for professional practice in other areas such as accountancy, HR, marketing and law.

A full list of qualifications requirements under the current contract can be found in Appendix G.

#### RELEVANCE AND SUITABILITY OF CURRENT QUALIFICATIONS REQUIREMENTS

This section reviews individual or groups of qualifications listed on the current qualifications requirements. In particular, a view is provided as to their capacity to evidence the recognised professional standard and the core competences outlined above (language levels, interpreting techniques and specialist knowledge).

The suitability of a qualification to provide evidence may depend on whether the holder is an English or non-English speaker. For example, a 'Degree in English' is not good evidence of competence in two languages if held by an English first language speaker. If held however by someone whose first language is not English, e.g. as the equivalent of modern foreign languages degree, then second language competence can be proven.



## Review of Qualifications and Experience Requirements for Spoken Language Interpreting

### Professional Qualifications

*Diploma in Public Service Interpreting (DPSI) (Law pathway) [CCI (IOL) – discontinued in 1994, forerunner to DPSI]*

*Diploma in Police Interpreting (DPI) (formerly Metropolitan Police Test)*

*Diploma in Community Interpreting (DCI) (Police and Courts option)*

These qualifications are the core professional qualifications available for public service interpreting. First introduced in the 1990s, the DPSI has been the standard setter for public service interpreting for over 30 years. The DPSI (Law) remains the qualification certifying the highest number of public service interpreters for police and legal settings.

The DPSI is a regulated RQF Level 6 qualification with three pathways specialising in law, health or local government. It is currently available in 46 languages though the offer can fluctuate depending on demand. Its 5 units are individually accredited at RQF level 6 and cover consecutive and simultaneous interpreting, sight translation and written translation. Unit 1 is the key oral unit, assessing both consecutive and simultaneous interpreting in practical role-play scenarios. This unit and the sight translation units (Units 2 and 3) test the key ability of an interpreter to perform effectively in court and other legal settings. A full DPSI requires a pass in all units. The DPSI is offered by CIOL Qualifications through formal examinations and TQUK<sup>1</sup> through a combination of formal examination and controlled assessment.

The DPI is a regulated RQF Level 6 qualification and in 2013 replaced the Metropolitan Police Test (originally established in 1977 for the purpose of setting interpreter standards for police work). Its 5 units are individually accredited at RQF Level 6 and cover consecutive and simultaneous interpreting, sight translation and written translation. Unit 1 assesses the core interpreting modes of consecutive and simultaneous interpreting in a practical statement-taking scenario. The qualification is offered twice a year by CIOL Qualifications and is assessed by formal examinations. There is substantial overlap between the specialist police content and the content of the DPSI Law pathway.

The DCI is a regulated RQF Level 6 qualification introduced in 2016. It combines an integrated learning programme and assessment. The qualification comprises 6 mandatory units testing language level in English and another language and technical interpreting skills and techniques with optional knowledge and skills units covering a range of public sector contexts and specialist skills. There are relevant optional units on police and court work that prepare learners for work on MoJ assignments and provide the required knowledge of legal contexts and terminology. Assessment is based on presentation of a portfolio of evidence produced at prescribed points during the learning programme. The DCI is offered by TQUK<sup>1</sup>.

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<sup>1</sup> Since this report was completed in June 2022, TQUK's portfolio of interpreting qualifications has been transferred to iCQ (icanqualify).

## Review of Qualifications and Experience Requirements for Spoken Language Interpreting

The DPSI (Law), the DPI and the DCI (with relevant legal options) are all regulated qualifications, assess all three core competences and are structured specifically to address the requirements of interpreting within the justice system and professional practice. The qualifications provide evidence of competence for first language English and non-English speakers.

As DPSI and DPI units are individually accredited, partially qualified interpreters only have professional level skills in the units and skills in which they have been assessed. They have not been tested in the full range of interpreting modes and techniques and have been assessed only in a reduced range of legal scenarios. Units 1, 2 and 3 assess the core oral skills required for spoken interpreting and do not test writing/translation skills.

Interpreters holding a DPSI in other pathways (Health, Local Government) or a DCI without the police/court modules are assessed in only two of the three competences – language level and interpreting skills and techniques. They therefore require further training and assessment in legal contexts and terminology.

Approximately 48% of all interpreters registered with the MoJ are holders of one of these qualifications. A further 10% are partially qualified.

NOTE: TQUK<sup>2</sup> have withdrawn their suite of interpreting qualifications, including DPSI and DCI, from new registrations from 1 June 2022.

Qualification	RQF Level	Native/near native skills in English and another language	Technical interpreting skills and techniques	Legal contexts and terminology
DPSI Law	6	Yes	Yes	Yes
DPI	6	Yes	Yes	Yes
DCI with Law Option (withdrawn)	6	Yes	Yes	Yes
DPSI Health or Local Government/ DCI without legal modules	6	Yes	Yes	No

### University Interpreting and Translation Degrees

*BA/MA Interpreting or Interpreting & Translation*

*MA Conference Interpreting*

*BA/MA Translation*

These are regulated qualifications RQF Level 6 (Bachelors) and RQF Level 7 (Masters) which all meet the RQF Level 6 minimum qualification standard.

Specialist degrees in interpreting (sometimes combined with translation) at undergraduate and postgraduate level have the specific purpose of preparing students for work as an interpreter at entry level. They develop and improve language skills and teach specialist interpreting skills and techniques.

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<sup>2</sup> Since this report was completed in June 2022, TQUK's portfolio of interpreting qualifications has been transferred to iCQ (icanqualify).

## Review of Qualifications and Experience Requirements for Spoken Language Interpreting

Legal content is included only if module specialisms permit. Learners are taught all the core interpreting skills and techniques: consecutive and simultaneous interpreting, sight and written translation. Conference interpreting qualifications develop language skills and interpreting skills and techniques with a strong focus on simultaneous interpreting, one of the more challenging skills for interpreters. Specialist interpreting degrees therefore provide evidence of only two of the three competences – language level and interpreting skills and techniques. Interpreters therefore require further training and assessment in legal contexts and terminology or would need to demonstrate knowledge of legal contexts and terminology through evidenced experience, training or professional development. Providing the degree includes English, these qualifications can provide evidence for first language English and non-English speakers.

Translation requires a different skillset to interpreting, and translation programmes do not teach interpreting skills although they will develop and improve language skills and may contain specialist content. Whilst a qualified interpreter is trained in undertaking short, relevant translation tasks, a qualified translator is unable to interpret unless specifically and additionally trained to do so. Degrees in translation are therefore unsuitable as a general criterion for interpreter requirements unless a qualified translator can demonstrate suitable and relevant interpreting knowledge and experience.

Specialist BA/MA programmes in Interpreting, or Interpreting and Translation, or Conference Interpreting, all meet two of the three core competences (two languages and interpreting skills) but graduates will not have the required knowledge of legal contexts and terminology unless specified as part of the programme. Interpreters presenting with a specialist interpreting degree would need to demonstrate knowledge of legal contexts and terminology through evidenced experience, training or professional development.

Qualification	RQF Level	Native/near native skills in English and another language	Interpreting technical skills and techniques	Legal contexts and terminology
BA/MA Interpreting	6/7	Yes	Yes	No, only if specified
BA/MA Interpreting & Translation	6/7	Yes	Yes	No, only if specified
MA Conference Interpreting	7	Yes	Yes	No, only if specified
BA Translation	6	Yes	No	No, only if specified

### UK Modern Language Degrees

*BA/MA Modern Languages (and Joint Honours)*

*Non-UK degrees in English (Modern Language equivalent) for first language non-English speakers*

UK degrees are regulated at RQF Level 6 (Bachelors) and RQF Level 7 (Masters) which meet the RQF Level 6 minimum qualification standard. Non-UK degrees in English, where English is taken as a foreign language, require proven equivalence with RQF Level 6. This can be done through UK ENIC (previously NARIC) or by certified translation.

## Review of Qualifications and Experience Requirements for Spoken Language Interpreting

Undergraduate modern language degrees combine language acquisition and improvement in one or more languages with the study of literary, cultural, political and economic aspects of the country or regions where the language is spoken. The balance between language acquisition and content learning depends on individual programme construct. Modern language degrees do not normally include in-depth interpreting training.

A language student may choose to combine study of a language with another discipline, gaining equal credits for each subject as a Joint Honours degree. Combinations can include the study of two languages or a language with a different discipline e.g. politics, history, economics or law.

A single or joint honours modern languages graduate meets only one of the core criteria (language level). Where the 'joint' discipline is law, graduates' legal knowledge is only assessed in English, not in the foreign language. They do not possess specialist skills and techniques in interpreting.

For first language non-English speakers who hold a non-UK modern languages degree in English, the qualification holds the equivalent relevance and suitability as an English speaker with a modern languages degree providing the minimum qualification standard of RQF Level 6 is proven.

Qualification	Level	Native/near native skills in English and another language	Interpreting technical skills and techniques	Legal contexts and terminology
BA/MA Modern Languages	6/7	Yes	No	No
BA Joint Honours (modern language + another discipline)	6	Yes	No	No
Non-UK degree in English	6	Yes	No	No

### Other University Language-Related Degrees

*MA in Teaching English*

*Language Related degree (FL)*

*Language Related diploma (FL)*

*Language Related degree where English features as part of the course*

None of the above qualifications are evidence of interpreter competence.

An MA in Teaching English is a regulated, RQF Level 7 teaching qualification. It does not offer any evidence of competence in a foreign language (unless presented by a first language non-English speaker), nor interpreting skills nor techniques or knowledge of legal contexts and terminology.

'Language related degree', 'Language related diploma' and 'Language Related degree where English features as part of the course' are unspecific descriptors. They may include UK degrees such as European or International Studies which typically include language study or overseas degrees/diplomas that include some study of English. Only the analysis of the programme structure and module offer can reveal the extent to which language study is included and assessed. These

## Review of Qualifications and Experience Requirements for Spoken Language Interpreting

qualifications do not guarantee language competence, nor interpreting skills and techniques nor knowledge of legal contexts and terminology.

Most UK University Modern Language Centres now offer credit-bearing modules to students of all disciplines within a ‘Languages for All’ or ‘University-Wide Language Programme’ structure. These modules are popular and may include modules in English for foreign students. They are not full qualifications and therefore do not meet the minimum qualification standard of RQF Level 6 in their own right. They typically serve as elective units within other degrees and are taken in the first and/or second year of study and may be mentioned on certificates (e.g. History with French or History and French). The language level achieved from such modules typically ranges from level CEFR A1-B2 (for foreign languages), sometimes higher for English (for foreign students). They do not include interpreting skills and techniques nor appropriate learning of legal contexts and terminology.

Qualification	Level	Native/near native skills in English and another language	Interpreting technical skills and techniques	Legal contexts and terminology
MA in Teaching English	7	No	No	No
Language related degree	6	No, unless level is certified	No	No
Language related degree where English is part of the course	6	No, unless level is certified	No	No
Language Centre modules	n/a	No, unless level is certified	No	No

### Other University Programmes

*BA English*

*BA/MA Linguistics*

*Degree in Linguistics*

*BA Philology*

*Degree in English language*

*Degree in English philology*

None of the above qualifications are evidence of interpreter competence.

Although BA/MA degrees are recognised at RQF Level 6 and 7 respectively, UK degrees in English, Linguistics and Philology do not include the study of foreign languages and are not suitable as evidence of competence in a second language. Degrees in English Language and English Philology from institutions in other countries require checking both for equivalence with RQF Level 6 and relevant language content but may provide evidence of competence in English for first language non-English speakers. UK or overseas degrees in linguistics do not offer evidence of competence in a second language.

None of these qualifications include the study of interpreting skills and techniques nor of legal contexts and terminology.

## Review of Qualifications and Experience Requirements for Spoken Language Interpreting

Qualification	Level	Native/near native skills in English and another language	Interpreting technical skills and techniques	Legal contexts and terminology
BA English & BA in Philology	6	No	No	No
BA/MA Linguistics	6	No	No	No
Degree in Linguistics	6	No	No	No
Degree in English Language/Philology	6	Only if non-native English speaker	No	No

### Vocational Qualifications

*Level 2 Community Interpreting*

*Level 3 Community Interpreting*

*Level 4 Community Interpreting*

These are regulated qualifications at the RQF levels given and are a sequence of qualifications providing a development and progression pathway for interpreters within the scope of community interpreting settings (education, welfare and benefits, housing, health etc). They are intended to prepare and develop skills to enable holders of the qualifications to support non-English speakers in accessing public services within their communities.

The Level 2 Award is a preparation course providing language development, an introduction to basic interpreting knowledge, skills and techniques and familiarisation with various public service settings. The Award is delivered by several awarding organisations. The Ascentis level 2 qualification specification states explicitly that *“this is not a training course to become an interpreter”* and that *“those undertaking paid assignments in future will be expected to have achieved as a minimum the Level 3 Certificate in Community Interpreting”*.

The Level 3 Certificate in Community Interpreting stands as the commonly accepted minimum standard for community-based interpreting. It is offered by several awarding organisations and typically includes modules on preparing for assignments, two-way interpreting in practice and glossary building for the domains in which interpreters may undertake work. This does not generally include legal settings. Level 3 qualified community interpreters are typically, but not exclusively, speakers of a first language other than English. Evidence of language skills in both languages at a minimum of CEFR B2-C1 is a pre-requisite for most Level 3 community interpreting qualifications.

The Level 4 Certificate in Community Interpreting develops and extends skills for interpreters who already have a minimum of 50 hours interpreting practice. It includes an option for introduction to legal interpreting and acts as a waystage towards qualification at a professional level, e.g. the DPSI, DPI, DCI, and offers specialisms such as law, health or local government. TQUK were the sole provider of the qualification in England but have withdrawn it from new learners from 1 June 2022<sup>3</sup>.

While Level 2-4 community interpreting qualifications do not meet the standard required for professional practice in respect of knowledge and skills, interpreters qualified at Levels 3 and 4 have language and interpreting skills and techniques that enable them to facilitate communication in simple, straight forward, predictable scenarios under facilitative or collaborative conditions.

<sup>3</sup> This qualification has been transferred to iCQ since this report was completed.

## Review of Qualifications and Experience Requirements for Spoken Language Interpreting

Community interpreting training and qualifications do not typically include simultaneous interpreting and do not assess writing and translation competences.

The qualifications at Levels 3 and 4 are evidence of interpreter competence at a community level in terms of language competence and are limited to a single, consecutive, interpreting mode. Holders of the qualifications have not been assessed in writing or translation and do not have specialist knowledge of legal contexts and terminology.

Qualification	Level	Native/near native skills in English and another language	Interpreting technical skills and techniques	Legal contexts and terminology
Level 2 Award in Preparation for Work in Community Interpreting	2	No	No	No
Level 3 Certificate in Community Interpreting	3	Level 6 is pre-requisite but only oral skills tested.	No simultaneous interpreting or sight translation into Eng	No
Level 4 Certificate in Community Interpreting (withdrawn)	4	Level 6 is pre-requisite but only oral skills tested.	No simultaneous interpreting or sight translation into Eng	No Limited introduction to CJS as option

### Government accreditations

These are tests and accreditations that are, or have been, in use in government departments and public service organisations that require interpreting services. The qualifications, experience and assessments required vary by department, each with provisions for the assessment of skills in languages where there are no qualifications. They are not therefore, on their own, proof of the recognised professional standard but do provide a good indicator of language level and interpreting skills. Interpreters accredited by these departments work in fields that are related to justice but may not have knowledge or experience of broader legal contexts and terminology.

