

Auslan Language Services and the NDIS:

Ensuring Quality in an Environment of Workforce Shortage

The Deaf Society
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Contact

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Equity for deaf people

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STEERING COMMITTEE AND ENDORSEMENT

The project steering committee consisted of:

Name	Position and Organisation
Bethany Evans	Community Development Worker, Able Australia, Deafblind Services
Della Goswell	Lecturer, Convenor Auslan-English Interpreting Program, Macquarie University
Jordanna Smith	President, Deaf Australia (NSW)
Kathy Wright	Vice President, Australian Sign Language Interpreters' Association, NSW

This report has been endorsed by the following people/organisations:

Able Australia

Andrew Wiltshire, Manager, Community Services, the Deaf Society

Australian Sign Language Interpreters' Association, NSW

Deaf Australia (NSW)

Deaf Can:Do, The Royal South Australian Deaf Society Inc.

Della Goswell, Lecturer, Convenor Auslan-English Interpreting Program, Macquarie University

Tasmanian Deaf Society

ABOUT THE DEAF SOCIETY

The Deaf Society was established in 1913 and is a company limited by guarantee. We are a not-for-profit, bi-lingual, bi-cultural, community-centred organisation which exists to achieve equity for deaf people. Our services include employment services, Auslan interpreting, education and training, independent living skills, advocacy, community development and community services. Our vision is Equity for Deaf People. We work in partnership with the Deaf Community to enhance the quality of life of deaf people, strengthen the community and advocate for changes that will ensure fundamental rights and freedoms.

EXECUTIVE SUMMARY

There are not enough Auslan interpreters to meet the rising demand that will be occasioned by the rollout of the NDIS. This presents a threat to the effectiveness of the NDIS with regard to deaf and deafblind people, and carries risks around quality, timeliness, cost and work health and safety.

Auslan interpreting is a unique skills shortage area. Many skills for work in the disability sector can be acquired in months or even weeks. Auslan, like any other language, takes years to learn to fluency. There is a need to examine all the possible ways the sector can most efficiently utilise the existing workforce while new people are being trained.

The Deaf Society undertook this project to investigate the scope of employment for those without interpreter accreditation, with a view to assessing the potential for the employment of un-accredited people to conduct "Auslan communication support" work with deaf and deafblind participants.

A survey of the Deaf Community found that interpreter accreditation is highly valued, and also that a small percentage of deaf people are not able accurately to assess the risk of using unaccredited practitioners to conduct message transfer between English and Auslan in key settings. For reasons of community preference as well as safeguarding it is not recommended that the NDIS introduce unaccredited communication support as a wide-spread practice. Such a step would also be contrary to current public policy. However, the option should be open where a participant is in a position to make a free and informed choice, and where the setting in question is neither high-risk nor demanding.

This report makes a number of recommendations in regard to addressing the Auslan skills shortage both in the short and the long term. See pages 27-30.

The writing of this report was made possible by a grant from the NSW Organisation Transition Fund.

THE PROBLEM

There are not enough interpreters to meet projected demand for Auslan or deafblind interpreting under the NDIS (see below under *Market Context – Rising Demand*). This presents a risk for:

- the quality of the provision of interpreting under the NDIS
- the timeliness of the provision of interpreting under the NDIS
- package costs
- work health and safety for interpreters and others

This report provides background to the problem and then answers the following questions:

- What are the risks associated with this situation in the short and long term?
- How can the risks best be mitigated in both the short and the long term?

At the end of this discussion, this report outlines the basis of a framework for a decision-making chart support the provision of appropriate Auslan and deafblind language services.

DEFINITIONS

DEAF COMMUNITY

This report considers the Deaf Community as both a disability group because members of the community have their rights protected under the UNCRPD, and a CALD group because the community has a unique language, Auslan, and a unique set of cultural practices which differ from the cultural practices of the wider community.¹ The size of the Australian Deaf Community is estimated to be approximately 9,723 people.²

AUSLAN

Auslan (Australian Sign Language) is the language of the Deaf Community in Australia. It has its own grammar and lexicon; it is not a signed version of English. Signed languages differ from country to country, just as spoken languages do. Signed languages are not contrived or “invented”; they are natural languages, just like spoken languages. Auslan is closely related to both British Sign Language (BSL) and New Zealand Sign Language (NZSL).

DEAF

Deaf people are those who use sign language as a preferred language for face-to-face communication. Deaf people usually have social networks within the Deaf Community.

HARD OF HEARING

Hard of hearing people are those with a hearing loss who use a spoken language as their main means of face-to-face communication and who do not identify with the Deaf Community. As hard of hearing people do not generally use Auslan as their primary language, this group is not a focus of this report.

