



INT PROJECT DISCUSSION PAPER

November 2013

This paper reports on progress with the Improvements to NAATI Testing Project (INT Project) and current plans for the start of INT Phase 2 for consultation with stakeholders. It describes the outcomes from the INT consultations undertaken so far at Attachment A, articulates principles which will guide improvements to the national certification scheme at B and describes a proposed Model for the scheme at C. Responses to the 17 recommendations in the INT Report are at D.

Subject to agreement with the governments of Australia which are the Members of NAATI, the proposed Model builds on what NAATI has now, proposes to implement most of the recommendations from the independent report *Development of a conceptual overview for a new model for NAATI standards, testing and assessment* (INT Report) and adds a new credential primarily to meet the needs of Indigenous and humanitarian/refugee language communities. NAATI emphasises this Model and draft implementation plans are work in progress and subject to further development.

The proposed improvements in the national certification system for translators and interpreters described in this Paper are what NAATI believes are feasible now. The proposals are informed by expert advice from the INT Report and feedback from Phase 1 consultations with NAATI's Members and with stakeholders. Limited resources mean NAATI will not be able to adopt all advice and all feedback now. NAATI proposes changes which can be achieved now within the resources it believes are likely to be available at this time.

BACKGROUND

As initially conceived by NAATI's Board the INT project has three phases of development:

1. **Phase 1:** Development of a conceptual overview of the elements of a new model for NAATI standards, testing and assessment that is able to deliver the objectives for the project.
2. **Phase 2:** Submission of a proposal to develop the proposed conceptual framework from Phase 1 into a workable practical application for NAATI's testing.
3. **Phase 3:** Implementation of a proposal accepted from Phase 2 to deliver a practical application of a new approach to testing as agreed with NAATI.

This paper uses terminology which might be new to some readers. The term *accreditation* is now only used in Australia, New Zealand and South Africa to describe what NAATI does, namely awards credentials to or certifies translators and interpreters. It was used 35 years ago when NAATI was created but now internationally the term refers to high-level authorities accrediting organisations. In International Standards Organization (ISO) terms NAATI would be an accredited body.

The terms *certification* or *credentialing* are used in ISO standards to describe accredited organisations certifying that individuals meet the requirements of a certification scheme and awarding them credentials. In ISO terminology NAATI would be accredited to certify people as translators and interpreters and to award them credentials to confirm that status.

The term *qualification* is often used to mean either a formal Australian Qualifications Framework (AQF) qualification or shorter training courses – this is how it is used in the INT Report. In NAATI usage *education* refers to specialised courses, leading to an AQF qualification, provided by tertiary institutions to prepare graduates for professional life while *training* is used to describe vocational training courses which are often undertaken after graduation throughout practitioners' careers often as Continuing Professional Development (CPD).

INT Report

The INT Report was produced by an independent research team led by Prof Sandra Hale of University of New South Wales and was delivered in November 2012. It was published in December 2012 on the NAATI website.

The INT Report acknowledged NAATI's role in establishing translating and interpreting as a profession in Australia, NAATI's status as an international leader in certification of community interpreting and translating in multiple language combinations and NAATI's important relationship with interpreting and translating education and training. Comparing NAATI with international certification bodies it found NAATI had two important advantages namely its uniformity as a national system and its coverage of many more languages than in other countries.

The INT report recommended improvements in pre-requisites to NAATI testing, validity and reliability of testing instruments, assessment methods and training of examiners. It highlighted the most important improvements needed as being compulsory pre-test education and training and availability of specialist credentials.

PHASE 1 CONSULTATIONS

Following publication of the INT Report there was consultation with NAATI's Members which provide NAATI's base funding and create the policy environment in which it operates. There followed extensive conversations with key stakeholders, practitioners and their representative groups, educators and employers.

Several Members confirmed to NAATI what they had told the INT Report authors at the start of Phase 1, namely that they required improvements at the lowest possible cost and added they also required any changes which might result from INT to not add significant barriers to access to the national certification system. Of particular concern to Members were the interpreting needs of Indigenous and humanitarian/refugee communities.