The Immigration and Nationality Department (IND) preceded the UK Border Agency, established in 2008, itself succeeded in 2013 by UK Visas and Immigration (UKVI). IND interpreter tests did not include any assessment of simultaneous interpreting, nor of written skills. Current UKVI interpreter registration criteria require one or more of the following: Full status registration with NRPSI; DPSI Law or Partial DPSI with passes in all oral components; DPI; or existing registration with either the AIT or the Metropolitan Police. The Immigration Appellate Authority (IAA) and its successor the Asylum and Immigration Tribunal (AIT) did not originally test simultaneous interpreting although assessment of this mode of interpreting was introduced from 2000. AIT assessments did not include an assessment of written skills.

There is evidence that these accreditations were based on previous National Agreement<sup>4</sup> standards but were not independently certified. Interpreters with one or more of these accreditations may

<sup>4</sup> The 'National Agreement on arrangements for the use of interpreters (.....) within the Criminal Justice System' was introduced in 1997 and governed interpreter use until language services were outsourced in 2012.

## Review of Qualifications and Experience Requirements for Spoken Language Interpreting

meet professional interpreting standards and the three core competences, either through qualification or experience, but this would require evidence of certification or a formal assessment.

Accreditation	Level	Native/near native skills in English and another language	Interpreting technical skills and techniques	Legal contexts and terminology
AIT (formerly IAA)	n/a	Yes	No simultaneous prior to 2000), no written	Yes, in related field
IND Home Office	n/a	Yes	No simultaneous or written	Yes, in related field
UK Border Agency Certificate	n/a	Yes	Yes, if evidenced	Yes, in related field
UKVI	n/a	Yes	Yes, if evidenced	Yes, in related field

### Professional, membership and regulatory organisations

Membership or registration with such bodies is subject to the admission criteria of the individual organisation, usually a combination of qualifications and experience. Professionally, they recognise RQF Level 6 as the minimum standard for membership or registration.

Full membership of the Chartered Institute of Linguists (CIOL) with interpreter status, MCIL (Interpreter) or Chartered Linguist (Interpreter), requires evidence of RQF Level 6 qualification in language and interpreting skills and 3-5 years' interpreting experience supported by professional references. No sector specialism is required but may be included as part of a member's profile.

Membership of the Institute of Translation and Interpreting (ITI) with Qualified Interpreter status, Qualified (ITI), requires a variable combination of qualification, experience and references that meet minimum points criteria plus an online interview. No sector specialism is required but may be included as part of a member's profile.

Registration for Full Status with the National Register of Public Service Interpreters (NRPSI) requires evidence of a qualification at level 6 that complies with the National Occupational Standards for Interpreting and a minimum of 400 hours experience in public service interpreting. No sector specialism is required but may be included as part of a member's profile.

The Association of Police and Court Interpreters (APCI) has membership criteria that match the qualifications and experience requirements of NRPSI. Criminal justice experience is essential.

Membership or registration with such organisations is a good indicator of an interpreter's ability to meet the competences required for registration with MoJ but is not sufficient on its own, without checks against specific qualifications and experience requirements, to be certain that the standards and specialisms required of MoJ interpreters are met.

Accreditation	Level	Native/near native skills in English and another language	Interpreting technical skills and techniques	Legal contexts and terminology
CIOL Membership (Interpreter)	6	Yes	Yes	Yes, with evidence



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CIOI Chartered Linguist (CL Interpreter)	6	Yes	Yes	Yes, with evidence
ITI Membership (Qualified Interpreter)	6	Yes	Yes	Yes, with evidence
APCI Membership	6	Yes	Yes	Yes
NRPSI Full Status	6	Yes	Yes	Yes, with evidence

### English Language Qualifications

The main English language qualifications are those relating directly to four core frameworks (see Frameworks and Standards above), Cambridge English, ESOL, IELTS and TOEFL. Each has its own reference scales with read across to other frameworks and standards (see Appendix C). Cambridge and ESOL qualifications are regulated by Ofqual. The purpose of all the qualifications is to assess the level of general English language only and they provide a well-established, valid and reliable source of English language competence for non-native English speakers. They do not evidence language ability in two languages, do not test interpreting skills and have no specialist legal contexts or terminology content.

Accreditation	Level	Native/near native skills in English and another language	Interpreting technical skills and techniques	Legal contexts and terminology
Cambridge English	Equiv to 6	If Advanced or Proficiency level	No	No
ESOL	Equiv to 6	If Level 2 or above	No	No
IELTS	Equiv to 6	If 6.5 or above	No	No
TOEFL	Equiv to 6	If 94 or above	No	No

## INTERPRETER REGISTRATIONS

### Current requirements and complexity levels

Interpreters currently register with MoJ at one of three complexity levels: Standard, Complex or Complex-Written. The requirements for each level can be found in Appendix G. Of all interpreters currently listed, just over half (54%) are registered at Complex Written level, and around a quarter (24%) at Complex and Standard (22%) level respectively. At Complex Written and Standard levels registrations in core languages make up a large majority (92-94%) while the percentage is slightly lower (80%) at Complex level.

The primary requirement for Complex Written level interpreters in core languages is one of the three professional qualifications – DPSI (or CCI), DCI, DPI – the minimum level recognised as a professional standard that meets all the core competence requirements. For rare languages at this level, where no professional qualification exists, a separate list of qualifications applies. Whilst these are almost exclusively degree level (RQF Level 6 equivalent) and include relevant interpreting qualifications they

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also include diplomas (of unspecified level), partial completion of professional qualifications and some qualifications which do not fully meet the core competences (e.g. BA Modern Languages). Some, which is a particular concern, do not match any of the core competences (e.g. Degree in Linguistics).

Requirements at Complex level differ according to the primary (or first) language of the interpreter, primary English or non-English speaker, not by core or rare language. They include some English-medium UK degrees for non-English first language speakers where they serve to provide evidence of second language competence in English, including degrees in language-related disciplines such as Philology or Linguistics. This serves only as potential evidence of language skills, just one of the three core competences. The suitability of individual qualifications as evidence of the three core competences is variable.

At Standard level different requirements apply for core and rare languages. The listed qualifications for core languages range from a 'Basic Interpreting Qualification' (RQF Level 1 or lower, equivalent to GCSE Grades D-G or 3-1), through mid-level community interpreting qualifications (RQF Levels 2-4) to unit/partial passes in professional qualifications or one of the other government accreditations. For rare languages, a similar range applies although the minimum requirement is described generally and worryingly as simply 'experience of providing interpretation services in the relevant language'.

The current requirements are driven less by adherence to published standards and more by the need to specify qualifications and experience requirements that can be applied across a large and very diverse range of languages, each of which has its own complexities. This means that in practice, different standards are being applied to different languages at each of the complexity levels.

An alternative approach would recognise and set the standard(s) required in relation to qualification and where a qualification does not fulfil all the core competences, to consider other sources of evidence to supplement and 'fill the gap'. This evidence might take the form of practical experience, professional development or other training activities. Where requirements are not fully met, an interpreter might be authorised to work on a limited range of assignments until sufficient experience has been gained. Thus a newly qualified interpreter with, for example, a BA in Interpreting who meets two of the three competences (having no legal experience) may be required to undertake a course of familiarisation with legal contexts before being deployed or may be authorised only to undertake assignments of a particular type, or at a specified level, prior to full engagement.

Current requirements include qualifications below RQF Level 3, the community interpreting standard. These do not equip holders with any level of competence that can assure effective deployment on MoJ assignments and the use of interpreters qualified only to this level presents a substantial risk both to the quality of the service provided and to the fulfilment of due process. An even greater risk exists where, for example, a rare language interpreter can be registered without a qualification requirement at all and only needs to show that they have some unspecified 'experience' and no minimum number

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of hours applies. Unless evidence of adequate experience at the required level with successful outcomes can be provided, this type of registration is incompatible with the interpreting requirements of any MoJ assignments.

### Interpreter distribution by qualification

The following analysis is based on a registration dataset dated May 2022. 2,133 interpreters were registered at the time. Registrations are subject to natural flux over time.

96% of all Complex Written interpreters have one of the four listed professional qualifications (includes CCI as predecessor to DPSI). 2% are registered on the basis of NRPSI full membership and the remainder are rare language interpreters with 100 hours of experience and either English proficiency or other English language qualification.

At Complex level, interpreters are registered against 16 different qualification types. Of these, just under half (45%) have partial professional interpreting qualifications or a full university degree in interpreting, the majority with a partial DPSI Law. The number of partially professionally qualified interpreters is a concern. It is unclear whether these interpreters are actively in the course of completing a full qualification (which can take up to 5 years) or whether they are choosing only to complete the minimum units required to register with no intention of progressing to full qualification. Further research to determine this would be helpful in formulating a strategy for the development of future pipeline. Of the remaining Complex level interpreters, a small number (2%) have a modern languages degree, a significant number (16%) are registered on the basis of a degree-level qualification in English, some (4%) are rare language interpreters offering an unspecified qualification, others (19%) are rare language interpreters with experience only (minimum 50 hours) and the remainder (14%) have a language-related or translation qualification.

At Standard level, the interpreter profile is more diverse. About a third (30%) of interpreters have a partial professional qualification, an interpreting qualification at RQF Level 3 or above or are registered based on a government department accreditation. Of most concern here is that nearly half (49%) of all Standard level interpreters are registered under the requirement 'Enrolled on or partially completed qualification' with no specification as to the qualification or its level. This particular requirement was revised to remove the wording 'enrolment on a qualification' in recognition that a simple registration to take a course is insufficient for MoJ registration. Further analysis of the balance between the numbers who are 'enrolled on' and those who have 'partially completed' courses, and the level of qualifications involved, would establish the level of risk presented by this particular group of interpreters. It is also a concern that a number (9%) of interpreters are registered under the rare language criteria where no minimum number of hours of experience are required. The remainder (12%) are registered based on a range of other criteria albeit with a very low number relying on degree

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programmes such as Degree in English or Philology and the majority having an interpreting qualification at RQF Level 2 or below.

*Recommendation 4: Interpreters who do not meet the minimum community standard equivalent to RQF Level 3 or are unable to present suitable equivalent evidence and/or experience, should not be included in the MoJ interpreters' listing. They should be encouraged to undertake training or development to qualify at community level. This guarantees a base-line competence and reassurances on fairness and justice to all stakeholders within MoJ language services delivery.*

This distribution of interpreters by qualification indicates that at Complex Written level, with an extremely high percentage of those registered holding a full professional qualification, MoJ has access to a substantial interpreting resource which is fully competent to complete assignments. This offers strong assurance to MoJ on the quality of provision at this level. Work to increase access to professional qualification for rare languages would further strengthen the resource. Complex Written interpreters do not work exclusively at this level and are also available to accept assignments at Complex level where a greater number of bookings are offered.

At Complex level, there are two key concerns. Firstly, the number of interpreters with a partial professional qualification (DPSI/DPI) and the reasons for this. In some cases an interpreter may be a heritage speaker of a language and unfamiliar with a different script. They may have good oral skills but lack the required reading and writing skills to be able to complete the translation units. Without reading skills they are also unable to perform sight translation into English of a text in that script. However, these interpreters possess valuable oral skills, often in rare languages, which may not otherwise be widely available to MoJ. While partial qualification is not to be encouraged, in such cases the setting of a partial requirement, to include as a minimum the core oral unit(s) assessing consecutive and simultaneous interpreting modes and sight translation from English (the reported language direction in which most sight translation is required), would ensure that these skills are not excluded from service with MoJ. In other cases, it is possible that interpreters are consciously choosing only to complete the minimum requirement in order to register and work, without the intention, effort and expense of completing. Introducing a condition on such registrations, such as an annual review or time limit, may encourage completion.

*Recommendation 5: An analysis of interpreter registrations where qualifications are only partially completed should be undertaken to reveal the causes. Where this is due to a different script and lack of reading/writing skills, consideration should be given to where and how the interpreter is best deployed. In cases of intentional non-completion for the purpose of reaching minimum registration requirements, processes should be identified and implemented to encourage interpreters to become fully qualified. This might include time-limiting registration until full completion is achieved.*

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Secondly, and a concern for rare languages at both Complex and Standard levels there are considerable numbers of interpreters registered based on experience only. However, no minimum experience is specified in the requirements which theoretically allows registrations based only on language ability and no experience of interpreting. Placing an interpreter with no experience into a justice setting creates immense risk for MoJ and an unacceptable level of challenge to someone unfamiliar with the profession. Experience should be an absolute requirement for all registrations. In cases where a rare language might prevent finding an experienced interpreter, for example a language with extremely low speaker numbers in the UK, other measures are needed to mitigate the risk to MoJ and to due process, to protect the interpreter, and to assure adequate quality control. This might include exceptional booking procedures, pre-deployment assessment, additional guidance, in-court observations, structured feedback or other means of assessing how well the assignment was completed.

*Recommendation 6: An experience requirement should apply to all registrations across all languages and all levels. In exceptional circumstances, where qualification and/or experience requirements cannot be met, but use of an interpreting resource is unavoidable, additional measures should be applied during preparation for the assignment, to assess performance and manage any potential risk to MoJ.*

### Qualifications and future pipeline

For the purposes of safeguarding the supply of suitably qualified interpreters and future-proofing language services in the medium and long term, the security and sustainability of the recognised professional qualifications is critical.

From 1 June 2022, TQUK<sup>5</sup> ceased offering all its Ofqual-regulated interpreting qualifications to new learners. This includes their Award in Understanding Community Interpreting Level 1, Certificate in Community Interpreting Levels 2-4 and their two Level 6 professional qualifications, the Diploma in Community Interpreting and Diploma in Public Service Interpreting. With a Certification end date of 1 June 2023, existing learners have 12 months to complete their qualification. This reduces the options available to those seeking to qualify as a professional interpreter considerably and seriously compromises the future supply of professional level qualified public service interpreters. It has a particular impact on rare languages as TQUK has centres which specialise in their training and assessment. It leaves a single DPSI provider in the market, CIOL Qualifications, and removes from the market completely the Diploma in Community Interpreting, which provides a combined training and qualification programme. The latter is particularly attractive to some learners and provides a continuation programme of development for Level 3 interpreters wishing to upgrade to professional level. TQUK are also the second largest supplier of the Level 3 Certificate in Community Interpreting

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<sup>5</sup> Since this report was completed in June 2022, TQUK's portfolio of interpreting qualifications has been transferred to iCQ (icanqualify).

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after Ascentis and account for approximately a third of annual certificates awarded, further threatening future supply of professional interpreters in training. Unless TQUK has plans to transfer these qualifications to a new Awarding Organisation there is potential risk to the supply of professional qualifications on which MoJ services rely and to the qualification pathway for new interpreting career entrants.

The following table shows the number of learners attaining Ofqual-accredited vocational and professional interpreting qualifications at all RQF levels. Following a decline in the number of level 6 certificates awarded in 2020, which may have resulted from the uncertainties and impacts of the Coronavirus pandemic, there was a significant increase in 2021 with a steady rise in the number of certificates issued by TQUK and a step up in numbers qualifying through CIOL. Level 6 certificates cover all public service pathways but interpreters with a legal specialism are in the majority for all qualifications at this level. The number of certificates issued at Level 3 has fluctuated over time but is steady. Significant numbers are now achieving qualification at levels 1 and 2 with numbers at Level 2 rising particularly quickly in the last 3 years. Overall, these awards represent a significant cohort in terms of numbers who choose public service interpreting as a career compared with those emerging from education pathways. In particular, the volumes qualifying at lower levels provide scope and opportunity to establish a targeted learning and development programme specifically for this group to motivate and encourage them to progress to professional level. The same programme might include routes to completion for those who are already partially qualified.