DEAFBLIND

Deafblind people have both hearing and vision loss, and may communicate in Auslan or English or both, using adapted visual, auditory, and/or tactile modes. They may or may not consider themselves members of the Deaf Community. Although deafblindness is much less common than hearing loss, support needs are typically much higher overall because of greater access barriers.

¹ The term “Deaf” rather than “deaf” is often used to emphasise the CALD nature of the Deaf Community.

² This is the number of people who chose Auslan or another signed language as their language spoken at home in the 2011 census. This number could be an over- or under-reporting of the number of people who consider themselves members of the Deaf Community. See Willoughby (2013).

³ United Nations General Assembly (6 December 2006), *Deaf Language as the Language of the Rights of Persons with Disabilities*. This number could be an over- or under-reporting of the number of people who consider themselves members of the Deaf Community. See Willoughby (2013).

INTERPRETERS

The term “interpreter” refers to a person accredited by the National Accreditation Authority for Translators and Interpreters (NAATI) as an Auslan interpreter (at Paraprofessional, Professional or Conference Interpreter level) or recognised by NAATI as a deaf interpreter.

Accredited Auslan interpreters interpret between spoken English and standard Auslan.

Deaf interpreters are people (usually deaf people) skilled in conveying information from standard Auslan to deaf people with additional communication needs, for example where a deaf person is not fluent in Auslan, often because they had poor education and lack of access to Auslan in early childhood, but sometimes also when they are a recent migrant and are fluent in the signed language of another country.

DEAFBLIND INTERPRETING

Both Auslan interpreters and deaf interpreters may also be skilled in deafblind interpreting. Deafblind interpreting involves the use of tactile or visual-frame methods of communication. Deafblind interpreters need a range of additional skills. In addition to being skilled in adapted forms of communication, they also need to be skilled in conveying environmental information.

Deafblind interpreting requires at least one interpreter to be provided for each deafblind person, even when there is more than one deafblind participant present. This is because deafblind people each have very individual communication needs; many require direct tactile communication, and when visual methods are used, then factors such as lighting and distance from the interpreter are often important for the success of the communication.

NAATI

NAATI is the National Accreditation Authority for Translators and Interpreters. They are responsible for credentialing of both spoken- and signed-language interpreters and translators.

ASLIA

ASLIA is the Australian Sign Language Interpreters’ Association. It is a national organisation with state branches.

DEAF AUSTRALIA

Deaf Australia represents the views of deaf people who use Auslan. It is a national organisation with state branches.

ABLE AUSTRALIA

Able Australia is one of Australia's leading not for profit organisations providing services to people with deafblindness and other multiple disabilities throughout New South Wales, South Australia, Queensland, Victoria, Australian Capital territory and Tasmania.

CONTEXT AND BACKGROUND

POLICY CONTEXT

Australia is a signatory to the United Nations Convention on the Rights of Persons with Disabilities, which provides several protections specific to the language needs of deaf people. The UNCRPD states that signatories should:

provide forms of live assistance and intermediaries, including guides, readers and professional sign language interpreters, to facilitate accessibility to buildings and other facilities open to the public (Article 9.2.e) and other appropriate forms of assistance and support to persons with disabilities to ensure their access to information (Article 9.2.f)

and

(facilitate) the use of sign languages, Braille, augmentative and alternative communication, and all other accessible means, modes and formats of communication of their choice by persons with disabilities in official interactions (Article 21)

and

Persons with disabilities shall be entitled, on an equal basis with others, to recognition and support of their specific cultural and linguistic identity, including sign languages and deaf culture (Article 30.4)³.

The NDIS forms a part of the practical implementation of Australia's UNCRPD obligations. The NSW *Disability Inclusion Act (2014)* supports this principle of individualised support in the context of NSW's transition to the NDIS.

When an individual is deaf, the practical application of these policies will generally include the use of trained and qualified sign language interpreters. The training of accredited sign language interpreters is therefore a matter of importance for the success of the NDIS and the fulfilment of Australia's obligations under the UNCRPD.

The use of NAATI accredited interpreters is strongly supported by Deaf Australia which views the interpretation between Auslan and English as

an essential aspect in the life of the Deaf community and enables equal participation by Deaf persons in the wider community

and states

that employers of interpreters must only employ those individuals who possess Auslan/English interpreting accreditation from NAATI⁴.

The use of NAATI-accredited interpreters has long been a part of public policy in NSW. In 2011 the former Premier of NSW issued advice that organisations receiving funding from any NSW government department are expected to ensure that:

interpreter services are provided to clients when needed, and that appropriate translated materials are made available to support service delivery, promote workplace safety, and encourage business and commerce...⁵.

The 2014 NSW *Government Agency Guide for Effective Communication for People with a Sensory Disability*⁶ provided advice that:

³ United Nations General Assembly. (6 December 2006), *United Nations Convention on the Rights of Persons with Disabilities and Optional Protocol*

⁴ Deaf Australia, "Policy on Interpreting" http://www.deafau.org.au/info/policy_interpreting.php (accessed 4 September 2015).