Between March and May 2013 NAATI conducted 28 consultation meetings or seminars with practitioners, professional groups, educators, employers and departments attended by between 10 to 60 participants. Several hundred people met with NAATI Directors and management in meetings in all capital cities plus Broome. Generally these meetings were positive and constructive. There are five main observations from the Phase 1 INT Consultations, namely the:

- Consultations were generally well received.
- Degree of misunderstanding and misinformation about NAATI and the current scheme is significant.
- Breadth and complexity of translating and interpreting in Australia from international conferences to community levels is not well understood.
- Participants often questioned whether the Model proposed in the INT Report could meet the needs of Indigenous and/or humanitarian and refugee languages.
- Impact on the certification scheme and the profession of the engagement of un-credentialed practitioners is serious.

In summary, almost all stakeholder discussions during the consultations were focused on improving the national scheme apart from some airing of personal complaints and a few criticisms. There were occasional criticisms of INT and of NAATI for undertaking INT - a handful of critics said there was no need for INT as the system was working well as it is and that INT repackaged already known academic research and ignored the needs of the market.

NAATI ROLE

Under the proposed Model NAATI's Mission and Purpose remain as they are now. NAATI's Mission is to:

Set and maintain high national standards in translating and interpreting to enable the existence of a pool of accredited translators and interpreters responsive to the changing needs and demography of the Australian culturally and linguistically diverse society.

NAATI's Annual Reports incorporate that Mission into a broader statement of NAATI's Purpose which is to:

- *strengthen inclusion and participation in Australian society by assisting in meeting the Nation's diverse and changing communications needs and expectations through:*
- *setting, maintaining and promoting high national standards in translating and interpreting, and*
- *implementing a national quality-assurance system for credentialing practitioners who meet those standards.*

NAATI will continue to be the independent authority which certifies Australian translators and interpreters. It will continue to co-operate with the national professional groups responsible for promoting the interests of the profession, with the educators responsible for preparing practitioners to enter the profession and with the governments of Australia which create and administer the policies for delivery of government languages services.

PROPOSED MODEL

The proposed Model seeks to improve the current scheme partly as recommended by the INT Report and partly following feedback in consultations. This Model will go as far as is practical at this time in promoting quality while meeting market requirements and containing costs.

NAATI proposes to introduce a new Specialist level credential initially in health and legal interpreting and translating. This might be available only by completion of new specialists Approved Courses which would probably be subject but not language specific.

The current generalist credentials of Professional and Paraprofessional would be retained but with changes. It is proposed to re-position the generalist levels to encourage articulation upward through in-career training and/or education.

There is a proposed new Provisional entry level credential to be designed to encourage new entrants to the profession to engage with the system. This would be similar to the current Recognition credential and as with Recognition, training would be required in place of testing. The Provisional credential would not be language-specific and might be limited to certain language groups.

The Advanced Translator and Conference Interpreter credentials would disappear in their present form as would the accreditation pathways of overseas qualifications, membership of international associations and advanced standing. NAATI will examine further how a Conference specialisation can be introduced in this Model.

The principles embedded in the current national certification scheme are inherent or assumed but should be stated and public. The principles which have been developed so far for the proposed Model are at Attachment B for discussion with stakeholders.

More work is needed on this Model, but NAATI believes it retains much that is sound in the current scheme while adopting the changes which NAATI judges can be implemented now.

KEY ISSUES

The proposed Model raises several issues for stakeholders to consider.

Comprehensive Scope

As detailed in the attached Principles, the Model would encompass interpreting and translating for multicultural, Indigenous and sign language communities. It would cover diverse settings from interpreting at international conferences, to working on undercover criminal investigations to community meetings in remote settlements as well as probably continue to include bilingual workers.

In the consultations there was strong support from Indigenous and sign language stakeholders for their language groups to remain in the improved national certification scheme. The inclusiveness in the proposed scheme brings with it complexities but NAATI believes these can be met by this Model.

