



NAATI Language Service Provider Endorsement Model

Discussion Paper– April 2025

On 6 December 2024, at the Ministerial Forum on Multicultural Affairs, Ministers from Australian, state, and territory governments agreed to NAATI's development of an endorsement model for language service providers (LSPs). The model aims to enhance the quality and consistency of language services, as outlined in the [Communique](#) from the Ministerial Forum. The model will be presented for final approval at a future Ministerial Forum.

This discussion paper invites feedback from all stakeholders in the development of the endorsement model, which will establish standards for providing interpreting and translation services to government agencies.

This paper sets out and seeks feedback on seven proposed LSP endorsement standards, which have been drafted based on feedback to date from language service providers and professional translators and interpreters:

1. Engagement of NAATI-certified practitioners
2. Professional development
3. Minimum service conditions for practitioners
4. Compliance with relevant industry standards
5. Compliance with data security requirements
6. Adherence to good business practices
7. Quality assurance and complaint handling mechanisms

The paper also seeks feedback on any other elements that should be considered for inclusion in the model.

Submissions

All interested parties are invited to submit responses to this discussion paper.

- LSPs interested in government procurement are encouraged to collaborate with NAATI in developing the endorsement model.
- Government agencies procuring language services are encouraged to comment on the model's objectives, in anticipation that each jurisdiction will incorporate the model into its procurement practices.
- Practitioners **and other interested stakeholders**, including peak bodies and organisations reliant on high-quality language services, are encouraged to provide feedback.

Submissions should be sent to LSPendorsement@naati.com.au by 30 April 2025.

Standard 1: Engagement of NAATI-certified practitioners

Intended outcomes for Standard 1

LSPs engage NAATI-certified practitioners to deliver language services in all government communication assignments. Evidence that this is occurring will be provided by LSPs through regular reporting confirming the practitioners' NAATI certification.

Issues for consideration

Benefits of engaging NAATI-certified practitioners over non-certified practitioners

Engagement of NAATI-certified practitioners underpins accurate and culturally appropriate communication, required in complex and high-risk communication exchanges in health care, legal hearings, government service delivery and other settings.

Language services guidelines

Engagement of NAATI-certified practitioners to deliver language services for government departments and agencies, particularly in complex and high-risk settings, is recommended in various government standards and guidelines.

Lack of rigorous implementation of language services standards, guidelines and accountability

Despite government standards and guidelines in relation to engagement of NAATI-certified practitioners, there is inconsistent implementation and reporting of this requirement. Occurrences of low-quality language services due to failure to engage NAATI-certified practitioners are a serious risk in all communication assignments, particularly high-risk settings such as aged care, public hospital and health services, courts and government funded programs.

In a 2023 survey of translators and interpreters conducted by the Department of Home Affairs, 19 per cent stated that they do not have a NAATI certification and 72 per cent said they know of non-NAATI certified interpreters being used in high-risk assignments.

Costs of low-quality language services

Also in 2023, the Department of Home Affairs commissioned Deloitte Access Economics to estimate the economic and social cost of sub-optimal interpreting service interpreting in 5 select settings¹, which was estimated at \$326 million per annum, rising to \$892 million per annum when latent demand was factored. Sub-optimal interpreting can result in inadequate patient understanding, longer hospital admissions, delayed hearings (when intervention is required due to poor interpreting) and appeals against court decisions.

Market structure and effect on practitioners

Practitioners often experience a lack of regularity and consistency in their employment. Assigning work to non-NAATI-certified individuals intensifies competition and exacerbates the insecurity of employment conditions.

Discussion questions

Question	Standard 1: Engagement of NAATI-certified practitioners
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Q1.1	What challenges have you faced in recruiting or procuring the services of NAATI-certified practitioners?
Q1.2	How can NAATI and LSPs work together to ensure NAATI-certified practitioners are always engaged (in the languages where NAATI certification is available)?
Q1.3	What measures would be reasonable for LSPs to take to support non-certified practitioners to obtain certification?
Q1.4	Do you have any other comments in relation to Standard 1?

Standard 2: Professional development and training for practitioners

Intended outcomes for Standards 2

LSPs have a procedure to identify practitioners' professional development (PD) and training needs and how best to support them to undertake relevant PD and training.

LSPs support individuals to obtain and maintain NAATI certification.

Issues for consideration

Over 80% of respondents of the 2023 Department of Home Affairs survey identified additional training and capacity building as one of the key issues that need to be addressed. Supporting practitioners to undertake professional development and training would support NAATI's recertification requirements, enhance retention rates for NAATI-certified practitioners and improve the quality of language services.

Discussion questions

Question	Standard 2: Professional development and training for practitioners
Q2.1	What types of professional development and training would be most beneficial for practitioners?
Q2.2	What challenges, if any, might LSPs face in supporting the professional development and training of practitioners?
Q2.3	How could LSPs collaborate with NAATI, AUSIT and other recognised training organisations to effectively offer professional development and training opportunities for practitioners?
Q2.4	How frequently should LSPs be expected to support practitioners in their professional development and training, and what would be a reasonable expectation for this support?
Q2.5	Do you have any other comments in relation to Standard 2?