⁵ Department of Premier and Cabinet. (25 February 2011), *Memorandum M2011-06 Language Services Provision in Multicultural NSW*.

an accredited interpreter is appropriate whenever a person may be disadvantaged without them. This includes situations which require an understanding of complex information of a medical, technical or legal nature or emotional situations when a person's command of English is more limited.

It also stated that communicating in a person's preferred language is always important but is essential when:

- *there is an emergency or person or community threat*
- *the person is required to make significant, informed decisions*
- *assessing, discussing or planning for the person's safety, wellbeing, health or employment.*

The FACS Ageing, Disability and Home Care's *Language Services Guidelines* identify critical points when an Interpreter should be used:

- *when critical information about the client's circumstances need to be communicated and understood by them*
- *when the client is required to make significant, informed decisions about their health care*
- *initial intake/contact when collecting client information and assessing need*
- *when undertaking assessments*
- *when explaining service and therapy options*
- *when client consent is required*
- *for client and carer feedback*
- *when determining appropriate referral*
- *for early intervention and prevention community education/information health promotion activities and*
- *participation in implementation and monitoring of individual plans.*⁷

NSW Health Policy on working with interpreters claims that only professional interpreters are employed, that their language, interpreting skills have been tested and that they are trained in medical terminology.⁸ It states:

It is NSW Government policy that professional health care interpreters be used to facilitate communication between people who are not fluent in English, including people who are Deaf, and the staff on the NSW public health system. The use of professional interpreters allows health professionals to fulfil their duty of care, including obtaining valid consent. The Policy Directive describes the roles and functions of the Health Care Interpreter Service, situations in which interpreters must be used, what to do if an interpreter is not available, and the responsibilities of health care providers when using interpreters.

It also stipulates that:

professional interpreters must be used for admission, medical histories, assessments, treatment plans, consent for procedures, pre-operative and post-operative instructions, explanation of medication, counselling, discharge and basically anything more than simple matters of patient comfort.

The policy context shows a strong trend towards the use of accredited interpreters in light of human rights obligations as well as for reasons of risk management and duty of care. The regular employment of unaccredited Auslan communication support would represent a change in the direction of public policy in this area.

⁶ Department of Family and Community Services. (2014), *NSW Government Agency Guide for Effective Communication for People with a Sensory Disability*.

⁷ Ageing, Disability and Home Care. (May 2012), *Language Services Guidelines*.

⁸ NSW Health. (11 July 2006), *NSW Health Policy on Working with Interpreters*.

AUSLAN INTERPRETER ACCREDITATION

Interpreting is a complex task requiring:

- fluency in both languages,
- skills in message transfer between languages,
- deep knowledge of both cultures,
- adherence to a high standard of professional ethics, and
- specialist knowledge of the setting/s in which interpreting occurs (vocabulary, protocols, etc.).

In most situations where interpreting occurs, the interpreter is the only person who fully understands what is going on in both languages. Other parties are not usually able fully to judge the accuracy of the interpretation as they do not have access to both languages. Interpreter accreditation is therefore essential in providing quality assurance for all parties involved in the interpreted setting.

Credentialing for both spoken and signed languages is conducted by the National Accreditation Authority for Translators and Interpreters (NAATI). Currently NAATI offers the following credentialing for interpreters working in the Deaf Community:

- Paraprofessional Interpreter Auslan/English accreditation
- Professional Interpreter Auslan/English accreditation
- Conference Interpreter Auslan/English accreditation
- Deaf Interpreter Recognition

There is sometimes confusion because clients of interpreters assume that all accreditation enables interpreters to interpret at all levels in all contexts. This is not the case. The distinction between paraprofessional and professional interpreters is particularly crucial. NAATI gives the following outlines:

Paraprofessional Interpreter (formerly known as Level 2): *This represents a level of competence in interpreting for the purpose of general conversations. Paraprofessional Interpreters generally undertake the interpretation of non-specialist dialogues. Practitioners at this level are encouraged to obtain Professional-Level accreditation.*

Professional Interpreter (formerly known as Level 3): *This represents the minimum level of competence for professional interpreting and is the minimum level recommended by NAATI for work in most settings, including banking, law, health, and social and community services. Professional Interpreters are capable of interpreting across a wide range of semi-specialised situations and are capable of using the consecutive mode to interpret speeches or presentations.⁹ [Note that Auslan interpreters typically use simultaneous mode in all settings.]*

A paraprofessional interpreter is suitable for the purpose of giving a deaf person access to non-specialist situations, i.e. relatively predictable everyday settings. For anything more complex, fully qualified professional interpreters provide the appropriate level of quality.