Total Ofqual Accredited Certificates Issued (full passes)											
	Level	2021	2020	2019	2018	2017	2016	2015	2014	2013	2012
Understanding Community Interpreting	Level 1	245	245	325	405	235	150	230	110	30	0
Preparation for Community Interpreting	Level 2	615	570	545	115	105	75	60	20	0	0
Community Interpreting	Level 3	345	290	325	245	315	345	285	190	365	110
Community Interpreting	Level 4	0	0	0	5	15	15	0	15	0	0
Public Service Interpreting / Community Interpreting	Level 6	310	120	195	130	75	55	135	55	260	135

Number of full qualification certificates awarded 2012-2021 (source: Ofqual Analytics, May 2022)

Future-proofing language services is critical and one aspect of professional interpreting work not yet assessed by existing qualifications is remote or video interpreting. The Coronavirus pandemic acted as a catalyst in this regard with remote working a priority to comply with pandemic safety regulations. Within MoJ, courts switched to remote hearings where possible for justice work to continue and to avoid as far as possible cancellations and delays. Interpreters operating in a remote environment need new and additional skills requiring familiarity with different platforms, an understanding of hardware complexities, the ability to deal with issues of connectivity and sound quality. While many educational interpreting programmes now have this as part of mandatory learning, it is not yet a formal part of professional qualifications or interpreting requirements. Consideration should be given to the provision of CPD or additional training in respect of systems used by MoJ and longer term, to the assessment of these skills as one of the core competences required of a professional level interpreter.

*Recommendation 7: The move to use of remote interpreting services, exemplified by the response to Coronavirus restrictions, requires an additional interpreter skillset in respect of technical skills and*

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*practice. Interpreters should receive training or CPD on the specifics of the MoJ Cloud-Video-Platform (CVP) and longer term be assessed on remote interpreting as part of the skillset requirements.*

### EXPERIENCE REQUIREMENTS

Interpreter experience requirements are currently listed separately to qualification requirements and vary dependent on whether an interpreter is registering for a core or rare language. Experience is particularly important when registering interpreters in languages in which there is no qualification or interpreters who are highly experienced but who do not hold a formal qualification.

Experience is vital in addition to qualification for any professional practice. It serves to demonstrate the application of knowledge and skills acquired through study and is an essential part of training for most professions, in legal settings being embedded within pupillage structures.

Membership of professional bodies and chartered professions typically requires experience combined with qualifications for registration. Architects (RIBA), accountants (CIMA/ACCA), marketers (CIM) and linguists (CIOL/ITI) all require a minimum of 2-3 years' experience. NRPSI requires a minimum 400 hours of experience for Full Status registration and 100 hours for Rare Language Status.

Interpreters, mostly freelancers, often work across multiple sectors and gain a range of experience in many different contexts. Public service interpreters may have experience in other settings such as health or local government or may specialise in police or legal work. One of a professional interpreter's competences is the ability to research and prepare adequately whatever the assignment and being able to add new subject areas and specialist topics is an essential part of interpreters' work.

For interpreters working as freelancers in a largely independent sector, finding opportunities to gain experience at entry levels can be challenging. Unlike in 'employed' environments, there are few openings for internships and placements. Feedback from the profession supported evaluation in the longer term of how this might be addressed to benefit pipeline development. This included exploring the potential for apprenticeship-style schemes that might bring together training organisations, language services providers (in the place of employer), awarding organisations and the MoJ to create pathways and accreditation for interpreter development.

It can also be difficult for interpreters to gather verified evidence of completed work. Commercial agencies, delivering contracted-out services, can be reluctant to provide extensive information and details about work undertaken by individual interpreters (and languages) due to concerns about commercial confidentiality. Information provided may be limited to very generic descriptors such as the number of hours undertaken rather than including any indication of the level or specialism of the work.

There is currently no clear route to a career in interpreting directly from school and only a small number of school leavers go on to study interpreting as a degree subject. Many more choose to take

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up interpreting work later in life or careers, often having gained other work experience. Often this will start with informal or voluntary work followed by training and professional qualification. As there is no protection of title for interpreters there are few controls governing who can deliver interpreting services. This makes formal qualification and recognition of verified experience even more important and valuable as an asset that can prove competence and professionalism in a challenging marketplace.

### Current requirements

Current experience requirements for interpreters vary according to the primary language of the interpreter, whether they are offering a core or rare language and the level at which they are registering.

For core languages: at Standard level 100 hours experience is required where no relevant qualification is offered (if qualified, there is no experience requirement); at Complex level 100 hours experience is always required; at Complex Written no experience is required (although a professional interpreting qualification is essential).

For rare languages: Standard level interpreters need only demonstrate 'experience of providing interpretation services' with no minimum hours specified; at Complex level experience is required for interpreters whose primary language is not English, but not for primary English speakers; at Complex Written level 100 hours experience is required.

The experience requirements of professional bodies, the voluntary regulator and other public service users of interpreters indicate that an interpreter at any level of deployment should have acquired experience before being engaged and feedback from MoJ staff shows that those requesting the services of an interpreter are in full expectation of the attending interpreter having the relevant experience as well as appropriate level qualifications.

The current experience requirements hold identifiable levels of risk not least because, as for qualifications, requirements are driven by the challenge of servicing a large and diverse range of languages, rather than by a need to apply a given standard. Therefore different standards apply to different languages. Of particular concern, it is currently possible for an interpreter:

- in a Core language to be registered for Standard assignments with no interpreting experience and an interpreting qualification below RQF Level 2 (GCSE equivalent).
- in a Core language to be registered for Complex Written assignments with no relevant experience (but with a professional qualification).
- in a Rare language to be registered for Standard assignments with no specified minimum hours of experience and without qualification.



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- in a Rare language, where English is a first language, to be registered for Complex assignments with no experience (and only a language assessment).

It is understood that these are minimum requirements and in practice such registrations may occur only rarely or in cases of exceptional or urgent need but the requirements as currently described offer no mitigation or additional controls where risk is identified. Current experience requirements that vary from 0-100 hours are substantially below those expected of professional interpreters and the criteria set out by professional, membership and regulatory organisations. In the applied context of service delivery within MoJ, varying work volumes across different languages and some of the challenges set out above, a flexible approach is needed in terms of ways in which experience can be gained and how hours of experience are calculated.

### Experience requirements in other organisations

The Police-Approved Interpreter & Translator scheme (PAIT) scheme adopted a 'qualification plus experience' model when it launched in 2021. In addition to qualifications, an interpreter registering as a Full or Legacy PAIT must evidence 400 hours of public service experience including 50 hours of police work. A Temporary or Rare Language PAIT is required to have 100 hours of public service experience of which 30 hours must be police work.

The experience requirement for membership of the Chartered Institute of Linguists (CIOL) is dependent on the level of qualification(s) presented on application. A Level 6 qualified interpreter is expected to have a minimum of 3 years professional practice, a Level 7 qualified interpreter a minimum of 2 years professional practice. Application for Full membership by experience requires evidence of 5 years of professional practice. Professional practice is measured as a minimum of 120 working days a year.

Entry criteria for Qualified Interpreter membership of the Institute of Translation and Interpreting stipulate a balance of qualifications, references and evidence of days/hours worked. A point system credits the interpreter with points towards an overall eligibility score with more points awarded the greater the experience they can evidence up to a maximum of 210 days or 1400 hours. This should be in their interpreting specialism which includes a Police and Courts option.

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### Evaluating experience

The most widely used measure of experience for interpreting in the public sector is the established NRPSI standard. When NRPSI was founded in 1994, the DPSI had been operational for only 5 years (the timeframe allowed for completion of the qualification). The requirements for registration were therefore balanced in favour of experience with full registration requiring 1000 hours. This provided access to NRPSI for interpreters who had gained substantial interpreting experience over time but had never been objectively tested, while allowing time for the number of DPSI qualified interpreters to grow. The criteria were revised in 2001 to include separate Interim and Full Status registrations. For Full Status interpreters were then required to have a professional qualification plus 400 hours experience. There is no documented case supporting the rationale for setting the experience level at 400 hours (a decision taken jointly by a CIOL/NRPSI committee) but 400 hours has remained the requirement for NRPSI full status through to the present. For rare languages, the experience requirement is considerably lower at 100 hours. For annual renewal evidence of 10 hours of public service interpreting work is required.

Similar experience requirements to NRPSI's are used by professional bodies and membership organisations as criteria for membership, though these may be calculated and assessed in different ways to reflect the different purposes of the organisations. In general, professional and membership bodies do not differentiate experience requirements for rare languages.

Members of the professional, membership or regulatory organisations work within the scope of a recognised Code of Conduct. These typically reflect one of the recognised competences of a professional interpreter, the ability to research and prepare for assignments (National Occupational Standards for Interpreters). NRPSI's Code of conduct states that *'practitioners shall only accept work which they believe they have the competence both linguistically and in terms of specialist knowledge or skill to carry out'*. In respect of subject competence CIOL's code of conduct explains that this *"means their familiarity with the specialist field(s) involved in the work, whether through formal qualifications, experience, research, self-guided learning or training (formal or informal)"* which describes a number of alternative sources that might be considered as alternatives to practical experience. Building expertise and new specialisms is a natural part of an interpreter's professional development and these activities can provide a useful additional measure through which experience can be evaluated.

For rare languages, gaining direct experience has an extra challenge as demand tends to be lower, deployments fewer and experience is therefore harder to build. In such cases acquiring the equivalent of experience through training and development is particularly important.

In respect of the three core competences, experience can play a critical role in helping an interpreter to fill competence 'gaps' that have not been met through qualification. For example, an interpreter holding a BA Interpreting qualification meets only two of the three competences, language and

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interpreting. A means through which they could gain experience of legal contexts and terminology would enable them to provide evidence of that third competence.

Through discussion with stakeholders from the profession, a number of possible sources of activity to supplement direct experience were identified. They include:

- focussed CPD or training; identifying specific needs to fill recognised gaps in competence, for example the existing online training module which serves as an introduction to the MoJ and the structure of courts and tribunals. Other topics might include introductions to specific crimes, tribunal types and terminology, remote interpreting, practices to support different modes of interpreting, improving sight translations etc.
- the use of scenario-based assessments such as mock courts (part of London Metropolitan University's PSI training) that could substitute for live experience. This might include follow-up conversational assessments/appraisals of performance where the interpreter has to reflect on their work;
- formal in-person assessments or informal assessments carried out by the Quality Assurance service provider;
- verified attendance at court, peer shadowing in live courts, mentoring or buddy schemes.

For interpreters in languages where there is no qualification, a more extensive range of experience may be required to provide sufficient evidence that all competences for a particular standard have been met. In such cases, the interpreter relies solely on experience without the benefit of certified skills gained through qualification, and it would be reasonable for this to be compensated for by a requirement for a higher number of hours experience.

In summary, experience requirements would benefit from greater consistency across all languages and all levels. Experience should be mandatory but comprise of both direct and indirect means of evidencing interpreting in practice as well as knowledge of legal contexts and terminology. Levels of experience required should reflect the specific context of MoJ assignment, the limited justice-specific opportunities available and the wide range of languages to which requirements apply. These should be set between the limits of the current requirements which are relatively low and the recognised higher professional standards – a range between 200 and 400 hours seems reasonable.

*Recommendation 8: Experience requirements should reflect the challenges of delivering a language service in a complex setting where a multiplicity of languages is required. Where possible, experience levels should be the same across all languages, be set at a level where this is achievable and be sufficiently flexible for experience to be evidenced in a variety of ways, from worked assignments and live experience to a range of other supplementary or developmental activities. 200-400 hours is reasonable.*

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*Recommendation 9: Set an experience requirement that recognises different routes to registration either through qualification plus experience or through experience alone. An experience alone route should require a higher number of hours of experience as a substitute for qualification. Required hours should take into account widely accepted professional standards adapted to the context of a complex service delivery environment.*

### RARE LANGUAGES

Different interpreter requirements currently apply to *core* and *rare* languages, also referred to as *standard languages* and *languages permitted exceptional requirements*. There are 46 core languages and 152 rare languages. Core languages include languages of greater diffusion e.g. Dutch, Mandarin and Russian as well as languages of lesser diffusion e.g. Armenian, Kurdish (Sorani) and Vietnamese. Rare languages can include widely recognised languages e.g. Swedish and Korean as well as some lesser known e.g. Hakka (China), Babani (Cameroon) and Zarma-Songhay (West Africa). The reason for these grouping derives from the definition of a rare language: *a language with no available DPSI qualification*. It is a historic definition that is used widely across public service interpreting organisations and by the Police Service that has less relevance in the current qualifications market. The DPSI remains the primary, but is no longer the sole, professional PSI qualification and both the DCI and DPI meet relevant professional standards with appropriate legal context. A listing of core and rare languages can be found in Appendix H.

It would be ideal if professional qualifications existed for all languages required by MoJ which would eliminate the need for a distinction between core and rare languages. Commercial realities prevent the development of qualifications in languages for which there would be very low demand. An inherent risk results from TQUK's withdrawal<sup>6</sup> from the interpreting qualification market, especially as it had opened up qualification in a number of rarer languages, and it is likely to become even more difficult to secure a steady and reliable source of appropriate qualifications. Creating new formal qualifications for rare languages is time-consuming and costly, requiring significant language-specific input. Rare language candidate numbers are necessarily low and awarding organisations are reluctant to invest in development when candidate revenue is unlikely to outstrip development and delivery costs.

Past attempts have been made by stakeholders to increase the range of languages provided for and thereby reduce the number of 'rare languages' but only with limited success. An Albanian DPSI has recently been developed demonstrating that coordinated action on this, led by MoJ and supported by stakeholders and the profession, could help to identify further languages in which there are considerable interpreter numbers but no qualification. By stimulating qualification development in

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<sup>6</sup> Since this report was completed in June 2022, TQUK's portfolio of interpreting qualifications has been transferred to iCQ (icanqualify).

## Review of Qualifications and Experience Requirements for Spoken Language Interpreting

this way, it has been suggested that the rare language list could be reduced by up to a half over time, at the same time increasing the number of professionally qualified interpreters.

*Recommendation 10: MoJ to coordinate activity with the profession, service providers and stakeholders to identify rare languages with higher numbers of interpreters with the aim of developing qualifications and/or assessments, reducing the rare language list and increasing the number of interpreters with professional qualifications.*

The separation of core and rare languages based on the availability of a qualification is artificial and perpetuates requirements that are significantly different for each group. The nomenclature itself carries negative connotations of difference and level of importance. A new framework with sufficient flexibility to define requirements without this artificial divide may remove some of the unintended stigma attached to the title 'rare'.

In addition to the risk posed by rare language interpreters not having access to qualifications, there are a number of other specific factors that apply to these languages:

- the restricted pool of speakers in the UK in some languages from which to draw new interpreting expertise. There is, for example, one language which has just a single interpreter in the whole of the UK. Rare language communities are usually small in number and known to each other which can challenge an interpreter's impartiality due to a much higher than usual likelihood of an interpreter having connections with the person or people for whom they are interpreting.
- lack of familiarity with contemporary language as it evolves. This is particularly the case where an interpreter is a second or third generation heritage speaker and has learnt the language in a home environment where immediate family members have also been away from their country of origin for some time. Language lives and evolves and without regular exposure to the language in current contexts, it can quickly become dated, restricted in terms of domains, or fail to keep abreast of new terminologies e.g. new tech, modern slang etc.
- the difficulty interpreters can have in gaining substantive or sufficient experience. In languages of low demand, experience may be limited to work within local community settings. Without regular deployments at professional level it can be hard to demonstrate competence or to attain the required experience levels. Bookings are typically low in volume reducing the opportunities for experience to be gained.
- languages with only spoken forms. Languages such as Sylheti which only have an oral form (Sylheti uses Bengali for written communication) have more complex assessment needs as spoken and written/translation assessment need to be prepared separately and may require different assessors.
- unfamiliarity with the rare language script. Some interpreters with good oral skills at the required level may have no knowledge of the rare language script. They have valuable and useful skills in

## Review of Qualifications and Experience Requirements for Spoken Language Interpreting

spoken interpreting but are unable to offer written translations or sight translation from a rare language text.