Standard 3: Minimum service conditions for practitioners

Intended outcomes for Standard 3

For interpreting assignments

Interpreters are engaged for longer minimum periods of time after the initial payment period to discourage discontinuation of the current assignment before its completion, in order to begin a newer assignment at the higher initial rate.

Practitioners receive adequate briefing prior to undertaking high-risk or complex assignments.

For translating assignments

The continued role of NAATI-certified translators is recognised to ensure the highest quality, contextually accurate, and culturally appropriate public information products. There should be appropriate arrangements for engagement of translators in place that take into account rapidly increasing application of technology in the sector to ensure translator workforce sustainability.

Translators are engaged for minimum periods to complete translation work.

Issues for consideration

For interpreting assignments

There is evidence that aspects of the current common payment structure for interpreters incentivises them to end assignments prematurely in order to begin a new assignment and receive a higher rate for the initial period. This behaviour causes disruption to clients' communication needs and risks additional costs in time, money and wellbeing for both parties to the communication exchange, as they need to find a replacement interpreter either immediately or resume the appointment at a later time. The consequences of the disruption are much greater if happening in complex or high-risk circumstances, such as legal and health care settings, resulting in additional economic and social costs.

Interpreter respondents in the 2023 Department of Home Affairs survey reported lack of preparation time for assignments as one of the main problems they were faced with, with over 56% attributing lack of pre-briefing and research time for assignments as having a large impact on practitioners' retention rate.

For translating assignments

For translation work, there are reports of a wide range of per word rates of payment. Having inadequate time to complete translation work was raised in the 2023 Department of Home Affairs' survey, with 37% of translator respondents reporting they very often or often have insufficient time to complete their assignment. In addition, with the increasing adoption of Machine Translation including AI assisted translation, the primary role of a translator is changing. Post-machine editing work is often remunerated at a lower rate.

Discussion questions

Question	Standard 3: Minimum service conditions for practitioners
Q3.1	What arrangements for engagement time have been effective in incentivising practitioners to stay on and complete an assignment instead of discontinuing an assignment prematurely to take up another assignment?

Q3.2	What measures could be adopted to provide adequate pre-briefing for interpreters?
Q3.3	What are reasonable minimum engagement periods for translating work?
Q3.4	What measures can be taken to ensure attraction and retention of translators, particularly as their work evolves with greater use of technology?
Q3.5	Do you have any other comments in relation to Standard 3?

Standard 4: Compliance with relevant industry standards

Intended outcomes for Standard 4

LSPs align with and where required comply with government guidelines, sector codes and industry standards relevant to the services they provide.

Issues for consideration

Australian standards and guidelines

- Relevant government guidelines on language services maintained by the Australian, state and territory governments
- Alignment with AUSIT Code of Ethics and other guidance such as [AUSIT-FECCA Guidelines for Community Translations](#)
- [Recommended National Standards for Working with Interpreters in Courts and Tribunals.](#)

International standards

Quality standards for language services have been codified by the International Standards Organisation (ISO) for some time. These standards are available for purchase and are subject to copyright. The content of the standards cannot be shared in significant detail. It is acknowledged that often ISO standards are also intended to establish international benchmarks for service quality. The LSP endorsement model is not seeking to duplicate what already exists to underpin quality and to provide assurance to customers. Neither is the model intending to replicate items which might not apply to Australian requirements. Nevertheless, ISO standards and certifications are an important element of the assurance uplift the model.

Translation Standards

- ISO 17100 Translation Services
- ISO 18587 Post-Editing Machine Translation
- ISO 20771 Legal Translation

Interpreting Standards

- ISO 18841 Interpreting Standards
- ISO 20228 Legal Interpreting
- ISO 21998 Healthcare Interpreting
- ISO 13611:2024 Interpreting services – Community interpreting – Requirements and recommendations

Using Machine Translation tools and AI Assisted Technology

LSPs and their contracted practitioners that use technology-based tools, including Computer-Assisted Translation (CAT) tools, Artificial Intelligence-Assisted Translation (AIAT) tools or any Machine/AI Translation tools, to develop their translation materials must ensure they have appropriate systems and policies in place that include human translators' oversight of the translation outputs and the translation outputs meet the professional standards.

NAATI has released a [Position Statement on the Use of AI for Translation and Interpreting Purposes.](#)

Discussion questions

Question	Standard 4: Compliance with relevant industry standards
Q4.1	What considerations does your business have in meeting buyers' expectations as set out in their language service guidelines, and in supporting practitioners in their professional conduct, as set out in AUSIT codes and best practice guidelines?
Q4.2	What considerations and/or issues does your business or government agency have in relation to obtaining the ISO standards relevant to the services you provide?
Q4.3	What mechanisms can LSPs have in place to ensure translation outputs developed using technology-based tools, including CAT, Machine Translation and/or AIAT tools, meet professional standards?
Q4.4	Do you have any other comments in relation to Standard 4?