In theory it is possible to fulfil the requirements for Auslan/English accreditation with NAATI without completing any other formal qualifications or training, but this is atypical. Most people interested in a career in Auslan interpreting require study in order to achieve the necessary language fluency and interpreting skills.

INTERPRETER TRAINING PATHWAYS

Language fluency and the ability to interpret are two separate skills and both are required for successful accreditation and employment as an Auslan interpreter. Language fluency must be acquired before interpreting training begins.

⁹ National Accreditation Authority for Translators and Interpreters (2010) *Outlines of NAATI Credentials, Version 1.0.* <http://www.naati.com.au/PDF/Misc/Outlines%20of%20NAATI%20Credentials.pdf> (accessed 24 August 2015)

The typical training pathway for an Auslan interpreter who begins their study with the Deaf Society is:

- Certificate II in Auslan (6 months)
- Certificate III in Auslan (6 months)
- Certificate IV in Auslan (6 months)
- Diploma of Auslan (6 months)
- Diploma of Interpreting (1 year) => **NAATI Paraprofessional Interpreter Accreditation**
- 2 years experience in the field (minimum)
- Postgraduate Diploma of Auslan/English Interpreting (Macquarie University) (2-4 years part-time) => **NAATI Professional Interpreter Accreditation**¹⁰
- Substantial years of wide-ranging and high-level experience => **application for NAATI Conference Interpreter Accreditation**

For entry-level accreditation (Paraprofessional level) the minimum length of study in New South Wales is 3 years,¹¹ but historically it has often taken longer than this because funding for training has been very erratic and not all courses were offered regularly. Training can also take longer if students elect to study the early Auslan certificates at TAFEs which are offered more slowly.

Typically a further 6 years of experience and study would be required for Professional Interpreter level accreditation (2 years of experience at paraprofessional level, then up to 4 years of part-time study to complete the Postgraduate Diploma through Macquarie University). The total time required to train a professional interpreter is therefore up to 9 years if early training is completed promptly.

Deaf interpreters generally acquire their language skills informally through growing up within the community, but often attend at least one training course before applying to NAATI for deaf interpreter recognition. The basics of deafblind communication skills can be acquired in a short course by those already fluent in Auslan, but require many hours of practice in the community in order to achieve fluency. Those engaging in deafblind interpreting require either Auslan interpreter or deaf interpreter credentials.

COST OF ENTRY LEVEL INTERPRETER TRAINING

It is worth noting that under the NSW Smart and Skilled co-contribution scheme, the total out-of-pocket cost to a person to complete all five qualifications required to acquire Auslan skills and become a qualified paraprofessional interpreter is \$13,690. This presents a significant barrier to workforce development.¹²

SUPPLY PROBLEM 1 – WORKFORCE DEVELOPMENT

The interpreting workforce, as a relatively niche market, has not been a target of consistent government investment. While the Commonwealth has invested in various schemes for the provision of interpreters (see below under *Market Context*), the New South Wales training system has failed to produce sufficient graduates to meet demand in this market.

The Deaf Society raised the issue of Auslan workforce development in its submission to the Productivity Commission on Disability Care and Support in 2010. It takes a minimum of three years to train an entry level paraprofessional Auslan interpreter (even using the Deaf Society's intensive training delivery methods), so early action was required in order to avert a crisis with the introduction of the NDIS.

It was not until 2013 that the NSW Government recognised Auslan and Auslan interpreting as skills shortage areas, and it was not until early 2015 that the Department of Education and Communities (DEC)

¹⁰ It should be noted that interpreters in Victoria who wish to complete training to become a professional level interpreter sometimes also have the option of completing a 1-year training course at RMIT, which is run from time to time. The Macquarie University course is the only course of its kind available across the whole of Australia.

¹¹ Other states vary widely in the length of time taken to complete Auslan and interpreting training.

¹² A recent announcement by John Barilaro, Minister for Skills, Regional Development and Small Business, indicates that the costs for Auslan courses may be reduced. "Investing in the Skills to Deliver NDIS Jobs" Media Release, 6 September 2015.

provided funding to the Deaf Society to conduct additional Auslan training in New South Wales under Smart and Skilled. Students beginning their training in 2015 using the Deaf Society's intensive delivery model are now expected to enter the interpreting workforce shortly after NDIS full-scheme is reached.

In the meantime the Deaf Society and TAFEs have provided Auslan training as far as possible within funding constraints. Since the 1990s the Deaf Education Network (now the education and training department of the Deaf Society) has delivered Auslan courses in an intensive mode with each course lasting 6 months. The Deaf Society provides all Auslan courses up to and including the Diploma of Auslan. TAFEs have usually provided courses only at Certificate II and III levels on a part-time basis, with each certificate lasting up to two years. Sydney Institute of TAFE has traditionally provided the Diploma of Interpreting every second year, with the last offering in 2013. Since 2015 the Deaf Society has been providing the Diploma of Interpreting.