- the concentration of rare language qualifications at lower levels. The distribution of MoJ registered interpreters by qualification shows relatively high numbers qualifying in vocational qualifications, particularly with Level 2 and 3 Certificates in Community Interpreting. These qualifications are mostly taken by non-English first language speakers to qualify for work within their communities. A level 3 qualification certifies an interpreter at a community level to interpret in many different public service settings but does not include preparation for legal work. Evidence suggests that there are sufficient opportunities for interpreters to work and earn within these public service settings and that there may be little benefit perceived in the time and costs required to upskill to Level 6 when only limited additional work at professional level is available.

In a framework where the same core competences are required of all language interpreters deployed on professional level assignments, whether core or rare, it is important that alternative means and methodologies are found for rare language interpreters to demonstrate and evidence their competences despite there being no formal qualification available.

Most rare language interpreters are first language speakers and are required to prove their second language competence through English language qualifications. Cambridge, ESOL, IELTS and TOEFL can all provide suitable evidence of English levels. For English first language speakers offering the rare language as a second language, there are very few opportunities for formal assessment. Interpreting skills might be demonstrated through prior experience, by non-accredited assessment, service provider testing, or through verifiable references. For English and non-English first language speakers, evidence must include proven competence in all the different modes of interpreting required for MoJ assignments. They must also be able demonstrate an understanding of legal contexts and relevant terminology through for example prior experience including in related settings e.g. police work, non-accredited assessment, service provider testing or verifiable references.

### Current rare language requirements

Current requirements for rare language interpreters accept lower-level qualifications than for core languages. As previously described the same standards should apply to core and rare languages, the only difference being how core competences are evidenced. It does not necessarily follow of course that rare language interpreters, without qualification, are not performing effectively nor that they are performing at a level below their core language peers, only that current requirements could allow that to be the case.

Rare language requirements were reviewed in the Qualifications section and are not repeated in full here. However, the following points are reiterated and highlighted as particular concerns:

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- The descriptor 'Experience of providing interpretation services in the relevant language' for Standard assignments has no mention of public service or legal contexts and no minimum hours requirement.
- Registration at Complex level requires just language assessment or 50 hours minimum experience or a qualification ranging from basic level/level 2 Community Interpreting through to a partial DPSI.
- Complex Written registration stipulates a qualification at degree level or higher (although several of those listed are unrelated to interpreting), native English or English Proficiency, and a minimum of 100 hours interpreting experience, again without stipulating a requirement for legal specialisation.

There is a clear level of risk that a rare language interpreter could register with very low-level qualifications, very little or no interpreting experience and no grasp of legal contexts and terminology. This risk is exacerbated by the MoJ's legal obligation to provide an interpreter in court, often in difficult to source languages in a particular venue at a particular time, when the demand for such is infrequent and highly unpredictable. Balancing standards and legal obligations remains a challenge in these languages.

*Recommendation 11: Explore the potential for RQF Level 3 (or equivalent) qualification, or if necessary, a specially prepared equivalent level assessment, to be used to assess the knowledge and skills of all rare language interpreters who do not have formal qualifications at this level to provide a base-line assurance of interpreting service quality.*

A new framework should aim to consider all languages equally but the unique nature of rare languages means that special consideration is always likely to apply in some form to these languages. There is a danger that the defined professional and community levels of qualification may affect the supply of interpreters with relevant qualifications or experience and adversely impact the availability of interpreter resource for critical assignments. An in-depth analysis of booking volumes, assignment levels and interpreter registrations in specific languages would provide further data from which risk can be calculated more accurately and further measures be implemented to manage it. It would also help to identify where there are gaps in interpreter supply and where interpreter resource needs to be developed.

This introduces the concept of a risk-based approach to deployments where, if fulfilment cannot be achieved at the relevant professional or community booking level, additional measures apply. This would enable MoJ to fulfil their legal obligation to provide an interpreter, even in exceptional circumstances, where no other alternative is available. The national police PAIT scheme includes a process, which also existed within the former National Agreement, whereby when exceptional circumstances apply a named individual is responsible for authorising the deployment and ensuring that any additional monitoring measures are in place.

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### Rare language requirements in other contexts

The Police PAIT scheme has a special Rare Language status requiring proof of language and interpreting competence (from the service provider) and evidence of 100 hours practical experience in public service interpreting of which half must be in police work.

Rare language interpreters registering with NRPSI must evidence proof of English level at IELTS band score 7.0 or above. This is equivalent to CEFR level C1. Other qualifications that test this level include Cambridge English: Advanced (CAE) and Cambridge English: Proficiency (CPE). NRPSI makes no statement of requirement to prove rare language competence, presumably on the unstated assumption that rare language interpreters are not usually English first language speakers and there is therefore no requirement for assessment of the rare language. 100 hours of practical experience in public service interpreting apply.

Other professional bodies do not generally differentiate admission requirements by language, applying the same standards to all applications, differing only in the types of evidence that are provided and therefore the manner of their evaluation.



## ASSIGNMENT TYPES & INTERPRETER DEPLOYMENTS

### SCOPE OF ASSIGNMENTS

The services of an interpreter may be required by any of the 19 Commissioning Bodies listed in the MoJ Language Services contract and booked to work on one of over a thousand assignment types in use across all jurisdictions. Assignments are categorised by jurisdiction and type of hearing with some hearing types replicated across multiple jurisdictions. Assignments differ in terms of the length of deployment (from 20 minutes to several weeks or, in some cases, months), its assigned complexity (see below), mode of delivery (face-to-face, remote or hybrid), purpose (adversarial, inquisitorial, facilitative) and location (geographic and type of venue). The skills required of the interpreter are mostly consecutive interpreting but also include simultaneous oral interpreting, sight translation (mostly from English but also into English) and short written translations.

### BACKGROUND TO ASSIGNMENT ‘COMPLEXITY’

Each assignment type has an assigned complexity level – Standard, Complex, or Complex Written – Complex being the level to which the majority of types are assigned. A different qualifications and experience requirement is defined for each level of complexity.

This has worked differently in the past. The National Agreement<sup>7</sup>, which governed the use of interpreters in police and court settings up to 2012, required an interpreter to be registered with NRPSI at Full or Interim status with the DPSI Law. This requirement applied to all bookings but included a provision, in the case of determined but unsuccessful sourcing from the Register, that an interpreter be obtained from a published list of alternative sources, primarily from professional bodies or membership organisations. There was no differentiation of interpreter requirement by assignment type.

Outsourcing in February 2012 to Applied Language Services (ALS) (acquired by Capita TI in advance of the contract start) introduced the concept of differentiated interpreter bands with ALS creating a three-tier system where each tier was defined in terms of interpreter skills, qualifications and experience. Interpreters were registered to a particular tier and were eligible to work on a pre-determined set of assignments linked to the tier. Court and legal interpreters as well as the professional and membership bodies representing public service interpreters strongly opposed tiering for its erosion of the earlier single standard set by the National Agreement and its undermining of the outcomes of the Nuffield Interpreter Project in the late 1980s. It was seen to undo the work by legal and interpreting professionals to ensure equal access to justice for non-English speakers and to undermine the value of two key outcomes of earlier work, the DPSI – the first professional

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<sup>7</sup> National Agreement on Arrangements for the Use of Interpreters, Translators and Language Service Professionals in Investigations and Proceedings with the Criminal Justice System (revised 2007)

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interpreting qualification of its kind – and the National Register for Public Service Interpreters (NRPSI).

The National Audit Office (NAO) report *The Ministry of Justice's Language Services Contract*, published in September 2012, found the tiering system had been introduced without having been properly proven. It was also heavily criticised as “*an untested system*” in the February 2013 Justice Committee report *Interpreting and Translation Services and the Applied Language Services Contract*. Tier 1 interpreters were fully qualified or accredited professional interpreters with oral and written competences. Tier 2 interpreters were partially qualified or held a variety of other certifications or accreditations that did not fully meet the requirements of the recognised professional standard. Interpreters in both Tiers were expected to have 100 hours of public service interpreting experience. Tier 3 interpreters had only to evidence ‘experience in the public service sector’ (no mention of law), ‘appropriate linguistic ability’, or ‘basic interpreting training’. 100 hours of experience (not defined) were ‘desirable’.

Tiering fundamentally changed the standards expected of interpreters working for the MoJ with Tiers 2 and 3 offering eligibility to work to many who were not qualified to previous standards. The Justice Committee report provides evidence at the time from a professional expert that the only acceptable tiering would be a differentiation between fully qualified interpreters with spoken and written competence and those qualified only with spoken competence. Tiering resulted in many public service interpreters leaving the profession as a direct result of this perceived undermining of professional standards previously recognised by the justice system.

At retendering in 2016, tiering was replaced by complexity levels. In a subtle shift of focus from interpreter skills to assignment complexity, work was undertaken to classify assignment types into three levels of complexity. The selection of an interpreter would be determined by the complexity level of the assignment. Each level (Standard, Complex Other, Complex Written) had its own interpreter qualifications and experience requirements. The complexity levels were set by HMCTS after consultation with jurisdictional leads and individuals within the courts and tribunals service but the detail of the basis on which decisions were reached is no longer available. Consultations with HMCTS staff for this review indicate broad overall support for the allocation of complexity to each of the assignment groupings. In contrast, interpreters continue to voice concerns about how the system of complexity levels works, the lack of transparency and how effectively the current requirements serve the needs of the MoJ. Concerns relate primarily to what is perceived as a dumbing down of standards and the potential compromise to justice and due process which has had a negative impact on both interpreters and the reputation of the profession. Substantial mistrust persists within the interpreting community relating to the rigour and quality of the language service being provided.

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### CURRENT COMPLEXITY LEVEL DESCRIPTORS

<b>Complex - Written</b>	Either: <ul style="list-style-type: none"><li>• where specified as Complex – Written by the relevant Commissioning Body in the Booking; or:</li><li>• where there is no Complexity Level specified in the Booking, the criteria for Standard do not apply and there is a requirement for written translation.</li></ul>
<b>Complex - Other</b>	Either: <ul style="list-style-type: none"><li>• where specified as Complex – Other by the relevant Commissioning Body in the Booking; or:</li><li>• where there is no Complexity Level specified in the Booking, the criteria for Standard do not apply and there is no requirement for written translation.</li></ul>
<b>Standard</b>	Either: <ul style="list-style-type: none"><li>• where specified as Standard by the relevant Commissioning Body in the Booking; or:</li><li>• where there is no Complexity Level specified in the Booking and:<ul style="list-style-type: none"><li>- the Booking does not involve the giving of evidence; and</li><li>- any one of the following criteria have been identified at the point of Booking: first hearing; case management/setting a trial date; legal argument; application for bail; or the defendant/claimant has a good grasp of English.</li></ul></li></ul>

Without a documented basis for allocation of assignments to each level, the table above is the only reference point for understanding the basis for complexity levels.

Complexity is a relative concept and HMCTS staff and interpreting stakeholders understand complexity differently and in relation to their own professional fields. From an interpreter standpoint, the following characteristics are potential indicators of an assignment's complexity:

- consequences: high/life-changing vs low/reparable stakes
- nature of communication act: conflict/adversarial vs collaborative/facilitative
- setting and formality: trial vs meeting vs focus group vs supervision/visits
- communicative intent: formal vs informal, transactional vs interactional, questioning/elicitation/briefing/consultation/liaison
- context: number of speakers, face-to-face vs remote/telephone, length/pace of proceedings
- technique requirements: oral only (consecutive and/or simultaneous/whispered), reading (sight translation), reading and writing (written translation).

In evaluating complexity HMCTS staff were led by the context of the legal proceedings which, while overlapping with some of the above characteristics, are based on different principles.

Feedback from both HMCTS staff and the profession shows that some hearings listed as Standard – First/Preliminary Hearings, Telephone Interpreting, and Applications Hearings – are straight-forward, transactional, predictable assignments in the majority of cases and may be serviceable by interpreters with a more limited skillset or less extensive experience. Subsequent case-management hearings however, some also listed as Standard, which take place during later proceedings were generally deemed to be less predictable with the potential to quickly develop in complexity and

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therefore require a broader interpreter skillset. The listing of legal argument as a Standard assignment seems in particular to be misplaced given the very specific legal terminology that this can entail and it is recommended that this should be classed as a Complex assignment.

The inclusion in the Standard descriptor of cases “where the defendant/claimant has a good grasp of English” is inappropriate. The level of English would not have been tested, is not measurable in the moment and is immaterial in the face of legislation that provides for the right to interpreting assistance for any non-English speakers. As soon as the right to interpretation pertains, then the same quality of professional interpretation must be provided irrespective of the extent of the defendant/claimant’s ability to understand English.

When considering the descriptors above, it is clear that current complexity levels are defined largely by exclusion with only the Standard level descriptor identifying specific assignment types. Standard level also collectively brings together assignments that are ‘non-evidential’. Complex-Other level (commonly referred to as Complex) is defined only by excluding the higher and lower levels i.e. not Standard, and not requiring written translation and by default therefore includes any assignment involving the giving of evidence. Complex-Written is defined on the basis of a requirement for writing/translation skills. It is a means of identifying Complex assignments that have a specific written requirement and specifically excludes all Standard assignments. These are not clear, transparent descriptors and do not give sufficient detail on which a sound evaluation can be made about the relevance and suitability of the level designation for a particular assignment type. Without this, it is also difficult to determine whether the criteria for interpreter requirements at each level are appropriate. Without better explanation of how well-matched individual assignments are to their designated complexity level, it is not possible to assess fully how well interpreter requirements are matched to the complexity of the assignment.

*Recommendation 12: A three-tier system of complexity levels is overly complicated particularly when there is a level of opaqueness about how levels are allocated. There is a resulting challenge in ensuring that the interpreter requirement properly matches the assignment type and its designated complexity level. Consideration should be given to reducing this to two tiers in line with recognised professional and community interpreting standards.*

The current naming of complexity levels and the interpreter standards to which they relate hold an inherent incompatibility. This review has identified a professional ‘standard’ (RQF Level 6 or equivalent competence). This professional ‘standard’ represents the interpreter requirement for work at Complex and Complex Written levels. In contrast, ‘Standard’ assignment types are those which were considered by HMCTS staff and the profession as potentially serviceable by interpreters with a more limited skillset or less extensive experience, equating more closely to a community level. Confusion and misunderstandings readily arise when a reference to ‘standard’ is used and understood differently by parties involved. There is an obvious risk that a legal professional making

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a booking for a 'Standard' assignment is expecting an interpreter of a professional 'standard' when this is not the case.

The risk is real as consultations with HMCTS staff reveal that when a Standard booking is made, there is an expectation that the interpreter is fully qualified with a full set of professional skills and techniques. It is not widely understood for example that a Standard level interpreter is not trained, or is likely to be inexperienced, in simultaneous interpreting or that they are likely to be untested in reading and writing skills. This underlines how critical it is that assignments, their complexity levels and interpreter requirements are accurately aligned.

*Recommendation 13: A new framework aligned to professional and community standards must use common terminology when referencing both assignments and interpreter requirements to ensure that standards, qualifications, skills and experience are clearly defined and that there is common understanding of the standards by all stakeholders.*

Some guidance is available to booking staff to help with understanding complexity levels and interpreter requirement, but it is limited. When the contract was retendered in 2016 new, additional guidance was provided in a note on complexity levels which specifically gave further details and examples of the sort of assignments that should always require a Complex level interpreter (fact finding, Family/Civil committal hearings, final hearings, complicated legal issues, vulnerable or intimidated victims/witnesses, trials and evidential hearings). However there is no clear introduction to and overview of the use of interpreters that would help to give those responsible for bookings a better understanding of the profession, interpreter skills and levels of competence.