Specialist Credentials

The proposed new Specialist credentials would probably require tertiary qualifications as mandatory pre-requisites.

NAATI proposes to make tertiary qualifications mandatory here because (where they are available) Specialists will tend to be engaged for the most critical professional situations. While in some languages holders of Professional and Paraprofessional credentials will still operate in critical situations it is expected that over time these credentials will be relevant more to community or general interpreting and the justification for mandating tertiary qualifications will be less strong.

The Specialist credentials might be acquired by graduation from Approved Courses or alternately if they were to be available through testing, a Bachelor level or an Advanced Diploma qualification might be a mandatory pre-requisite. Which level and whether the tertiary pre-requisite should be in translating or interpreting or in any discipline are questions about which NAATI wishes to consult stakeholders in Phase 2.

Compulsory Pre-test Training

NAATI has considered the recommendation that pre-test training be made compulsory and cannot commit to adopting this approach at this time. There is more work needed here, in particular in the Job Task Analysis. There are several issues to be explored further.

The national system is voluntary and already significant numbers of practitioners operate outside it without credential or qualification. Whether some basic pre-test training could be introduced without being a disincentive for potential new entrants needs to be considered.

Similarly there is the issue of the balance between training before and after certification testing. Internationally success in the certification test leads to career-long training commitments. The Australian system is evolving similarly with Revalidation. All NAATI credentials issued since 2007 require the holders to undergo CPD to retain those credentials and NAATI proposes that all credentials in the improved system will require revalidation.

NAATI expects that in time the training required to gain the Provisional credential might become a minimum candidates undertake. There are opportunities to be explored before a decision is made here such as whether such training might be offered widely by educational institutions, perhaps as part of a modular suite as proposed in the INT Report.

NAATI will continue to encourage candidates to undergo such training before testing and Revalidation will require it for those who pass tests while it explores further these issues.

Qualifications

NAATI will continue to emphasise the different but complementary roles of credentials and qualifications. Credentials are issued to signify competence or the ability to apply knowledge and skills while qualifications signify demonstrated education and/or training.

NAATI considered making tertiary qualifications in any discipline a mandatory pre-requisite for generalist credentials (Professional or Paraprofessional in the proposed model) but decided to continue with the approach of the current Professional credential where a tertiary qualification in any discipline is one of the current pre-requisites but is not mandatory.

NAATI's preference will continue to be that practitioners who wish to make translating and interpreting their profession prepare for their chosen profession by tertiary education in translating and interpreting but NAATI proposes to stop short of mandating such qualifications for generalist credentials at this time. The limited availability of tertiary training in T&I makes mandating T&I tertiary qualifications as pre-testing pre-requisites a longer term aspiration. To illustrate, since it was created NAATI has awarded credentials in almost 220 language combinations. In 2013 less than 60 of these languages were in the scopes of Approved Courses and only 25 are actually offered.

International Standards

NAATI will seek to align its operations with the relevant International Standards Organization (ISO) standard ISO/IEC 17024 *Conformity assessment – General requirements for bodies operating certification of persons* where practical to do so. It has not yet been decided whether NAATI will apply for formal ISO accreditation or just conform to the extent it thinks sensible. There are costs and benefits which need to be examined. In the meantime NAATI will adopt the ISO terminology which uses accreditation to refer to organisations and certification to refer to awarding credentials to people.

Approved Courses

The INT Report recommends continuation of the current Approved Course system with HE and VET institutions. Once they are approved by NAATI institutions are subject to regular monitoring to ensure compliance and that assessments of students for recommendation to NAATI are conducted in line with NAATI guidelines. It is sometimes claimed Approved Course status boosts student numbers in T&I courses. NAATI proposes to continue to support the T&I education sector through Approved Courses if it can while meeting its own objectives.