Over the last ten years, the DEC has provided limited funding for some Auslan language training through the Deaf Society (see Appendix 1). However, as funding was always uncertain, intermittent, and often for only a percentage of places in any given course, it has been very difficult to establish reliable pathways for students from beginner level to entering the interpreting workforce at paraprofessional level. Often students have waited in between courses for the next funded course at their level. It has been possible to provide some courses on a fee-for-service basis, but generally these have had to run at a loss in order to keep fees affordable for students.

This training system has produced a "trickle" of Auslan interpreter graduates, but has failed to keep pace with sharply rising demand.

SUPPLY PROBLEM 2 – WORKFORCE RETENTION

The interpreting workforce is considered to have a relatively high turnover, although there is a lack of nation-wide empirical data. A report by the NMIT Centre of Excellence for Students who are Deaf or Hard of Hearing (2006) investigated employment models for interpreters in TAFE settings in Victoria and concluded that:

There is a high attrition rate of interpreters from the field due to poor working conditions. The average turnaround for interpreters is currently three years. This is a poor statistic, as it takes at least that time to train and accredit a new interpreter. If the retention rate for Auslan interpreters to the industry can be increased to five or ten years, the users of the service can only benefit and many of the current issues will be alleviated.¹³

The interpreter workforce is subject to several factors which make it an unattractive long-term career prospect:

- it is highly casualised, with little financial stability
- it is somewhat seasonal, with demand peaking during TAFE/University semester time
- there is a high risk of Occupational Overuse Syndrome (OOS) without adequate WHS protection
- some interpreters feel pressured by employers to accept poor working conditions (e.g. working long shifts alone) which create stress and can cause injury
- while the hourly rate is fairly high, the number of hours that are physically possible in the week are limited (the national Australian Sign Language Interpreters Association policy recommends no more than 5 hours a day in a 5-day working week, i.e. 25 hours per week),¹⁴ so pay from interpreting work alone rarely equates to a full-time professional wage
- preparation time for many assignments can be substantial, and is very rarely paid
- interpreters, especially freelance interpreters, work a lot alone and often lack collegial support

¹³ Centre of Excellence for Students who are Deaf or Hard of Hearing (2006) *There's a hole in the bucket!*. p.11

¹⁴ Australian Sign Language Interpreters' Association (2012) *ASLIA Occupational Health & Safety Policy*
<http://aslia.com.au/index.php/docs/policies-a-procedures> (accessed 24 August 2015)

- interpreters can suffer vicarious trauma from interpreting in emotionally demanding situations such as funerals, assault cases, child custody cases, etc.
- interpreting is sometimes viewed by the wider community as “helping” or “volunteering” rather than a professional occupation

Thanks to the work of ASLIA and others, there have been some improvements:

- interpreters have a greater awareness of OOS and are better trained in strategies to prevent it
- working conditions in some settings are good (e.g. Deaf Societies almost universally insist on two interpreters being booked when an assignment is over one hour)
- the greater availability of part-time contract work helps to reduce financial uncertainty,
- mentoring programs such as that run by the Deaf Society provide collegial support and training
- ongoing work by ASLIA and its state branches in providing professional development
- ongoing work by ASLIA and its state branches in support contact with colleagues

On the other hand, some factors make interpreting an attractive profession:

- it is flexible, allowing a better work/life balance
- it provides a variety of work and settings
- many interpreters report pleasure in accomplishing the technical part of message transfer (it is a highly challenging mental activity)
- it is rewarding to see deaf clients enjoy their right to equal access.

MARKET CONTEXT – RISING DEMAND

While a trickle of new Auslan interpreters has been entering the workforce, and a trickle has been leaving, demand has been increasing over the past three decades. Several factors account for this. Firstly, with the introduction of State and Federal disability discrimination legislation in the 1980s and 1990s deaf people began to access tertiary education and professional employment. This created an increase in demand for the services of professional interpreters in educational and workplace settings throughout the 1980s and 1990s. Auslan interpreting accreditation was introduced in the 1980s to meet the need for the quality assurance of these professional services.

Following the broadening of opportunities and access for deaf people in the 1980s and 1990s, the 2000s saw the introduction of two Commonwealth schemes: the National Auslan Booking and Payment Service (NABS), and the Employment Assistance Fund (EAF). NABS provides interpreted access to private medical services and EAF provides funding for Auslan interpreting and other measures needed for access to employment including interpreting up to a cap of \$6,000 per year. Both have been highly successful. Both have increased demand substantially.