*Recommendation 14: Review the guidance on complexity levels and interpreter requirements that is available for those booking interpreters and update or create new documentation with input from the profession so there is greater clarity for those requiring and booking interpreters concerning assignment types, levels, standards and skills.*

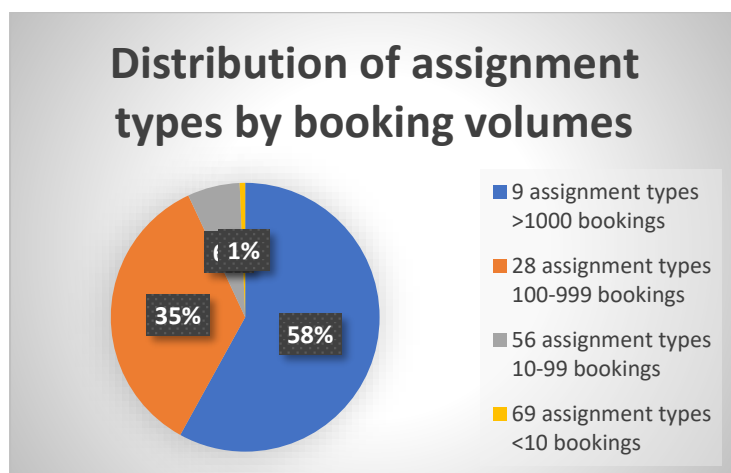
### VOLUMES AND DISTRIBUTION OF ASSIGNMENT TYPES AND INTERPRETER DEPLOYMENTS

1034 assignment types are listed on the interpreter booking form, each with a designated complexity level. 505 are at standard level and 529 at Complex level or above. These figures are not indicative of deployment volumes where data shows an average of 75% of all bookings are at Complex level or above.

A two-month snapshot of data was made available for this review. It showed the distribution of bookings for all assignment types during a period between February and April 2022 and that 161 assignment types (of the 1034 available) were used. Of these only a small number had a significant volume of deployments. 43% of types had less than 10 bookings and 15% had just a single booking. If typical, which service providers thought to be the case, this suggests a concentration of work on a

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relatively small range of assignment types which does not change significantly over time, particularly in respect of the most frequently used assignment types.



The following observations relate to this specific data set for the purpose of reviewing booking trends.

With regard to commissioning bodies, of the total bookings, a large majority (92%) were made by HMCTS, the remainder being made by the National Probation Service, NPS (6%) and other commissioning bodies (2%) (Cafcass, Crown Prosecution Service, Legal Aid Agency, Office of the Public Guardian and Public Prosecution Service). Of the HMCTS bookings, just over half (54%) were Crime, and just under a quarter Family (23%) and Tribunals (22%) respectively. 1% of bookings were Civil.

On distribution of bookings by assignment type, just under two-thirds (61%) of all bookings during the period were concentrated on the 10 most used assignment types, 9 of which had over 1,000 bookings. The most used assignment type (Tribunals – IAC Substantive Hearing) had a third more bookings than the next most highly used type (Family – Children’s Cases Private Law Further Hearing) and over four times as many bookings as the tenth most used assignment type (NPS Supervision Appointments Face-to-Face Interviews).

The profession has stated particular concern over Standard level assignments as these utilise interpreters who have not met the professional standard. Only one Standard assignment type appears in the ten most used types (Crime-Magistrates Court – Preliminary Hearing). It is the single most used Standard assignment accounting for 29% of all assignments booked at this level and 7% of all bookings. First or Preliminary Hearings appear separately as an assignment type against each jurisdiction but when considered together as a grouping, First Hearings, they are the most used assignment type at Standard level making up 9% of total bookings. Telephone interpreting is also listed against many jurisdictions and together these represent 3.5% of all Standard assignments (or less than 1% of total bookings). First hearings and telephone interpreting are typically, though not in every case,

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predictable assignments with little complexity that within the profession and the MoJ have been considered the most suitable for interpreters with more limited skills.

The data also provides useful contextualised evidence in relation to the assessment of risk and how it should be managed. It shows that bookings are concentrated on a small number of high-volume assignment types in regular use; that only around 15% of assignment types may be in use at any time; that Standard assignments are concentrated on first/preliminary hearings; and that the use of Standard assignment types is not frequent within the highest volume types (>1000 bookings). Ensuring that the most frequently used assignment types have been assigned the correct level and that therefore appropriate interpreter skills are assured, is critical.

Understanding better how assignment types are used, the volumes and distribution of bookings by type and the level assigned to different assignments, would benefit interpreters at professional or community level, by providing better insights into the types of assignment to which they are most likely to be deployed and allowing professional development and training to be targeted to meet the needs of the most regularly used assignment types. This would also address a frustration commonly reported by interpreters that they do not receive sufficient information about assignments at the time of booking which makes decisions about acceptance and preparation for a deployment once accepted much harder. Sharing more information about contexts, types, volumes and distribution would unquestionably help to alleviate some of the doubts and uncertainty felt by many in the profession and help to rebuild trust and respect.

*Recommendation 15: Consider reducing the number of assignment types, in consultation with interpreting and legal professionals, to reduce repetition and create a simplified set of assignment types where allocation to one of the two standards (professional/community) can be achieved with greater clarity.*

### **BOOKINGS, COMPLEXITY AND FULFILMENT**

Interpreter requests are made to the service provider through the service provider's online booking system. The booking request requires input of a named assignment type. This automatically assigns a complexity level to the booking which in turn determines the level of interpreter requirement. A booking offer is subsequently made by the service provider to all interpreters in the relevant language who are registered at the corresponding complexity level and who meet other criteria such as geographical proximity or any other special requests. Interpreters receiving the offer can respond and either accept or turn down an assignment based on factors such as the jurisdiction, the assignment type, location, duration etc.

Fulfilment takes three forms. Either an interpreter meeting the complexity requirement is available and accepts the booking; or an interpreter at the relevant complexity level cannot be sourced and the

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Commissioning Body may be asked to accept a lower-level booking; or no interpreter can be sourced through the service provider and an interpreter is sourced off-contract.

Interpreters, professional bodies and membership organisations have raised concerns over time about the number of bookings which are potentially downgraded and the reasons why this happens, with clear unease that standards may not be being upheld. Fulfilment data was available for the snapshot data from February to April 2022 showing the number of fulfilled assignments and the level of interpreters deployed against each assignment type. Despite each assignment type having a designated complexity level, in the ten most used assignment types (61% of bookings), there was evidence that interpreters were deployed from each of the three complexity levels. This can arise not only because an assignment has been downgraded but also because interpreters can accept bookings both at their registered complexity level and below. A Complex Written interpreter can, for example, also work Complex or Standard bookings. The fulfilment data was not broken down by language but having different standards for different languages may potentially be a cause of different levels of fulfilment. It was possible, however, to extrapolate from the data that for the ten most used assignment types over 98% of bookings were fulfilled at either the designated, or a higher complexity level. Extending the data set further to include the top twenty most used assignment types (81% of bookings) fulfilment at either the designated, or a higher complexity level, reached 99%. Many assignment types beyond the 20 most frequently used had extremely low numbers of bookings with many having just with one booking during the period. Any failure to meet the designated level requirement in such cases risks severe statistical distortion and were therefore not included in the analysis. However, it is noted that many of these bookings may have been in rare languages where fulfilment at the required level is more challenging.

*Recommendation 16: To obtain a full understanding of the extent to which interpreter requirements, complexity levels and fulfilment work together and whether quality standards are maintained, a more extensive data set is required including a breakdown by language and by complexity level.*

No hard data was available to identify the frequency with which a booking was downgraded, either by the service provider or by individual jurisdictions or venues. In consultations with HMCTS, staff reported that this might happen in a range from daily (in some very busy venues) to every 2-3 months, depending on jurisdiction, location and volume of bookings. They were reported as occurring more frequently in rare languages which is unsurprising. Whenever a request to change the level of a booking is made by the service provider, the designated interpreter's qualifications and experience are provided so that a considered decision can be taken. This responsibility lies with the judge or lead person in the proceedings. There is evidence from HMCTS bookings officers and managers that such requests are not taken lightly, are risk-assessed and actively managed but decisions also have to take account of legal considerations such as urgency to progress the case, the likely difficulty and challenge



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of a case, etc. This is another driver for the creation of additional guidance on interpreter requirements and bookings for staff.

HMCTS staff reported that issues of quality rarely arise as a result of downgraded assignments although it was unclear whether this would be captured unless it resulted in a total breakdown of communication. There was a substantial level of experience amongst the HMCTS staff consulted with many having spent extensive periods working with interpreter services either within MoJ or other government departments. This was significant in terms of the confidence and the quality of decision-making they brought to the bookings process. MoJ may wish to consider how this expertise is managed and retained in relation to the business and succession planning, the recruitment and development of new bookings staff and to the provision of guidance on bookings processes and policies. A full set of guidelines on working with interpreters does not currently exist but would be a helpful resource and reference point for all, but particularly for new personnel when staff turnover occurs.

*Recommendation 17: MoJ to consider how knowledge and expertise held by bookings officers and managers is managed and retained over time, considering succession planning, recruitment and training and development of new staff.*

Where no interpreter can be supplied by the service provider and the booking cannot be fulfilled, officers have provision to source an interpreter off-contract to progress proceedings and avoid delay or cancellation of a case. Off-contract requests are generally directed, but not limited, to interpreters registered with NRPSI and local booking officers are responsible for seeking interpreters who meet requirements and quality, although decisions often have to be reached based on limited available information. This presents a significant risk to the MoJ. It circumvents the formality of contracted requirements and places the deployment outside the normal monitoring and quality assurance processes of the contract. A better solution would be to introduce an exceptions policy for off-contract bookings which would require formal approval from an authorised responsible person. Such bookings should be recorded centrally for monitoring purposes and would provide better protection for all as it would enable risk management policies to be applied.

HMCTS staff also raised concerns about the rapidly increasing numbers of off-contract bookings which happened most frequently for rare languages. It was reported by more than one venue that in some instances interpreters appear to purposefully remain outside of contract arrangements, firm in the knowledge that their language is in demand and that off contract bookings will continue to be offered for which bespoke fees, terms and conditions can be negotiated.

*Recommendation 18: Future framework arrangements should provide for the recording centrally of all downgraded, exceptional and off-contract deployments. An exceptions policy would help to ensure that additional measures can be applied to such bookings and that extra quality assurance processes*

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*are in place where an interpreter is engaged outside the specified standards, levels and qualification requirements. The aim overall must be to reduce the number of off-contract bookings.*

### OTHER BOOKING-RELATED CONCERNS

Consultations with HMCTS staff revealed other areas of concern that impact on interpreter requirements and fulfilment of booking requests. There are some circumstances e.g. first appearances in Magistrate's Court which are urgent and require immediate interpreting provision. Other assignments benefit from longer lead-in times allowing for advance planning. Staff reported that in some cases initial internal requests to the bookings team were not made in good time or that a language/dialect was requested that had not been properly identified. In other cases booking requests made in good time (several months in advance) to the service provider were only processed when HMCTS staff started to chase for a response. These both impact on interpreter deployment as any significant delay in planning and booking leads to pressure on the process and an increasing likelihood that a suitably qualified interpreter at the right level won't be available. At worst, such delays result in failure to source an interpreter through contractual arrangements and place even greater reliance on off-contract bookings with all the associated risks.

Staff were also concerned at the increasing occurrence of late cancellations by interpreters following the Coronavirus pandemic. Pre-pandemic the majority of assignments were attended hearings with interpreters travelling to venues to appear in person. For judicial proceedings to continue under pandemic restrictions, much of this work moved to virtual or remote trials and hearings to protect health and to comply with Covid regulations. When these restrictions were lifted and face-to-face proceedings restarted, interpreters responded by increasingly asking to attend remotely via the Cloud Video Platform (CVP). It seems that having experienced an alternative practice, interpreters were now less willing to spend time and money travelling to court and were accepting assignments selectively with this in mind. Increasingly in cases where a judge ruled that proceedings must be attended and insisted on an in-person attendance, a booked interpreter would request to join remotely and if this were not approved, would cancel the booking, often at late notice. With such late notice, finding a replacement becomes increasingly difficult and may again result in more off-contract bookings.

Linked to the above, interpreters, professional bodies and membership organisations are concerned about the lack of information available to interpreters at the point of accepting an assignment. Once booked, a professional interpreter expects to prepare, and possibly research, in advance of an assignment in order to be confident that they are working within their competence and that they are familiar with any relevant subject matter. Information in the booking offer is restricted to practical details of location, date and time and a simple assignment descriptor. Some booking officers may add a brief description as free text. A small number of other details about the booking are given once the interpreter has accepted the offer. There are several drawbacks to this. Interpreters are likely to specialise in particular areas of work and build up knowledge and experience within a particular

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jurisdiction in order to extend their expertise and offer best quality services. Without booking details, they are unable to select assignments most suited to their personal skillset and ongoing development. Some assignments may be short, straight-forward, procedural cases, while others are lengthy, complex trials sometimes dealing with emotionally difficult or distressing issues. Again an interpreter will select assignments on the basis of these details. For example, a recently qualified interpreter with limited experience may not wish to commit early on in their career to the length and complexities of a high court trial. And although professional interpreters are trained to work independently and without bias in many different and difficult circumstances, the nature of some of the content they face on MoJ assignments can still be distressing or disturbing. It is in the interests of all concerned that an interpreter booked for such an assignment is aware, prepared and ready to deal with this but needs sufficient information in advance of accepting an offer to make a considered decision. This avoids difficulties arising at a late stage both for the interpreter and for the court, should the interpreter feel unable to continue, which could potentially cause a delay or postponement of proceedings.

*Recommendation 19: Adding further details to the booking offer including a case overview, particular skills required or any significant features of an assignment (e.g. distressing/disturbing content or high media profile) would ensure that a booked interpreter is fully aware of the context and content of the case and prevent unnecessary delays or cancellations.*

### ASSIGNMENTS, COMPLEXITY AND INTERPRETERS

In summary, several factors have been identified that help to explain professional interpreters' unease with the current system of complexity levels:

- The standards to which interpreters work are not understood in detail by bookings teams.
- The nomenclature used to describe assignment levels and interpreter requirements is different and can lead to conflict and confusion.
- The range of assignment types is complex and is not transparent to interpreters.
- The rigour with which bookings are made and the degree to which standards are upheld has not been clear to the profession.
- The relationship between standards, languages, requirements and assignments has not been fully explored and analysed.

### RECOMMENDATIONS

Recommendation 1: In recognition of the specialist nature of interpreting work, the title of *interpreter* should be used in all contexts and documentation relating to MoJ contracted interpreting services. For ease of use or reference, in this context only, the title refers to those who are professionally qualified, community level interpreters or, exceptionally, others providing an interpreting service within the limits of this contract.

Recommendation 2: National and international qualifications frameworks recognise the equivalent of RQF Level 6 as the standard required for professional activity. This level defines the knowledge and skills required to undertake professional activity and assignments. Language frameworks and related language assessment schemes have been mapped against these frameworks. Equivalences, although not always absolute, can be drawn to demonstrate in each case where professional standards are met. The key, relevant language standard in this respect is the CEFR level C1. These professional levels and standards should be used when defining standards for MoJ language services.