The current arrangements between NAATI and Approved Course institutions will require modification if NAATI is to seek accreditation under ISO 17024. This is because the ISO requires certification authorities to maintain control over certification assessments. NAATI will consult with Approved Course institutions on assessment arrangements that will comply with the ISO before it makes a decision to proceed with accreditation under the ISO.

Communications

The INT consultations confirmed that there is much confusion and misinformation about translating and interpreting, the national certification system and NAATI. NAATI will make communications with stakeholders a priority particularly for the next 12 months.

DECISIONS

In July the NAATI Board decided more consultation and research than previously planned is warranted. Where NAATI had hoped to finalise changes to the system this calendar year those decisions will now be made by NAATI and its Members by the end of this financial year i.e. mid-2014.

NAATI now plans to continue implementation planning throughout 2013/14. Work will include:

- further consultations with stakeholders
- analysis of the costs of proposed changes
- design of the Job Task Analysis
- implementation planning and preparations in the first half of 2014.

Assuming the INT changes proceed as presently envisaged 2014/15 would be spent completing analyses and systems design. Then 2015/16 would be spent on system development and testing and the switch over to the new scheme would happen from July 2016.

CONCLUSION

The INT consultations produced much valuable input to the decisions to be made about the national certification system and guided drafting the proposed Model and initial implementation planning. They also created goodwill among key stakeholders and a willingness to continue to co-operate. NAATI proposes to work with Members and stakeholders to develop further this Model with a view to deciding to proceed with implementation by mid-2014.

November 2013

Consultation Outcomes

Consultations well received

NAATI's consultation facilitator Pino Migliorino reports NAATI's initiatives in publishing the INT Report and consulting with stakeholders were well-received in all but one meeting where the reception was mixed. The way in which the consultations were conducted, the number of meetings, the breadth of interests consulted and the involvement of Directors and staff contributed to this positive outcome. Subjecting likely changes to further discussion with stakeholders should help gather further useful intelligence to guide design and system development. The next stage of consultations needs to focus more on detail in meetings with national stakeholders such as educators, employers and professional groups, focus groups and surveys.

Lack of understanding/misinformation

The lack of understanding about T&I and the extent of misinformation about NAATI and the current certification scheme was confirmed by the INT Consultations. Confusion and misinformation is much greater than we expected. Part of the reason for this is that for years NAATI has had to treat communications as marginal to its core business of processing credentials. The lack of a sustained communications effort by NAATI has left much confusion uncorrected.

Breadth & Complexity

Again, NAATI knows there is great variety and complexity in the settings in which NAATI credentialed practitioners operate but the INT Consultations only reinforced that reality. Translators and interpreters are engaged in government-to-government communications, in police investigations, in education, in communicating with just-arrived refugees, in capital city courts and hospitals and tiny outback settlements. The breadth and critical nature of many engagements are not widely understood or appreciated outside the sector.

Humanitarian and Refugee/Indigenous Needs

A concern expressed often in the consultations was that the Model proposed in the INT Report would not meet the particular needs of humanitarian/refugee and/or Indigenous language interpreting. Whether the intentions here of the INT Report authors had been understood correctly or not, there was wide support for some form of entry level credential particularly to encourage new entrants from these language groups.

Engagement of un-certified practitioners

Practitioners were particularly concerned about the increasing numbers of people who are engaged as interpreters but who have no credential and no qualification and usually are not members of professional groups. Whether these people are engaged directly by government departments or indirectly by agencies operating under contract to them the concern was this undermines the national scheme and devalues the credentials and qualifications of practitioners who work within the scheme.

PHASE 2 PRINCIPLES

Role

NAATI will continue to be the national authority which certifies translators and interpreters. It will focus on certification and registration of translators and interpreters but will continue to support efforts by:

- Members developing and applying consistent language services policies and procedures (particularly in procurement of translating and interpreting services) which support the national scheme
- national professional groups promoting the translating and interpreting profession and particularly to seek appropriate remuneration and conditions of employment
- HE and VET educators providing tertiary qualifications and training.