In 2008, Access Economics reported its findings on supply and demand for Auslan interpreters in Australia:

*In 2007 there were an estimated 5,612 Auslan users in Australia – 2,464 females and 3149 males. The average number of Auslan interpreter services utilised was around 30 per annum per user and the average service time was estimated as 59.3 minutes. Including unmet demand, total demand for Auslan interpreting services was 56.2 services (55.4 hours) per person per year. Unmet demand was greatest in Victoria and least in Tasmania. **The FTE demanded in 2007 was 206 across Australia, projected in the base case to increase to 427 FTE by 2030.***

*...there were an estimated 361 interpreters Entries strongly favoured younger cohorts and exits were relatively high from age 40 onwards. The data on average hours worked revealed two workforce segments – in-house part-time or casual workers (43% and 33% of the workforce respectively) and in-house full-time or freelance workers (13% and 11% respectively). Altogether they supplied 269,506 hours of services in 2007 ie, **an FTE supply of 196 projected in the base case to increase to 230 FTE by 2030.** 80% of interpreters are not looking for extra work and about half (49%) have too much work.*

Overall the workforce shortage was estimated as 10.4 FTE in 2007, growing to 196.5 FTE in

2030¹⁵.

It is in this context of this existing workforce shortage that the National Disability Insurance Scheme is being introduced.

A sharp increase in demand for Auslan interpreters was experienced in the Hunter during the first year of the NDIS trial. The Deaf Society completed an analysis of interpreting demand comparing the period January 2013 to June 2013 with January 2014 to June 2014 for the Hunter region only:

- In January to June of 2013, 157.5 hours of interpreting were provided by the Deaf Society in the Hunter region
- In January to June of 2014, 345 hours of interpreting were provided by the Deaf Society in the Hunter region.

The 2014 hours are more than double the 2013 figure, an increase of 119%. They do not account for bookings that were unable to be filled because of a lack of interpreters – these are only completed hours.

Unfilled bookings, however, are already frequent in the experience of interpreting service providers. These can be for very serious situations. In the period 20 October to 20 November 2014, 79 requests received by the Deaf Society's interpreting service were unable to be filled. These included serious medical, legal, mental health, social services and personal situations. A deaf person was prepared for surgery without having an interpreter to convey information about the procedure. A deaf family buried their father in silence because no interpreter was available for the funeral. A longer list of such examples from this sample period is available in Appendix 2.

The experience of rising demand has implications for the sustainability of the disability support system for Deaf Auslan users as the NDIS is rolled out across NSW. These implications are analysed below (see Risks).

NDIS CONTEXT

ASSURANCE AND EMPOWERMENT

The NDIS Strategic Plan 2013-2016 is built on the values of Assurance, Empowerment, Responsibility, Learning and Integrity.¹⁶ The principles of Assurance and Empowerment are particularly relevant in relation to the Auslan skills shortage.

The value of Assurance dictates that all NDIS-funded service provision should be of high quality. At present the main safeguard for the quality of Auslan services is NAATI credentialing of Auslan and deaf interpreters.

The value of Empowerment dictates that deaf and deafblind people should be able to choose preferred providers. In order for this to happen, there needs to be a workforce that is large enough to make the choice a genuine one. As National Disability Services argue, the NDIS should provide "a comprehensive, vibrant and sustainable support sector: where people can choose from a range of services, equipment and other support options which are responsive to their needs, flexible and of reasonable quality".¹⁷

NDIS AND OTHER SERVICE SYSTEMS

Principles have been developed for what NDIS will and will not provide in respect of other services such as health and education.¹⁸

However, the experience of the Deaf Community has been that many smaller and even larger service providers claim "unjustifiable hardship" under disability discrimination legislation and do not provide access. This occurs most commonly in private education, private legal, private hospital, real estate, community and small business settings.

¹⁵ Access Economics Pty Ltd (2008) *Auslan interpreter services in Australia: supply and demand*. pp. i and ii.

¹⁶ National Disability Insurance Agency.

¹⁷ National Disability Services (2013) *Choice and Risk in the NDIS*

¹⁸ Council of Australian Governments

NDIS planners and administrators will see many cases of requests for reasonable and necessary support to gain access to a service where the cost of access would be “unjustifiable hardship” for the service provider. Whether the NDIA funds that support or enters into a conversation with the service provider about paying for it themselves, the process is likely to contribute to demand in areas where deaf people have traditionally simply missed out.

CURRENT PACKAGES

NDIS participants appear to be accessing a wide range of settings using NDIS package funding to enhance their participation through the use of accredited interpreters. Some examples from Deaf Society experience are:

- Personal trainer and Yoga at the Gym
- Funeral preparation
- Private school meetings
- Surf competition
- Technical trade college open day
- Meeting with a shopping centre
- Support group
- Dance performance
- Income tax appointment
- Gymnastics championships

NDIS planners are also of course employing paraprofessional and professional interpreters for planning meetings.