Recommendation 3: Interpreting standards exist nationally and internationally to describe the competences, knowledge and skills required to undertake professional legal interpreting work. These are based on principles derived from study, research and practice and provide a theoretical framework for the development of qualifications, the mapping of educational programmes and the management of professional activities. A professional standard, RQF Level 6 or CEFR C1, is the equivalent of a Bachelors degree programme. A community standard, RQF Level 3, is the equivalent of a UK A-Level and provides for interpreting in community settings. Each standard has one or more established and respected qualifications accrediting interpreters with the knowledge, skills and techniques, including language skills, modes of interpreting and specialist sector expertise, at the relevant standard. MoJ should consider applying these recognised standards, at two levels, to the provision of MoJ interpreting services recognising both a professional and community level.

Recommendation 4: Interpreters who do not meet the minimum community standard equivalent to RQF Level 3, or are unable to present suitable equivalent evidence and/or experience, should not be included in the MoJ interpreters' listing. They should be encouraged to undertake training or development to qualify at community level. This guarantees a base-line competence and reassurances on fairness and justice to all stakeholders within MoJ language services delivery.

Recommendation 5: An analysis of interpreter registrations where qualifications are only partially completed should be undertaken to reveal the causes. Where this is due to a different script and lack of reading/writing skills, consideration should be given to where and how the interpreter is best deployed. In cases of intentional non-completion for the purpose of reaching minimum registration requirements, processes should be identified and implemented to encourage interpreters to become fully qualified. This might include time-limiting registration until full completion is achieved.

## **Review of Qualifications and Experience Requirements for Spoken Language Interpreting**

Recommendation 6: An experience requirement should apply to all registrations across all languages and all levels. In exceptional circumstances, where qualification and/or experience requirements cannot be met, but use of an interpreting resource is unavoidable, additional measures should be applied during preparation for the assignment, to assess performance and manage any potential risk to MoJ.

Recommendation 7: The move to use of remote interpreting services, exemplified by the response to Coronavirus restrictions, requires an additional interpreter skillset in respect of technical skills and practice. Interpreters should receive training or CPD on the specifics of the MoJ Cloud-Video-Platform (CVP) and longer term be assessed on remote interpreting as part of the skillset requirements.

Recommendation 8: Experience requirements should reflect the challenges of delivering a language service in a complex setting where a multiplicity of languages is required. Where possible, experience levels should be the same across all languages, be set at a level where this is achievable and be sufficiently flexible for experience to be evidenced in a variety of ways, from worked assignments and live experience to a range of other supplementary or developmental activities.

Recommendation 9: Set an experience requirement that recognises different routes to registration either through qualification plus experience or through experience alone. An experience alone route should require a higher number of hours of experience as a substitute for qualification. Required hours should take into account widely accepted professional standards adapted to the context of a complex service delivery environment.

Recommendation 10: MoJ to coordinate activity with the profession, suppliers and stakeholders to identify rare languages with higher numbers of interpreters with the aim of developing qualifications and/or assessments, reducing the rare language list and increasing the number of interpreters with professional qualifications.

Recommendation 11: Explore the potential for RQF Level 3 (or equivalent) qualification, or if necessary, a specially prepared equivalent level assessment, to be used to assess the knowledge and skills of all rare language interpreters who do not have formal qualifications at this level to provide a base-line assurance of interpreting service quality.

Recommendation 12: A three-tier system of complexity levels is overly complicated particularly when there is a level of opaqueness about how levels are allocated. There is a resulting challenge in ensuring that the interpreter requirement properly matches the assignment type and its designated complexity level. Consideration should be given to reducing this to two tiers in line with recognised professional and community interpreting standards.

Recommendation 13: A new framework aligned to professional and community standards must use common terminology when referencing both assignments and interpreter requirements to ensure

## **Review of Qualifications and Experience Requirements for Spoken Language Interpreting**

that standards, qualifications, skills and experience are clearly defined and that there is common understanding of the standards by all stakeholders.

Recommendation 14: Review the guidance on complexity levels and interpreter requirements that is available for those booking interpreters and update, or create new documentation with input from the profession so there is greater clarity for those requiring and booking interpreters concerning assignment types, levels, standards and skills.

Recommendation 15: Consider reducing the number of assignment types, in consultation with interpreting and legal professionals, to reduce repetition and create a simplified set of assignment types where allocation to one of the two standards (professional/community) can be achieved with greater clarity.

Recommendation 16: To obtain a full understanding of the extent to which interpreter requirements, complexity levels and fulfilment work together and whether quality standards are maintained, a more extensive data set is required including a breakdown by language and by complexity level.

Recommendation 17: MoJ to consider how knowledge and expertise held by bookings officers and managers is managed and retained over time, considering succession planning, recruitment and training and development of new staff.

Recommendation 18: Future framework arrangements should provide for the recording centrally of all downgraded, exceptional and off-contract deployments. An exceptions policy would help to ensure that additional measures can be applied to such bookings and that extra quality assurance processes are in place where an interpreter is engaged outside the specified standards, levels and qualification requirements. The aim overall must be to reduce the number of off-contract bookings.

Recommendation 19: Adding further details to the booking offer including a case overview, particular skills required or any significant features of an assignment (e.g. distressing/disturbing content or high media profile) would ensure that a booked interpreter is fully aware of the context and content of the case and prevent unnecessary delays or cancellations.

# Review of Qualifications and Experience Requirements for Spoken Language Interpreting

## REFERENCES

- Cambridge Assessment English (2018), *Comparing scores to IELTS*.
- CIOL (2022), Professional Language Levels Framework.
- CIOL (2022), Working Language Levels Framework.
- CIOL (2009). *Independent Review on the future of the national register of public service interpreters Ltd*.
- Committee of Public Accounts (2012). *The Ministry of Justice's Language Services Contract*. London: House of Commons.
- Council of Europe (2018). *Common European Framework of Reference for Languages: Learning, Teaching, Assessment. Companion Volume with new descriptors*.
- HM Courts and Tribunals Service (2021). *CVP Interpreter and Intermediary Guidance*.
- ISO (2014). *Interpreting – Guidelines to Community Interpreting (BS ISO 13611:2014)*.
- ISO (2019). *Interpreting Services – Legal Interpreting – Requirements (BS ISO 20228:2019)*.
- Judicial Council on Cultural Diversity (Australia) (2022). *Recommended National Standards for Working with Interpreters in Courts and Tribunals*. Australia.
- Justice Select Committee (2013). *Interpreting and Translation Services and the Applied Language Solutions Contract*. London: House of Commons.
- Lord Auld (2001). *Review of Criminal Justice System*. (Interpreters, §155-162)
- Ministry of Justice (2016). *Agreement relating to the Provision of Language Services – Spoken Languages (Lot 1)*.
- Ministry of Justice (2022). *Criminal court statistics quarterly, England and Wales, July to September 2021*.
- Ministry of Justice (2018). *Guide to language interpreter and translation services in courts and tribunals*.
- Ministry of Justice (2014). *Independent Review of Quality Arrangements under the MoJ Language Services Framework Agreement*.
- Ministry of Justice/thebigword (2019). *Minimum Requirements for Face-to-Face Interpreting*.
- National Agreement on arrangements for the use of interpreters, translators and language services professional in investigations and proceedings within the Criminal Justice System (1997, updated 2007)*
- National Audit Office (2012). *The Ministry of Justice's Language Services Contract*.
- National Police Chiefs' Council (2020). *PAIT – Police-Approved Interpreter and Translator Scheme*
- NRPSI (2020). *Qualifications and Experience Requirements for Entry onto the National Register of Public Service Interpreters*.
- The Nuffield Foundation (1993). *Access to Justice – A report*.
- Ofqual (2021). *Annual Qualifications Market Report: 2019 to 2020 academic year*.
- Ofqual analytics (2022). Number of vocational/professional certificates awarded: interpreting sector 2013-2022 (search and retrieval data).

# Review of Qualifications and Experience Requirements for Spoken Language Interpreting

## APPENDICES

### APPENDIX A – REGULATED QUALIFICATIONS FRAMEWORK (RQF) / EUROPEAN QUALIFICATIONS FRAMEWORK (EQF)

Level	Qualification
8	Doctorate e.g. PhD or Dphil
7	Master's Degree e.g. MA, MSc
6	Degree with Honours e.g. BA, BSc   Degree without Honours Degree Apprenticeship   Level 6 NVQ
5	Foundation Degree   Diploma of Higher Education (DipHE) Higher National Diploma (HND)   Level 5 NVQ
4	Higher National Certificate (HNC)   Higher Apprenticeship Certificate of Higher Education (CertHE)   Level 4 NVQ
3	A level - Grades A, B, C, D or E   AS levels   Cambridge Pre-U Advanced Apprenticeship   International Baccalaureate Diploma Extended Project Qualification EPQ   Cambridge Techs City & Guilds Advanced Technical Certificates   Level 3 NVQ Music Grades 6, 7 and 8
2	GCSE & iGCSE - Grades A*, A, B or C or new grades 9, 8, 7, 6, 5 & 4 Intermediate Apprenticeship   International Baccalaureate - MYP Welsh & Scottish Baccalaureates   Higher Project Qualification HPQ City & Guilds Advanced Technical & OCR Cambridge Nationals BTEC Firsts   Level 2 NVQ   Music Grades 4 and 5
1	GCSE - Grades D, E, F or G or new grades 3, 2 & 1 Music Grades 1, 2 and 3

Table 1 shows the correspondence of levels established between national qualifications frameworks and the EQF:

European Qualifications Framework (EQF)	Regulated Qualifications Framework England/ Northern Ireland (RQF)	Credit and Qualifications Framework for Wales (CQFW)	Scottish Credit and Qualifications Framework (SCQF)	The National Framework of Qualifications for Ireland (NFQ IE)
8	8	8	12	10
7	7	7	11	9
6	6	6	10/9	8/7
5	5/4	5/4	8/7	6
4	3	3	6	5
3	2	2	5	4
2	1	1	4	3
1	E3	E3	3	2/1
	E2	E2	2	
	E1	E1	1	

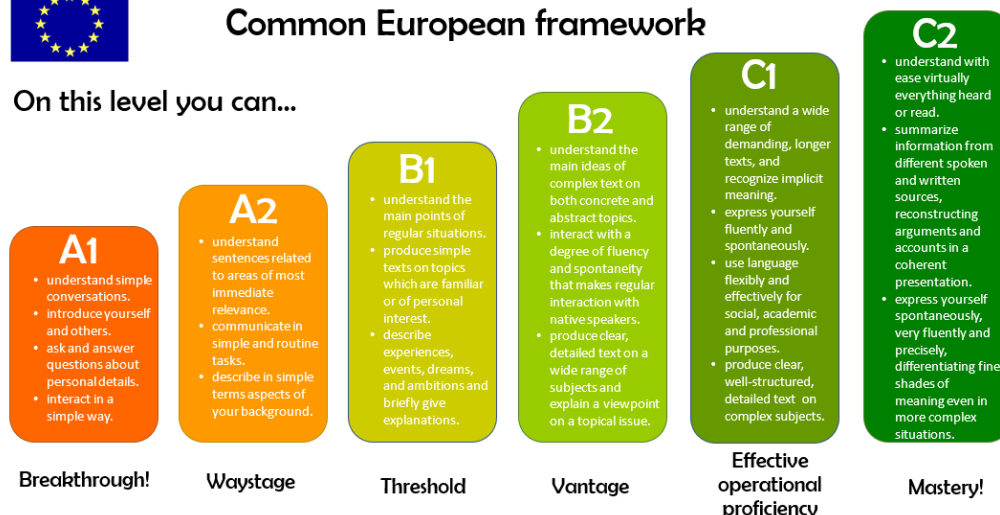


## APPENDIX B – COMMON EUROPEAN FRAMEWORK OF REFERENCE FOR LANGUAGES (CEFR)



### Common European framework

On this level you can...



CEFR	ACTFL	
	RECEPTIVE	PRODUCTIVE
<p><b>C2</b></p> <p>Can understand with ease virtually everything heard or read. Can summarize information from different spoken and written sources, reconstructing arguments and accounts in a coherent presentation. Can express him/herself spontaneously, very fluently and precisely, differentiating finer shades of meaning even in more complex situations.</p>	Distinguished	Superior
<p><b>C1</b></p> <p>Can understand a wide range of demanding, longer texts, and recognize implicit meaning. Can express him/herself fluently and spontaneously without much obvious searching for expressions. Can use language flexibly and effectively for social, academic and professional purposes. Can produce clear, well-structured, detailed text on complex subjects, showing controlled use of organizational patterns, connectors and cohesive devices.</p>	Advanced High/ Superior	Advanced High
<p><b>B2</b></p> <p>Can understand the main ideas of complex text on both concrete and abstract topics, including technical discussions in his/her field of specialization. Can interact with a degree of fluency and spontaneity that makes regular interaction with native speakers quite possible without strain for either party. Can produce clear, detailed text on a wide range of subjects and explain a viewpoint on a topical issue giving the advantages and disadvantages of various options.</p>	Advanced Mid	Advanced Low/ Advanced Mid
<p><b>B1</b></p> <p>Can understand the main points of clear standard input on familiar matters regularly encountered in work, school, leisure, etc. Can deal with most situations likely to arise whilst travelling in an area where the language is spoken. Can produce simple connected text on topics which are familiar or of personal interest. Can describe experiences and events, dreams, hopes and ambitions and briefly give reasons and explanations for opinions and plans.</p>	Intermediate High/ Advanced Low	Intermediate Mid/ Intermediate High
<p><b>A2</b></p> <p>Can understand sentences and frequently used expressions related to areas of most immediate relevance (e.g. very basic personal and family information, shopping, local geography, employment). Can communicate in simple and routine tasks requiring a simple and direct exchange of information on familiar and routine matters. Can describe in simple terms aspects of his/her background, immediate environment and matters in areas of immediate need.</p>	Intermediate Mid	Intermediate Low
<p><b>A1</b></p> <p>Can understand and use familiar everyday expressions and very basic phrases aimed at the satisfaction of needs of a concrete type. Can introduce him/herself and others and can ask and answer questions about personal details such as where he/she lives, people he/she knows and things he/she has. Can interact in a simple way provided the other person talks slowly and clearly and is prepared to help.</p>	Novice High/ Intermediate Low	Novice High
0	Novice Low/ Novice Mid	Novice Low/ Novice Mid

## Review of Qualifications and Experience Requirements for Spoken Language Interpreting

### APPENDIX C – COMPARISON OF NATIONAL/INTERNATIONAL FRAMEWORK LEVELS (INCLUDING ENGLISH)

#### Equivalences of Standards used in UK

UK Qualification	CEFR	UK RQF Level	NATO/STANAG 6001
Degree	B2+/C1 (depending on degree content)	Level 5/6	Level 3 to 4
Masters	C1/C2 (depending on focus/modality writing/speaking etc)	Level 7	Level 4 to 5

#### Equivalences of Standards and English Language Frameworks

CEFR	IELTS	ESOL (Ofqual)	TOEFL	CAMBRIDGE ENGLISH <sup>8</sup>	UN NATO STANAG 6001
B1	5	Entry (3)	45-59	Preliminary (B1 Preliminary)	2
B2	6	Level 1	60-93	First Certificate (B2 First)	3
C1	7+	Level 2	94-114	Advanced (C1 Advanced)	3+/4
C2	9	Level 3	115-120	Proficiency (C2 Proficiency)	4/5

From CIOL's Working Level Framework, available in full here

<https://www.ciol.org.uk/sites/default/files/CIOL%20Working%20Level%20Language%20Framework.pdf>

See also CIOL's Professional Level Language Framework:

<https://www.ciol.org.uk/sites/default/files/CIOL%20Professional%20Level%20Language%20Framework.pdf>

<sup>8</sup> Added by author for comparative purposes. Newly revised Cambridge qualification titles in brackets.