ISO Compliance

NAATI will seek to align its operations with relevant standards, most probably ISO/IEC 17024 *Conformity Assessment – General requirements for bodies operating certification of persons*. Whether NAATI should seek formal accreditation under 17024 or just conform where possible is a decision NAATI will make once the costs and benefits involved have been assessed.

In the meantime NAATI will adopt the language of similar international organisations by referring to certification where NAATI previously used accreditation i.e. certification is the process by which credentials are awarded to people. In international usage accreditation is the process whereby some higher authority accredits certifying bodies i.e. organisations.

Parallel Pathways

NAATI will continue to award credentials on the basis of both tertiary qualifications and testing for most certification levels for reasons of access and equity as well as practicality. Where there are tertiary courses available NAATI will encourage candidates to take that pathway. If candidates who cannot undertake tertiary studies can meet the same assessment standards as NAATI requires in tertiary assessments they will continue to be certified (probably for most levels of credential).

Standards

The standards that presently are inherent in assessments will be published in the new national scheme. Exactly how the standards will be best articulated will be determined in Phase 2. The standards and certifications will be mapped or otherwise related to specific qualifications in the Australian Qualifications Framework.

Training

The improved scheme will be designed to enable entry at the relevant level given qualifications and/or experience and articulation based on training and assessments during a practitioner's career. While the expectation will be that test candidates undergo some form of pre-test training there will be exceptions which will mean pre-test training cannot be called compulsory at this time.

As at present holders of the Paraprofessional credential would be encouraged to seek to upgrade to Professional but that might not be compulsory. Holders of the Provisional level would be required to articulate within a specified time from when training or testing becomes available, possibly three years.

Costs

Costs to practitioners would continue to be kept as low as possible without compromising validity or reliability. Again the cost of training for and acquiring credentials and qualifications was identified as a barrier to entry for community interpreters generally and in humanitarian/refugee and Indigenous language groups specifically.

Credentials and Qualifications

The improved scheme will continue to treat credentials and qualifications as different but complementary. It will reaffirm tertiary translating and interpreting qualifications continue to be integral to the national scheme but because of limited availability now must remain a pathway alongside testing.

An exception where tertiary qualifications might be made mandatory could be the proposed new Specialist certification. Whether such qualifications should be in T&I or any discipline is not yet decided.

Comprehensive

The national certification system will continue to encompass spoken, written and sign communications. NAATI will continue to award credentials to practitioners in multicultural, Indigenous and sign languages.

There will probably be a distinction between credentials which are certified and those which are not on the basis of those which have skills assessed or tested components. The certifications will include the specialist and two generalist levels but might not include the proposed new Provisional entry level certification shown in Attachment C and would not include the Language Aide (or what replaces it).

International

NAATI will continue to cooperate with international T&I certification organisations in the development of harmonised policies and systems.