UNACCREDITED COMMUNICATION SUPPORT IN CURRENT PACKAGES

As far as the Deaf Society is aware, the use of unaccredited Auslan communication support has not been widely used in the NDIS Hunter trial site. The Deaf Society is aware of one situation where a client is accessing a religious setting through a non-accredited person. Feedback has been positive. In the opinion of their colleagues, this support worker is close to achieving NAATI paraprofessional accreditation, which may account for the success of this support.

COMMUNITY CONTEXT

SELF-ADVOCACY AND THE DEAF COMMUNITY

The Deaf Community has a unique history which gives rise to particular problems in NDIS implementation.

The NDIS is founded on the principle that people with disability deserve equal chances to participate fully in all areas of life. However, like many disability groups, the Deaf Community has experienced a history of disadvantage which makes poor access the accepted norm. The habit is often to view communication access of any kind not as a right, but as a charity. Although many sections of the Deaf Community have a much greater awareness of their rights, there are still many deaf people who view any effort to accommodate their needs as an imposition on the “hearing” people, and a cause for gratitude.

Compounding this is a history of poor educational outcomes. Studies of deaf school students and school leavers show significantly poorer average literacy outcomes.¹⁹ Deaf people in Australia since the 1950s have typically been educated in oral (non-signing) environments, whether or not they were fully able to access spoken language. Such an education has put many deaf people at a life-long disadvantage which leads to them having low expectations of access.

¹⁹ See Power, D. & Leigh, G. (2000). Principles and practices of literacy development for deaf learners: A historical overview. *Journal of Deaf Studies and Deaf Education*. 5:1 (Winter 2000) pp. 4-5.

A further compounding factor is the lack of accessible information (i.e. information in Auslan) about the rights of NDIS participants. This makes it more difficult for deaf people who do not have good English literacy skills to develop a clear understanding of the NDIS and their rights in accessing it.

People used to a charity model, lacking education, and lacking accessible information about their rights do not have the wherewithal for self-advocacy and are highly unlikely to speak up when access is poor. This lack of self-advocacy makes the implementation of the NDIS more difficult because an NDIS planner or linker or other generalist support person, although theoretically aware of equality of rights, may be unaware of the services and tools available, and is very unlikely to be in a position to assess the quality of a service. This compounds the risk to the value of Assurance in NDIS implementation.

UNIQUE LANGUAGE NEEDS

Unlike other disability groups, however, the Deaf Community uses a unique language. Auslan is the key to access for deaf people, and supports involving Auslan are likely to form the bulk of NDIS packages for deaf people. This situation is unique. No other disability group uses an alternative form of communication which is a full and complete language in its own right. Adaptive communication methods and technologies are used by other disability groups, but only deaf people use a full and completely different language.

This makes the workforce situation for deaf supports unique. Workers can be trained in adaptive communication techniques within days, weeks or months. The acquisition of Auslan, like the acquisition of any other language, takes years. The acquisition of interpreting skills takes longer still.

This is very problematic for NDIS implementation because the timeframe for training the Auslan workforce is necessarily longer and the investment needs to be sustained.

LITERACY

It is sometimes assumed that because deaf people can see, they can read English just as easily as they can access Auslan. As outlined above, this is not always the case. It is difficult to learn a language that you cannot hear, and the education system has not always served deaf people well. The skills of deaf people in reading and writing English vary from beginner level to native level. English texts can therefore be very difficult or impossible to access for some deaf people.

It is important that literacy is taken into account in funding, choosing and providing supports. For example, where a deaf person has good English skills, live captioning can be an appropriate access measure in some situations, and may sometimes provide an alternative to Auslan interpreting. However, if a deaf person does not have the literacy skills to follow captioning, this approach will not be useful, and will be a waste of resources.

TECHNOLOGY CONTEXT

Technology is a potential enabler of greater efficiencies in the use of the existing workforce. The Disability Care and Support Report found that:

innovation will come from people with a disability as users of generic technologies. The internet and Short Message Services (SMS) on mobile phones have allowed easier communication for deaf people. Skype and other video technologies can enable people to interact with others more readily...²⁰.

Both Video Remote Interpreting (VRI) and live captioning have the potential to take some pressure off the interpreting workforce, but they both have their limitations. Technology is certainly a part of the solution to the Auslan skills shortage, but it is no panacea.

²⁰ Australian Government (2011), vol. 2 p. 732.

VIDEO REMOTE INTERPRETING

Video Remote Interpreting (VRI) utilises two-way Video Conferencing technology via a high-speed telephone broadband service to enable a deaf person and a hearing person to converse. It may be used in settings such as an urgent medical appointment, a workplace meeting, job interview, Centrelink or banking appointment.

VRI can enable access when no face-to-face interpreter is available, especially in regional areas when the local workforce is unavailable at the time of the appointment. The use of VRI can cut down travel time and so free up additional interpreter hours, thus alleviating the workforce shortage. It can also be used to provide interpreting quickly such as during natural disasters and in medical emergencies. The *Deaf Victoria Auslan Interpreter Report* recommended that guidelines be developed for the use of Skype in situations where an interpreter was not available²¹.