Standard 5: Compliance with data security requirements

Intended outcomes for Standard 5

LSPs comply with data security requirements and have in place appropriate policies to:

- prevent unauthorised access or use by a third party to information provided by government agencies or clients' personal information
- prevent disclosure of any confidential information they or their contracted practitioners receive from government agencies and clients
- manage cyber security, including a Cyber Incident Response Plan.

Issues for consideration

LSPs work with information resources provided by government agencies and personal information provided by people in the community and are required to protect the security and confidentiality of the information they receive.

At the Australian Government level, the security requirements for organisations providing services to Australian Government agencies are outlined on the Department of Finance's website at [Security requirements | Selling to Government](#).

There are existing ISO standards on information security.

- ISO/IEC 27001:2022: Information Security Management System standard
- ISO/IEC 27017:2015: Information technology — Security techniques — Code of practice for information security controls

Discussion questions

Question	Standard 5: Compliance with data security requirements
Q5.1	What considerations does your business have in relation to meeting the data security and privacy security requirements of the Australian, state and territory governments?
Q5.2	What considerations does your business have in relation to meeting other recognised international standards?
Q5.3	What mechanisms can LSPs put in place to ensure their contracted practitioners' devices meet minimum security standards and practitioners implement mitigation strategies against cyber security threats?
Q5.4	Do you have any other comments in relation to Standard 5?

Standard 6: Good business practices

Intended outcomes for Standard 6

LSPs operate in a transparent way, in relation to engaging contractors and sub-contractors (including monitoring practitioners' sub-contracting). LSPs have systems in place to verify the practitioners' NAATI certification.

LSPs apply best industry practices, including best practices on the use of CAT or AIAT tools, and deliver outcomes that meet professional standards.

Issues for consideration

Business Code of Conduct

The Business Code of Conduct developed by the Australian Association of Language Companies (AALC) include the following professional standards (the standard on Branding has been removed due to its irrelevance to the current discussion):

General Business Conduct

1. Capability:

1.1. Member companies shall only undertake assignments that they are able to perform to a standard of quality which fully meets the agreed needs of the client.

1.2. Member companies shall use professionally skilled, competent translators and/or interpreters who are qualified by education, training and experience to successfully carry out their assignment(s).

2. Confidentiality: Member companies shall safeguard confidential information of both present and former clients and shall not misuse such information to their disadvantage. Member companies shall also ensure that subcontractors have signed confidentiality/non-disclosure agreements before handling confidential information of any client.

3. Transparency:

3.1. Member companies shall be upfront and transparent with clients about subcontracting practices, Quality Assurance processes used (if any) and actual deliverables.

3.2. Member companies shall be upfront and transparent with subcontractors about required delivery standards and expected quality.

4. Fair treatment: Member companies shall be subject to a general duty to fairly treat and provide due process to their employees, clients, fellow members, translators, interpreters, subcontractors, other parties within the translation/interpretation profession and members of the public.

5. Professionalism:

5.1. Member companies shall neither unjustifiably criticise the work of others nor make misleading claims about their own capabilities in order to solicit business.

5.2. Member companies shall engage in conscientious conduct related to soliciting business, in particular in circumstances involving subcontracting.

Discussion questions

Question	Standard 6: Good business practices
Q6.1	What constitutes good business practice from the perspective of your business?
Q6.2	How should good business practices be incorporated in the LSP endorsement model?
Q6.4	Do you have any other comments in relation to Standard 6?

Standard 7: Quality assurance and complaint mechanisms

Intended outcomes for Standard 7

LSPs have an effective quality assurance program and complaint mechanism in place. LSPs will report periodically to NAATI on how they manage the quality assurance process and handle complaints, and the system must be available for auditing if required.

Issues for consideration

Effective monitoring of the quality of language service provision

There does not seem to be an effective mechanism in place allowing for rigorous monitoring of the quality of language service provision to government agencies. Lack of an effective monitoring mechanism hinders government agencies from acquiring an adequate understanding of how effective the language services they procure are in ensuring effective delivery of their services.

To ensure language services that meet government agencies' needs are delivered to high-quality standards, it is important that LSPs have in place a comprehensive quality assurance program and effective complaint mechanism that is easy for clients with limited English to access. An effective complaint mechanism also helps LSPs and their contracted practitioners identify areas for improvement and support continuous improvement.

Discussion questions

Question	Standard 7: Quality assurance and complaint mechanisms
Q7.1	How do you envisage the LSP endorsement model would assist your agency to mitigate risks associated with a lack of a rigorously monitored mechanism of language services provision?
Q7.2	What elements of business and service delivery should the quality assurance process encompass?
Q7.3	What considerations does your business have in relation to establishing a complaint handling mechanism and reporting on it?
Q7.4	Do you have any other comments in relation to Standard 7?

Any other comments

Please provide any further comments on the proposed LSP Endorsement Model and any other standards that you would like to see incorporated in the model.