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## For public consideration: Proposed measures for language services provider endorsement

Dear Language Services Professionals and Other Important Stakeholder/s,

As you may be aware, on 6 December 2024 NAATI was tasked by ministers at the Ministerial Forum on Multicultural Affairs to develop an endorsement model for language service providers (LSPs). The endorsement model intends to enhance the quality and consistency of language services at the Commonwealth, state and territory levels, as outlined by ministers in the Forum's <u>Communique</u>.

NAATI is jointly owned by the Australian, state and territory governments to set and maintain high national standards for the translating and interpreting sector. To that extent, NAATI has been pleased to support governments in their efforts to address several of the issues currently impacting the accessibility, timeliness and quality of translating and interpreting services.

NAATI has now developed a preliminary set of endorsement measures based on initial feedback received earlier this year (at Attachment A). NAATI invites all stakeholders to provide feedback on these draft measures. Feedback should be directed by email, to <a href="mailto:lspendorsement@NAATI.com.au">lspendorsement@NAATI.com.au</a>. Feedback is required by Close of Business Friday 15 August 2025.

Addressing the sustainability of the language services sector is a shared responsibility. While any endorsement model may provide a much-needed framework for LSPs and governments in driving consistency and accountability, heavy lifting in equal parts from government agencies, peak bodies, unions, employers and practitioners will continue to be required if we are to deliver lasting change for the sector and those that rely on it.

I look forward to receiving your feedback.

Kind regards,

Mark Painting

CEO

# Attachment B - LSP endorsement model: possible measures

Government agencies would require LSPs to be endorsed as a pre-requisite to being successful in winning government tenders/contracts.

The following measures have been developed based on the feedback received to the possible areas for LSP endorsement, outlined in the April 2025 discussion paper. The following measures are conceptual in format and are proposed for in-principle agreement – subject to industry feedback – by ministers at the next Ministerial Forum on Multicultural Affairs, to be held later this quarter.

Any measures that are agreed to by ministers on an in-principle basis would require further detail before seeking final ministerial agreement. These details would be developed by NAATI on behalf of governments, together in partnership with industry representatives, through a NAATI-led working group.

Final agreement would be sought from ministers at the end of 2025, with implementation an LSP endorsement pilot immediately thereafter.

LSP endorsement would be piloted as a requirement of Services Australia's major Interpreting and Translation Services whole-of-Australian-Government Panel (SON3737558), when it next goes out for Tender (expected late 2025 / early 2026).

The pilot would be independently evaluated in late 2026, and – subject to the outcomes of evaluations and agreement by governments – be introduced in a phased approach across a jurisdiction's tendering arrangements, over time, as tenders are refreshed.

#### LSP endorsement model measures

It is proposed that LSP endorsement would require:

# 1. Language Service Providers (LSPs) to:

- ensure that all language practitioners employed and/or contracted to provide language services on their behalf to have obtained, at a minimum, a NAATI Recognised Practising certification in their chosen field within 12 months of having commenced work;
- b. prioritise translating and interpreting jobs going to the NAATI-certified practitioner with the highest level of credential/s, subject to the appropriateness of the assignment and their ability to complete the task;
- c. agree to an LSP Code of Conduct. The Code would establish a set of government expectations to support the delivery of services to a consistent, professional standard, for the long-term benefit of communities who require those services;
- d. agree to establish minimum work assignment periods, for sector consistency, dependent upon the type and/or format of the assignment (e.g. translation or interpreting assignment, face to face, or virtual or telephone assignment) (see 3a);
- e. have in place cyber security measures, and information privacy practices consistent with relevant Australian standards;

- f. establish and/or maintain mechanisms for service quality assurance and feedback;
- e. report de-identified data to NAATI periodically about the services delivered to
  government agencies, including the frequency of engagement of non-certified
  practitioners, the languages and locations of the services delivered, whether services
  were delayed and/or demand unmet, and the number and details of any complaints).
  Explanations would be required if/where a staff member with no NAATI certification is
  assigned; and
- f. display visibly on their websites that they are an Endorsed Language Services Provider (precise terminology and logo to be developed by NAATI and agreed to by Australian, state and territory governments).

**Note:** Failure to comply with any of the conditions above may result in an LSP being dis-endorsed and/or not being renewed by the agency responsible for the Tender/s, depending upon the nature and severity of the breach, subject to NAATI's findings and agreement by the Government agency responsible for the Contract.