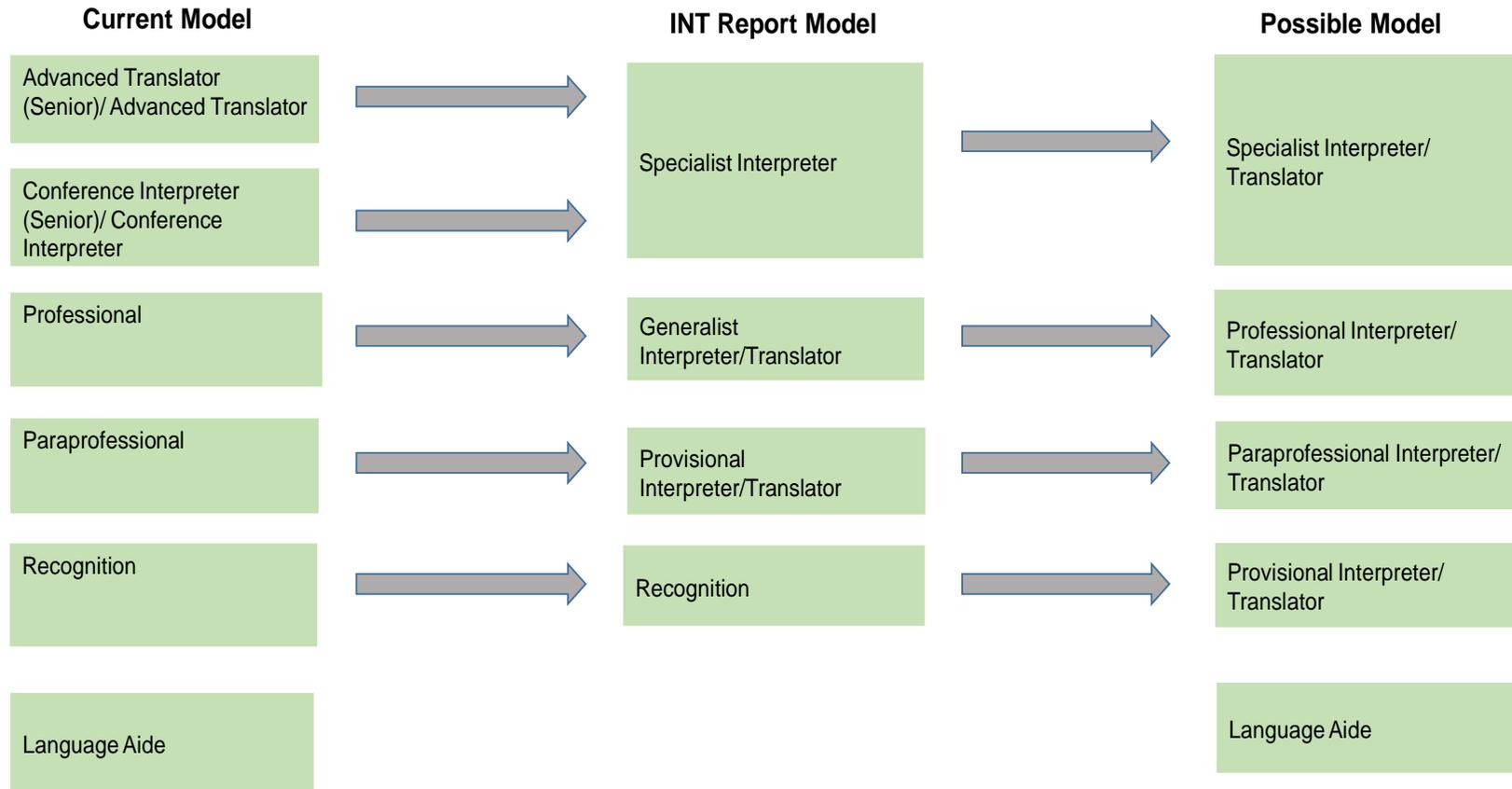
Transition

In principle the improved certification system should enable holders of most current credentials to transition to near equivalent new levels where they exist. To illustrate, what we describe in Attachment C as the Professional Interpreter level would probably be close to the current Professional level and so could allow transition of holders of that credential. More work is needed on whether and how Conference and Advanced level credentials might transition.

Revalidation

A condition of the issue of all new credentials will be that they are subject to Revalidation. Revalidation will probably continue to be on a three year cycle.

POSSIBLE NEW MODEL FOR NAATI CERTIFICATIONS



Please note the New Model:

* is only indicative at this time and will not be final until further work, in particular job task analysis is completed.

* shows descriptions of possible levels not final titles of credentials at this time.

RESPONSES TO INT REPORT RECOMMENDATIONS

1. That all candidates complete compulsory education and training in order to be eligible to sit for the credentialing examinations, in accordance with the new suggested model outlined in section 2.3, Table 7.

More work is needed here. In the meantime candidates will be encouraged to complete training prior to sitting certification examinations. There will be exceptions so this will not be called compulsory. The holders of credentials will all be required to undertake CPD training for Revalidation. The proposed new Provisional credential would only be awarded to candidates who complete specified training.