## APPENDIX D – NATIONAL OCCUPATIONAL STANDARDS FOR INTERPRETING (OVERVIEW)

### Assess your ability to undertake interpreting assignments (CFAINT01)

This standard is about assessing your ability to undertake interpreting assignments. This involves establishing the nature of the interpreting assignment, the scope of the assignment, the degree of complexity and any health and safety considerations, for example, physical, emotional and personal safety. It also includes assessing your availability and your level of skills and competence to professionally deliver the assignment in line with ethical considerations and relevant codes of conduct. This standard is for all interpreters who undertake interpreting assignments.

### Prepare for interpreting assignments (CFAINT02)

This standard is about preparing for interpreting assignments. This involves using a range of information sources to prepare for interpreting assignments (for example, internet, leaflets, video, glossaries and technical journals), planning appropriately and organising interpreting activities to create the best conditions for effective interpreting including planning any health and safety considerations (for example, physical, emotional and personal safety). It also includes the need to be fully aware of the role of the professional interpreter, the principles of professional practice, relevant codes of conduct and any relevant legal requirements. This standard is for all interpreters who undertake interpreting assignments.

### Interpret one-way as a professional interpreter (CFAINT03)

This standard is for interpreters who carry out one-way interpreting assignments. This involves being able to interpret accurately, one-way, in the target language. It includes being able to select and use the appropriate mode of interpreting for the occasion (i.e. consecutive or simultaneous/whispered) and being able to use technology and equipment effectively and safely, for example microphones, telephones, video technology, video link, interpreting booth and mobile interpreting equipment, as appropriate. It also includes monitoring the effectiveness of the interpreting and addressing any problems and issues that may arise.

### Interpret two-way as a professional interpreter (CFAINT04)

This standard is for interpreters who carry out two-way interpreting assignments. This involves being able to interpret interactions between two or more language participants. It includes being able to select and use the appropriate mode of interpreting for the occasion (i.e. consecutive or simultaneous/whispered) and interpreting accurately, the meaning intended by participants, who are communicating with each other between two languages. It also includes being able to use technology and equipment effectively and safely, for example, microphone, video link and telephone, as appropriate, monitoring the effectiveness of the interpreting and addressing any problems and issues that may arise.

### Evaluate and develop your professional practice as an interpreter (CFAINT05)

This standard is about evaluating and developing your professional practice as an interpreter. This is expressed in two elements: • Evaluate professional practice as an interpreter • Plan and implement continuous professional development (CPD) This involves reflecting on and evaluating your preparation, planning, delivery and management of interpreting assignments including reflecting on your professional practice and behaviour as an interpreter. It includes being able to identify the current and future requirements of your role and professional practice as an interpreter, identifying any gaps in your knowledge and skills and making use of feedback, support and advice from others, for example, participants, colleagues, mentors, peers, supervisors, line managers and professionals who work in the specific domain, where relevant. It also includes being able to plan and implement continuous professional development by creating a professional development plan to develop your professional practice, knowledge and skills. NRPSI Registrants might want to review this standard to provide an overall structure to their CPD practice.

## Review of Qualifications and Experience Requirements for Spoken Language Interpreting

### Produce sight translations within interpreting assignments (CFAINT06)

This standard is for interpreters who produce sight translations of written/video texts from the source language into the target language as part of interpreting assignments. The interpreter may be required to do this within the context of an interpreting assignment, when there is a text, the content of which needs to be translated at sight. This involves being able to assess whether a sight translation can be undertaken within a reasonable time during the interpreting assignment and producing a sight translation of the text, conveying its meaning accurately and fluently. Text can include correspondence, personal status certificates, information leaflets, administrative forms, video clips and text messages.

### Produce immediate translations within interpreting assignments (CFAINT07)

This standard is for interpreters who produce immediate translations of written or signed texts (for example, police witness statements, voicemail, emails, text/video messages, signed complaints) into written form, within interpreting assignments. This involves assessing whether an immediate translation of the text, as part of the interpreting assignment, is appropriate and can be produced considering the restrictions of time, the purpose of the immediate translation and any requirements for additional preparation and research. This also includes being able to produce an immediate translation that accurately reflects the overall meaning and function of the source text in the target language, within the timescales agreed, as part of the interpreting assignment.

### Work with other interpreters (CFAINT08)

This standard is about working with other professional interpreters (including relay interpreting). This involves carrying out any necessary preparation with colleague interpreters for interpreting assignments and negotiating and agreeing with colleague interpreters how the assignment will be conducted in the most effective way. This includes working effectively with other interpreters and supporting colleague interpreters, where necessary. It also includes evaluating the effectiveness of the assignment with colleague interpreters. This standard is for interpreters who work with other professional interpreters in joint/team interpreting assignments, including co-workers.

### Undertake remote interpreting assignments (CFAINT09)

This new standard is for interpreters who undertake remote interpreting assignments using technology and equipment. Remote interpreting is where the interpreter and/or one or more of the participants are in different locations. Examples include interpreting via telephone and/or video conferencing and/or other remote systems. This involves setting up and preparing for remote interpreting assignments, interpreting in a manner appropriate to the technology and equipment being used and evaluating the delivery of remote interpreting assignments, seeking participant's feedback, where relevant.

## APPENDIX E – ISO INTERPRETER REQUIREMENTS

### BS-ISO 20228-19 LEGAL INTERPRETING (SECTION 5 ONLY)

#### 5 Competences and qualifications of legal interpreters

##### 5.1 General

Legal interpreters shall have competences based on domain expertise, professional practice and qualifications abiding by a code of professional ethics and observing one or several protocols. NOTE For examples of codes of professional ethics see e.g. EULITA (European Legal Interpreters and Translators Association) website (<https://eulita.eu/wp/>). Legal interpreters shall also demonstrate a commitment to life-long learning in the pursuit of updating their knowledge and the skills critical to effective linguistic decision-making and interpreting within legal settings. Legal interpreters shall have comprehensive knowledge of the structure of the legal system(s) and administration of justice in the countries where their source and target languages are used. They shall have an understanding of the relevant fields of law (substantive, procedural, criminal, civil, administrative, etc.). They shall demonstrate a thorough understanding of the roles of lawyers, judges, judicial officers, prosecutors, and interpreters. Judicial and other authorities as well as clients in general are encouraged to provide legal interpreters access to case-related and other reference materials in order to enable them to prepare for the interpreting service.

##### 5.2 Domain competences related to legal interpreting

Legal interpreters shall have the ability to convey a message from the source language into the target language (whether spoken languages or sign languages) in an interpreting mode appropriate for a given legal setting. They shall accurately, faithfully, and impartially interpret the substance of all statements without any additions, omissions, or other misleading factors that could alter the intended meaning of the speaker's message. Legal interpreters shall maintain confidentiality of the information that they are party to during assignments unless disclosure is required by law or by a court order. Legal interpreters shall demonstrate mastery of the various interpreting techniques (modes) and the appropriate supportive strategies. Such mastery involves consecutive, simultaneous, and whispered simultaneous interpreting as well as relay interpreting along with sight translation and the support techniques such as memory skills, note-taking, and stress management. Their competences required for interpreting in legal settings shall also include: a) full understanding and mastery of the legal systems involved in the interpreted communicative event, b) high language proficiency in the working languages to the level of legal discourse, c) ability to accurately and idiomatically turn the message from the source language into the target language, d) ability to make quick linguistic decisions regarding word choice or terminology and register selection, e) awareness that linguistic, stylistic and vocabulary choices convey information about the client's socio-economic, educational and cultural background, f) ability to conserve para-linguistic features (non-verbal features) of the original speech such as hesitations, false starts and repetitions, g) ability to excel consistently at interpreting in the mode required by the setting and to provide accurate renditions of informal, formal, and highly formal discourse.

##### 5.3 Linguistic competences

## Review of Qualifications and Experience Requirements for Spoken Language Interpreting

For their working languages, legal interpreters shall have linguistic competences based on accepted standards of language proficiency. Language proficiency shall include speaking, listening comprehension, and reading comprehension skills (i.e. to be able to comprehend various regional accents and/or dialectal differences, recognize various language registers, including formal and informal, be familiar with subject-specific vocabulary, idiomatic expressions, colloquialisms, and slang). They shall have an ability to move easily between formal and informal speech levels and to interpret accurately for speakers with different educational backgrounds. NOTE For further information about linguistic competences for interpreting services refer to ISO 18841. Signed language interpreters shall also have skills to receive and produce signed messages.

### 5.4 Interpreting competences

Legal interpreters shall have acquired and be able to demonstrate mastery of the various interpreting techniques (modes) and the appropriate supportive strategies. Such mastery involves consecutive, simultaneous, and chuchotage (whispered interpreting) as well as relay interpreting along with sight translation and the support techniques such as memory skills, note-taking, and stress management. The interpreting competences shall also include: a) mastery of the role of the legal interpreter (introduction, positioning, turn-taking, when and how to ask for clarification, as appropriate), b) ability to work in various legal settings, situations, or conditions, command of legal terminology and its functional equivalents in the working languages, c) ability to achieve the same effect as the source language utterance in the target language interpretation, d) awareness of investigative techniques in police settings, including rapport building strategies, and ability to accurately portray such strategies into the target language, e) understanding of the discourse of the courtroom, including the strategic use of questions and ability to accurately portray such strategies into the target language, ability to communicate in spoken or sign language and express ideas well, f) ability to self-monitor and self-correct, g) ability to provide appropriate delivery, h) profound awareness, integration, and application of the highest standards of professional conduct and ethics, i) awareness and observance of the applicable code of professional ethics and the best-practice standards governing a specific legal setting (protocol).

### 5.5 Intercultural competences

Legal interpreters shall be aware of and conversant with cultural differences and render them in their linguistic output, gestures and tone. Whenever necessary, legal interpreters shall bridge the cultural and conceptual gaps separating the participants.

### 5.6 Interpersonal competences

Legal interpreters shall have strongly founded communication and interpersonal skills because they must often contend with the great cultural and linguistic diversity of people, often in stressful circumstances, and in difficult settings. They shall be able to build rapport and to exhibit self-control and impartial behaviour in all legal settings. Legal interpreters shall have the ability to move easily between formal and informal speech levels and to interpret accurately for speakers with different educational backgrounds. Legal interpreters shall disclose any real or perceived conflict of interest and shall refrain from accepting gifts, gratuities, etc. Legal interpreters shall maintain confidentiality of the information that they are party to during assignments unless disclosure is required by law or by a court order.

## Review of Qualifications and Experience Requirements for Spoken Language Interpreting

### 5.7 Technical competences

Legal interpreters shall demonstrate the ability to use interpreting equipment (such as microphone, audio- and video-conferencing technology) that can be required for interpreting in a given legal setting (e.g. volume control, microphone etiquette). NOTE In most situations, technical staff is available to support the use of interpreting equipment.

### 5.8 Evidence of legal interpreting qualifications

Legal interpreters shall keep on file and produce on request evidence that attests to their qualifications: a) a recognized degree in legal interpreting from an institution of higher education; or b) a degree in interpreting, linguistics, or language studies which includes significant interpreting training from an institution of higher education; or c) a recognized degree in any other field from an institution of post-secondary education and a state examination in interpreting, or in languages plus proof of their interpreting competence; or d) an official authorization/diploma in legal interpreting. If in exceptional circumstances the requirement for qualifications listed under a), b), c) or d) cannot be met, for example for languages for which no or only a few qualified interpreters are available to provide interpreting services, interpreters shall keep on file and produce on request documentation providing evidence of recent interpreting experience in the language and of continuing professional development. NOTE Evidence of interpreting qualifications is documented in some countries by at least 2 years of interpreting or a minimum of 800 hours of interpreting.

### 5.9 Continuing training/education

Legal interpreters shall maintain and expand their qualifications and be able to provide documentation of any relevant training courses or seminars attended.

### 5.10 Authorization as legal interpreter

Legal interpreters requiring authorization shall keep on file and produce on request evidence of their authorization as legal interpreters, confirming the interpreter's right to provide legal interpreting services. Authorization can be granted by e.g. government, an inter-governmental or international organization, or a non-profit professional body. [NOTE 1 In some countries, the authorization as legal interpreter implies that they provide both interpreting (spoken) services as well as translation (written) services. In other countries a separate authorization is granted to legal interpreters and legal translators, although one person can obtain both authorizations.] [NOTE 2 When no authorized legal interpreters are available, especially for languages for which there are no or only a few qualified interpreters, the justice administration or a judge can appoint a person who can demonstrate his/her knowledge of the two languages involved. This appointment is used in exceptional circumstances when no other alternative is available.]

### BS-ISO-13611-2014 INTERPRETING – GUIDELINES FOR COMMUNITY INTERPRETING (SECTION 4 ONLY)

#### 4 Community interpreter's competences and qualifications

##### 4.1 General

Community interpreters should have the competence to understand and convey a message from the source to the target language (spoken or signed) in a manner that puts the non-native speaker who seeks access to a community service on the same footing as a native speaker of the societal language.

##### 4.2 Competences

###### 4.2.1 Competences related to interpreting

Community interpreters should have the ability to convey a message from the source to the target language (be it spoken or signed) in the appropriate interpreting mode. Accurate interpreting requires the ability to assess and comprehend the original message and render it in the target language in a way that preserves the meaning and supports the same communicative function as the original message. Community interpreting ability also requires the knowledge, awareness, and understanding of the community interpreter's own role in the interpreted communicative event, including the ability to limit that role as required, to intervene when necessary, and to support direct communication between people who do not share a common language. A professional community interpreter should be able to do the following: — interpret in consecutive interpreting mode and simultaneous interpreting mode, as appropriate; — sight-translate materials written in both working languages (when applicable); — take notes during the interpreted assignment, if necessary (e.g. consecutive interpreting mode); — monitor his/her own performance; — apply active listening skills; — provide effective delivery skills; — rely on strong memory skills; — identify and convey the appropriate language registers (i.e. formal or informal variety of language used in a particular situation or when communicating with a particular group of people); — anticipate when to intervene during the interaction; — develop effective problem-solving strategies; — develop and practise effective intervention skills, including transparency; — respect/manage professional good practice and role boundaries of all participants in the interpreted communicative events; — improve performance through self-training, attendance of further training courses (which should be documented), and life-long learning; — observe applicable standards of practice and code of ethics in his/her work; — support client autonomy (e.g. refrain from giving advice); — use chuchotage.

###### 4.2.2 Linguistic ability

Community interpreters should demonstrate linguistic ability in their working languages based on accepted standards of language proficiency. This means the community interpreter should be able to understand and produce technical and non-technical language for a variety of speakers and listeners who vary in age, gender, race, ethnicity, and socio-economic status. The community interpreter should exhibit an in-depth knowledge and understanding of the linguistic varieties of his/her working languages (e.g. dialects, regional varieties, idiomatic expressions) and the required range of language registers. In addition, the community interpreter should have knowledge of subject areas and relevant terminology in both languages and display the same ways of speaking/signing in the subject areas in which he/she is working.



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### 4.2.3 Technical skills

Community interpreters should demonstrate the ability to use the equipment (such as tele- and videoconferencing technology) that can be necessary for on-site or remote interpreting, including microphone etiquette (e.g. pressing the mute button when coughing).

### 4.3 Research skills

Community interpreters should demonstrate the ability to efficiently acquire the additional linguistic, terminological, and specialized knowledge necessary to interpret in specialized cases. Research skills also include expertise and experience in the use of research tools (e.g. software), and the ability to develop suitable strategies for the efficient use of the information sources available (e.g. terminology databases, parallel texts).

### 4.4 Interpersonal skills

The community interpreter should: — be polite, respectful, and tactful; — be able to relate well with people; — exhibit strong communication skills; — display cross-cultural competence; — use effective interjection skills when appropriate; — manage and keep up the flow of communication; — exhibit self-control and impartial behaviour in all situations.