#### 2. NAATI to:

- a. cover the costs, upon introduction of the model, to ensure all current practitioners
  working with LSPs can hold at least a NAATI Recognised Practising credential, with LSPs
  and/or individual practitioners to take responsibility for their own credential costs
  on/after 1 January 2027 (subject to the outcomes of the pilot); and
- b. establish a reporting, monitoring and compliance function for the endorsement model, including expanding NAATI's existing complaints mechanism to enable receipt of complaints from clients, practitioners and LSPs.

**Note:** As a government-owned and not-for-profit entity, NAATI would prioritise supporting LSPs, industry representatives and practitioners as part of a continual improvement cycle to deliver good practice, with punitive approaches to be taken as last resort, wherever possible.

#### 3. Contracting agencies to:

- a. set clearly defined minimum work assignment periods, for sector consistency, depending upon the type and/or format of the assignment (e.g. translation or interpreting assignment, face to face, or virtual or telephone assignments) (see 1d);
- b. have processes in place and/or contractual details regarding the inclusion of pre-briefing or warm handover/s for practitioners, where possible, to ensure general awareness of assignment detail (at a minimum) prior to the commencement of an assignment; and
- c. make accessible, either digitally or through other means, regularly utilised terminology and/or other relevant reference materials to LSPs in advance of the commencement of an assignment.

### Complementary partnership measures

In addition to the possible LSP endorsement model measures specified, the following complementary measures have been proposed. These additional measures are based upon the feedback received from across the sector to NAATI as part of the April 2025 Discussion Paper, and would play an important role in supporting LSPs as part of an industry-wide, partnership-approach to addressing the issues impacting the language services sector.

It is proposed that these partnership measures would require:

#### 1. NAATI to:

- a. provide scholarships through a dedicated, ongoing program covering certification and re-certification, with priority given to in-demand languages as well as a commitment to increase overall pass-rates amongst applicants sitting the tests;
- b. introduce a new suite of professional development content available to all NAATI-credentialed practitioners (including those with a Recognised Practising credential), to be made available in 'NAATI Learn';
- c. establish an EAP-style program that provides free, professional, and confidential counselling services available 24/7 for NAATI-credentialled practitioners;
- d. provide a modest amount of funding to AUSIT and ASLITA annually, subject to their support, to assist the volunteers stewarding these critical, member-led industry associations, to deliver current and/or new sector initiatives as required;
- e. work with sector experts to develop a public awareness campaign on the value of an interpreter, including publishing a set of 'best practice' service-specific guidance for broader audiences (e.g. purchasers, clients) on the NAATI website, including but not limited to the use of AI, and why language services matter;
- f. take on a strengthened two-way policy and community engagement and liaison role with governments, settlement providers and essential service providers to improve settlement outcomes and inform future migration planning: by reviewing T&I access in specific geographic locations, assessing the language needs of incoming cohorts, and developing partnerships at the local level where unmet demand is highest to improve access; and
- g. display on its website a list of partners who have committed to LSP endorsement and/or this Partnership (e.g. industry associations, LSPs, academic institutions and other businesses) and to promote this body of work nationally to encourage broader community awareness and involvement.

#### 2. Australian, state and territory governments to:

b. develop and disseminate of an internal government communications package, so that individual agencies procuring language services have a greater awareness of the LSP endorsement model, the sector more broadly and the risks associated with sub-standard services, often based on lowest price, rather than broader 'value for money' considerations.

### 3. Professionals Australia to:

a. Establish a Language Services Industry Award, to establish a minimum baseline, as an initial undertaking on remuneration and related employment conditions.

**Note:** If LSPs are endorsed and an industry award is in place, LSPs and Professionals Australia may wish to consider multi-employer bargaining opportunities - including whether any standards set out in the bargaining agreement can be applied amongst employees and contractors equally. If a multi-employer bargaining agreement was in place, industry representatives (e.g. Professionals Australia, AUSIT and ASLITA) may wish to consider the appropriateness of highlighting these 'employers of choice' amongst their membership/s.

### 4. The broader industry (all interested parties) to:

- a. develop and/or share with one another new and emerging professional development initiatives if and as they arise; and
- b. highlight good practice career opportunities, where possible, to more clearly demonstrate the sector's value in supporting the Australian community.