2. That NAATI produce an information package explaining the meaning of interpreter and translator, prerequisites for testing and expectations of potential candidates, including expected levels of languages proficiency in English and the LOTE, as outlined in section 2.

Agreed

3. That NAATI select (or devise) an on-line self-correcting English proficiency test to be taken by potential candidates for a fee, as part of the non-compulsory preparedness stage, as outlined in section 2.3 and 3.

Agreed in principle, subject to examination of cost and practicality.

4. That NAATI language panels select (or devise equivalent) on-line self-correcting proficiency tests in the various languages to be taken by potential candidates for a fee, as part of the non-compulsory preparedness stages, as outlined in sections 2.3 and 3.1.

More work needed here on costs and benefits.

5. That an Advanced Diploma in any discipline (or equivalent) be the minimum pre-requisite for the Generalist credentialing, and a Bachelor's degree in any discipline (or equivalent) or a NAATI approved Advanced Diploma in Interpreting) be the minimum pre-requisite for Specialist credentialing, as outlined in section 2.

Candidates will be encouraged to seek generalist certification through qualification pathways but translating or interpreting qualifications will not be mandatory pre-requisites because of the limited availability of courses. As at present for the Professional level a degree or diploma in any field will be a preferred pre-requisite but will not be mandatory. If specialist certification is offered through testing a qualification in translating or interpreting might be a pre-requisite or specialist certification might be limited to candidates who complete an approved specialist qualification i.e. with no separate testing.

6. That the current levels of credentialing be replaced by a Generalist level (for both Interpreting and Translation) and Specialist credentials for Interpreting, with a Provisional Generalist level with a sunset clause of 2 years, particularly for new and emerging and Aboriginal languages, as explained in section 2.

A new Specialist credential will be created for both interpreting and translating and credentials comparable with the current generalist levels (Professional and Paraprofessional) will be retained with changes. A new generalist Provisional entry level credential will be created.

7. That the following specialisations be established for Interpreter credentials: Legal, Medical, Conference and Business (see Table 7), with Legal and Medical having priority over the other two, as explained in section 2.3.

Agreed possibly with Mental Health and Education added subject to further work.

8. That NAATI move to computerised translator tests in the first place. Secondly, that test candidates undertaking computerised translator tests be allowed access to the internet while taking the test, taking account of security considerations.

Keyboarded translator testing is agreed in principle subject to costing and resources. Whether access to the internet during testing will be agreed will require more work.

9. That Interpreting tests be conducted live, as much as possible. Where this is not possible, that candidates be provided with video recorded interactions and that their performance be video recorded for marking.

Not agreed because of assessment standardisation and cost concerns. Video recording instead of audio recording might be possible and will be examined.

10. That interpreting tests at the Generalist level for both spoken and signed languages include a telephone interpreting component consisting of protocols for identification of all interlocutors, confidentiality assurances and dialogue interpreting only.

Agreed

11. That a validation research project be conducted to design the new testing instruments for Interpreting and Translation.

Agreed

12. That new assessment methods using rubrics (see Table 8) be empirically tested as part of the validation project.

Agreed

13. That new examiners' manuals be written to reflect the new assessment methods to be adopted.

Agreed

14. That NAATI review the current composition of examiners' panels to include more graduates of approved courses and fewer practitioners who hold no formal qualifications in Interpreting and Translation.

Agreed

15. That examiners undertake compulsory training before being accepted on the panel, and continuous training while on the panel.

Agreed in principle.

16. That NAATI establish a new Expert Panel, with subpanels for the specialisations, to design the curricula for the compulsory training modules and provide guidelines for the final assessment tasks.

Agreed in respect of specialisations. More work needed in respect of Provisional level course/s.

17. That NAATI continue to approve tertiary programs and encourage all applicants to take the formal path to credentialing where such is available for the relevant language combinations.

Whether Approved Courses will continue in their current form will depend on further consideration. All applicants will be encouraged to take the tertiary qualifications pathways where available.