### 4.5 Evidence of qualifications

The ISP should verify and be able to provide verification of the interpreter's competence to provide a service conforming to this International Standard by seeking documented evidence of successful completion of a language proficiency test, or other evidence of language proficiency, in the community interpreter's working languages at a level recognized as adequate for interpreting. In addition, the ISP 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.

## Review of Qualifications and Experience Requirements for Spoken Language Interpreting

### APPENDIX F – CIOL’S PROFESSIONAL LANGUAGE FRAMEWORK

#### Qualifications - Summary of Level Equivalences

CIOLQ Professional Qualifications	Reference/Proficiency Levels		Academic/RQF Levels	
	CEFR	NATO/UN	Equivalent Academic Level	RQF Level
CIOLQ DPSI	C1	Level 3+/4	Degree/Masters	Level 6 (5 translation-reading and writing)
CIOLQ DipTrans	C1/C2 (notably writing at C2 in target language)	Level 4+	Masters	Level 7
CIOLQ CertTrans	C1 (notably writing at C1 in target language)	Level 3+/4	Degree/Masters	Level 6

See CIOL’s full Professional Level Language Framework:

<https://www.ciol.org.uk/sites/default/files/CIOL%20Professional%20Level%20Language%20Framework.pdf>

### APPENDIX G - QUALIFICATIONS REQUIREMENTS UNDER CURRENT CONTRACT

#### Complex Written

1.1 To work on a Complex Written Booking for a language other than a 'language permitted exceptional qualification requirements', a Language Professional must have obtained at least one of the qualifications: CCI (IOL), Diploma in public service interpreting (DPSI) (Law), DPI (formerly Metropolitan Police Test) or level 6 diploma in community interpreting (international school of linguists)

1.2 To work on a Complex Written Booking for a 'language permitted exceptional qualification requirements':

1.2.1 the Primary Language of the Language Professional must be the Relevant Language or the Language Professional must have sufficient ability to communicate in the Relevant Language;

1.2.2 the Language Professional must have provided at least one hundred (100) hours of interpretation services in the Relevant Language, which must include some spoken and some written;

1.2.3 the Language Professional must either: (a) have obtained at least one of the following qualifications: BA in English, BA in interpreting, BA in interpreting & translation, BA in linguistics, BA in modern languages, BA in philology, BA in translation, degree in English language, degree in English philology, diploma in English philology, degree in linguistics, DPSI (Health), DPSI (Law) partial, DPSI (local govt.), language related degree where English features as part of the course, language related diploma where English features as part of the course, MA in teaching of English, Masters in interpreting, Masters in interpreting & translation, Masters in linguistics, DPI partial, post graduate diploma in interpreting, post graduate in conference interpreting, language related degree (foreign language), language related diploma (foreign language). or (b) either: (i) have passed the English Proficiency Test; or (ii) the Primary Language of the Language Professional is English; and

1.2.4 the Language Professional must have provided suitable references; and

1.2.5 the Supplier must have obtained the prior consent of the Commissioning Body to the use of the Language Professional for the Booking.

#### 2. Complex Other

2.1 To work on a Complex Other Booking for a language other than a 'language permitted exceptional qualification requirements':

2.1.1 the Language Professional must meet the requirements set out in Paragraph 1.1; or

2.1.2 where the Primary Language of the Language Professional is English: (a) the Language Professional must have obtained at least one of the following qualifications: BA in interpreting, BA in interpreting & translation, BA in linguistics, BA in modern languages, BA in philology, BA in translation, degree in linguistics, DPSI (Health), DPSI (Law) partial, DPSI (local govt.), Masters in interpreting, Masters in interpreting & translation, Masters in linguistics, DPI partial, post graduate diploma in interpreting, post graduate in conference interpreting, language related degree (foreign language), language related diploma (foreign language). The qualification must have featured the

## Review of Qualifications and Experience Requirements for Spoken Language Interpreting

Relevant Language as part of the course; and (b) the Language Professional must have provided at least one hundred (100) hours of interpretation services in the Relevant Language; or

2.1.3 where the Primary Language of the Language Professional is a language other than English: (a) the Language Professional must have obtained at least one of the following qualifications: BA in English, BA in interpreting, BA in interpreting & translation, BA in linguistics, BA in modern languages, BA in philology, BA in translation, degree in English language, degree in English philology, diploma in English philology, degree in linguistics, DPSI (Health), DPSI (Law) partial, DPSI (local govt.), language related degree where English features as part of the course, language related diploma where English features as part of the course, MA in teaching of English, Masters in interpreting, Masters in interpreting & translation, Masters in linguistics, DPI partial, post graduate diploma in interpreting, post graduate in conference interpreting,), either: (i) in the United Kingdom; or (ii) where the qualification was obtained outside of the United Kingdom, the qualification must have featured English as part of the course; and (b) the Language Professional must have provided at least one hundred (100) hours of interpretation services in the Relevant Language.

2.2 To work on a Complex Other Booking for a 'language permitted exceptional qualification requirements':

2.2.1 the Language Professional must meet the requirements of Paragraph 1.2; or

2.2.2 the Primary Language of the Language Professional must be the Relevant Language or the Language Professional must have sufficient ability to communicate in the Relevant Language and either: (a) the Language Professional must have provided at least fifty (50) hours of interpretation services in the Relevant Language; or (b) the Language Professional must either: (i) have obtained at least one of the following qualifications: BA in English, BA in interpreting, BA in interpreting & translation, BA in linguistics, BA in modern languages, BA in philology, BA in translation, degree in English language, degree in English philology, diploma in English philology, degree in linguistics, DPSI (Health), DPSI (Law) partial, DPSI (local govt.), language related degree where English features as part of the course, language related diploma where English features as part of the course, MA in teaching of English, Masters in interpreting, Masters in interpreting & translation, Masters in linguistics, DPI partial, post graduate diploma in interpreting, post graduate in conference interpreting, language related degree (foreign language), language related diploma (foreign language).; or (ii) either: (1) have passed the English Proficiency Test; or (2) the Primary Language of the Language Professional is English; and (c) the Language Professional must have provided suitable references.

### 3. Standard

3.1 To work on a Standard Booking for a language other than a 'language permitted exceptional qualification requirements':

3.1.1 the Language Professional must meet the requirements of Paragraphs 2.1.1, 2.1.2, 2.1.3; or

3.1.2 where the Primary Language of the Language Professional is English, either: (a) the Language Professional must have obtained at least one of the following qualifications: AIT (formerly IAA), basic interpreting qualification, community interpreting (level 2,3 or 4), DPI (formerly Metropolitan Police test) unit pass, DPSI (health) partial, DPSI (law) unit pass, DPSI (local govt.) partial, IND (home office), UK border agency certificate, language related degree, language related diploma; or (b) the

## Review of Qualifications and Experience Requirements for Spoken Language Interpreting

Language Professional must; (i) be enrolled on a course or have partially completed a course for at least one of the following qualifications: AIT (formerly IAA), basic 18 interpreting qualification, community interpreting (level 2,3 or 4), DPI (formerly Metropolitan Police test) unit pass, DPSI (health) partial, DPSI (law) unit pass, DPSI (local govt.) partial, IND (home office), UK border agency certificate, language related degree, language related diploma; (ii) have completed all required modules for the relevant qualification as shall be notified by the Authority to the Supplier prior to the Services Commencement Date; (iii) have provided at least one hundred (100) hours of interpretation services in the Relevant Language; and (iv) have provided suitable references; or

3.1.3 where the Primary Language of the Language Professional is a language other than English: (a) the Relevant Language must be the Primary Language of the Language Professional or the Language Professional must have sufficient ability to communicate in the Relevant Language; and (b) either: (i) the Language Professional must have obtained at least one of the following qualifications: AIT (formerly IAA), basic interpreting qualification, community interpreting (level 2,3 or 4), DPI (formerly Metropolitan Police test) unit pass, DPSI (health) partial, DPSI (law) unit pass, DPSI (local govt.) partial, IND (home office), UK border agency certificate, language related degree, language related diploma, either: (A) in the United Kingdom; or (B) where outside the United Kingdom, English must have featured as part of the course; or (ii) the Language Professional must: (A) be enrolled on a course or have partially completed a course for at least one of the following qualifications: AIT (formerly IAA), basic interpreting qualification, community interpreting (level 2,3 or 4), DPI (formerly Metropolitan Police test) unit pass, DPSI (health) partial, DPSI (law) unit pass, DPSI (local govt.) partial, IND (home office), UK border agency certificate, language related degree, language related diploma, either: (1) in the United Kingdom; or (2) where outside the United Kingdom, English must feature as part of the course; (B) have completed all required modules for the relevant qualification as shall be notified by the Authority to the Supplier prior to the Services Commencement Date; 19 (C) have provided at least one hundred (100) hours of interpretation services in the Relevant Language; and (D) have provided suitable references.

3.1.4 To work on a Standard Booking for a 'language permitted exceptional qualification requirements': (a) the Language Professional must meet the requirements of Paragraphs 2.2.1 or 2.2.2; or (b) the Primary Language of the Language Professional must be the Relevant Language or the Language Professional must have sufficient ability to communicate in the Relevant Language and either; (i) the Language Professional must have experience of providing interpretation services in the Relevant Language; or (ii) the Language Professional must either: (A) have obtained at least one of the following qualifications: BA in English, BA in interpreting, BA in interpreting & translation, BA in linguistics, BA in modern languages, BA in philology, BA in translation, degree in English language, degree in English philology, diploma in English philology, degree in linguistics, DPSI (Health), DPSI (Law) partial, DPSI (local govt.), language related degree where English features as part of the course, language related diploma where English features as part of the course, MA in teaching of English, Masters in interpreting, Masters in interpreting & translation, Masters in linguistics, DPI partial, post graduate diploma in interpreting, post graduate in conference interpreting, language related degree (foreign language), language related diploma (foreign language); or (B) either: (1) have passed the English Proficiency Test; or (2) the Primary Language of the Language Professional is English; and (c) the Language Professional must have provided suitable references

## APPENDIX H – CURRENT CORE AND RARE LANGUAGE LISTS

### Core/standard Languages (41)

Albanian (all variants), Arabic (all variants), Armenian, Bengali, Bulgarian, Cantonese, Croatian, Czech, Dari (all variant), Dutch, Estonian, Farsi, French (all variants), German (all variants), Greek, Gujarati, Hindi, Hungarian, Italian, Japanese, Kurdish (Sorani), Latvian, Lithuanian, Mandarin, Pashto (all variants), Polish, Portuguese, Punjabi (all variants), Romanian, Russian, Serbian, Slovak, Slovene, Somali, Spanish, Tamil, Thai, Turkish, Ukrainian, Urdu and Vietnamese.

### Rare/Languages permitted exceptional qualification requirements (languages without DPSI) (152)

Acholi, Afar, Afrikaans, Akan, Amharic, Amoy, Anaang, Ashanti, Assyrian, Azerbaijani/Azeri, Babani, Balochi, Bamanankan, Bambara, Bantu, Barawe, Basque, Belarusian, Bemba, Berber, Bilen, Bisaya, Bosnian, Bravanese, Burmese, Catalan, Chaldean – Neo Aramaic, Chechen, Chinese (all variants), Chichewa, Creole (all variants), Cypriot, Daju, Danish, Dholuo, Dioula, Dzongkha, Edo, English, English (Pidgin), Eritres Ewe, Ewe (Togo), Filipino (all variants), Finnish, Fijian, Flemish, Fula, Fur, Ga, Gaelic (Irish), Gaelic (Scottish), Georgian, Gusii, Gorani, Hakka, Hausa, Hebrew, Hindko, Igbo, Ilocano, Indonesian, Ishan, Jula, Kachchi, Kannada, Kashmiri, Kazakh, Khmer, Kibajuni, Kikongo, Kikuyu, Kinyamulenge, Kinyarwanda, Kirundi, Konkani, Korean, Krio, Kurdish, Kyrgyz, Lak, Lao, Latin, Lango, Lingala, Luba-Kasai, Luganda, Macedonian, Makaton, Malagasy, Malay, Malayalam, Malaysian, Maltese, Mandinka, Maninka, Marathi, Minangkabau, Mirpuri, Mongolian, Montenegrin, Mooré, Ndebele, Nepalese, Norwegian, Nzema, Oromo (Central), Oshiwambo, Otjiherero, Pahari, Papiamentu, Patois (Jamaica), Pokomchi, Potwari, Quechua, Roma, Rohingya, Runyankole, Saho, Shina, Shona, Sindhi, Sinhala, Soninke, Sudanese, Susu, Swahili, Swedish, Sylheti, Tagalog, Taiwanese, Tajik, Tama, Telugu, Tetun, Tibetan, Tigre, Tigrinya, Tswana, Turkmen, Twi, Urhobo, Uyghur, Uzbek (Northern), Venda, Welsh (interpreted in England or Scotland only), Wolof, Xhosa, Yiddish, Yoruba, Zaghawa, Zarma-Songhay and Zulu.

### Special Services (7) Out of scope of this report

British sign language, Deaf relay, Electronic notetaker, Lipspeaker, Sign supported English, Speech-to-Text Reporter, Video remote interpreting.

## Review of Qualifications and Experience Requirements for Spoken Language Interpreting

### APPENDIX I - TABLE OF REGULATED VOCATIONAL/PROFESSIONAL INTERPRETING QUALIFICATIONS

Qualification Name	Level	TQT* Hrs	Regulator	Description	Suppliers	Observations
Award/Certificate in Preparing for Community Interpreting	2	60-130	OFQUAL	Purpose: to preparing for the Community Interpreting Role. Aims to develop: public service awareness, language skills in preparation for interpreting, listening and assertiveness skills, volunteering experience.	Ascentis GA (Gatehouse Awards) SEG (Skills & Education Group Awards)	<u>No</u> interpreting training or testing From Ascentis specification: “this is not a training course to become an interpreter”.
Certificate in Community Interpreting	3	160	OFQUAL	Purpose: to equip learners with language skills to undertake basic interpreting work. Aims to develop: knowledge of role, practical interpreting skills at levels 3 & 4, specialist skills.	Ascentis GA TQUK <sup>9</sup>	Specialisms <u>do not</u> include legal work. TQUK has an operational end date for this qualification of May 2022.
Certificate in Community Interpreting	4	120	OFQUAL	Purpose: to develop skills required to be a community interpreter. Aims to develop: research skills to prepare for assignments, interpreting and sector-specific terminology, understanding of different assignment types and procedures, cultural difference and their impact.	OCN NI TQUK	OCN only available in Ireland. Includes ‘criminal justice and probation’ as one of 4 options for study. TQUK has an operational end date for this qualification of May 2022.
Diploma in Community Interpreting	6	400	OFQUAL	Purpose: to qualify experienced interpreters for work in complex settings. Aims to: develop expertise in specific community and public service settings.	TQUK	TQUK has an operational end date for this qualification of May 2022.
Diploma in Public Service Interpreting (DPSI)	6	440-450	OFQUAL	Purpose: to qualify experienced interpreters for work in public services settings. Aims to: provide career development in a work context; give confidence to users of public services whose first language is not English; complement other vocational or professional training; qualify interpreters to register for work at professional level.	CIOL TQUK	TQUK has an operational end date for this qualification of May 2022.
Diploma in Police Interpreting (DPI)	6	440	OFQUAL	Purpose: to set a consistent standard in police interpreting. Aims: to provide evidence of specialist skills and reassurance to users and providers of police services.	CIOL	Operational end date for this qualification of August 2022.

\* Total Qualification Time

<sup>9</sup> Since this report was completed in June 2022, TQUK’s portfolio of interpreting qualifications has been transferred to iCQ (icanqualify).