However, there are some settings where VRI is not able to help. These include deafblind interpreting, (tactile communication obviously cannot happen remotely). VRI also carries with it logistical issues and can have an impact on quality. Napier and Leneham (2011) found that:

...the use of such technology can impact the signed language interpreting process and interpreters in several ways, including the need to adapt signing style to account for the two-dimensional medium, limited options for interpreters to assess deaf client's language needs, less opportunity for interpreters to brief with either party, and difficulties getting a deaf person's attention if the interpreter is in a different location²².

In high-stakes settings, therefore, it is not generally advisable to utilise VRI.

Limitations on the uptake of VRI are also placed on the market by the limited reliability and variable speeds of internet services. This is more problematic in some regions than others.

CAPTIONING

For a percentage of deaf people, live captioning may be an alternative to Auslan interpreting in some settings. For a significant percentage of deaf people, however, captioning will not provide optimal access because of literacy barriers, as outlined above.

Captioning is also not always suitable in all settings, because it only provides one-way flow of information. It is not generally useful in dialogue settings or settings where the deaf person needs to participate in a discussion using Auslan.

THE ROLE OF THE INTERPRETER

The role of the interpreter is to facilitate communication. Neither party in an interpreted setting is qualified to judge the quality of the interpreting work, because neither has full access to both languages. For this reason, interpreters must adhere strictly to a high standard of professional integrity. NAATI requires interpreters to adhere to a code of ethics which demands, among other things, that they conduct themselves impartially, interpret accurately, and maintain confidentiality.²³

The clearly defined role of the interpreter as someone who is there to remove a communication barrier is a critical safeguard. ASLIA (WA) puts it this way:

Interpreters are not support workers or advocates. The role of the Interpreter is to interpret exactly what is said between two or more parties and remove a language barrier. Interpreters abide by a Code of Ethics and must not add, omit or distort any part of that message. They are neutral parties and must not provide any opinions or input into the communication that is taking place.²⁴

²¹ Lowrie. M. (2014), p. 15.

²² Napier and Leneham (2011).

²³ Australian Sign Language Interpreters' Association, *Code of Ethics*.

²⁴ Australian Sign Language Interpreters' Association Western Australia (2015).

Interpreters cannot simultaneously interpret and act in other roles which might conflict with these ethical standards. For example, an interpreter is not an advocate, as advocating would conflict with the ethical requirement to be impartial. Similarly an interpreter does not provide decision support.

*...should an Interpreter also take on a support worker or advocate role – the performance of one of these roles will suffer and the client will not receive either the language access or the support they are entitled to.*²⁵

People who are accredited interpreters may also be employed in other roles, but they would not be expected to undertake interpreting while operating in those roles, as this could compromise the integrity of both the communication and of their work in their original non-interpreting role.

ASLIA provides further information on the role of the Auslan interpreter:

<http://www.aslia.com.au/index.php/interpreting/about-interpreting>

AUSLAN CURRICULUM OUTCOMES

A graduate of any of the four qualifications in Auslan, Certificate II, Certificate III, Certificate IV and Diploma of Auslan, is at no point considered an Auslan interpreter based on these qualifications alone. The only accreditation that makes one a nationally recognised Auslan interpreter is the credential from the National Accreditation Authority for Translators and Interpreters (NAATI).

However, although the Auslan qualifications do not qualify a person as an interpreter, they do provide Auslan skills which broaden employment options in the disability sector and elsewhere.

“Certificates II, III, IV and Diploma of Auslan are the only courses of any type that provide the opportunity to develop the knowledge and skills in the language of Auslan.” – Auslan Curriculum 2010

At each level the language units of the curriculum include examples of situations of the language skills expected from graduates. These outcomes include opportunities such as driving for a disability support service or performing front-of-house roles (Certificate II) through to providing supports such as social supports directly in Auslan to deaf or deafblind participants (Diploma of Auslan). Other areas of work where Auslan skills will be in demand and which do not generally require actual interpreting qualifications include:

- coordination of supports
- guiding for deafblind clients
- any other services where the person already has specialist or semi-specialist skills (e.g. household maintenance, physical wellbeing, audiology)

Appendix 3 contains detailed information about the outcomes and examples of employment possibilities for graduates of each qualification.

RISK, AUSLAN SKILLS SHORTAGE, AND THE NDIS

Two types of risk are relevant to this discussion:

- The risks that an NDIS participant may freely take, in the way that any person might take a calculated risk. This is the “dignity of risk”.
- Risks which are not freely taken, but imposed upon a person by other factors, including workforce shortage.

²⁵ Australian Sign Language Interpreters’ Association Western Australia (2015).

These two types of risk must be distinguished. The exercise of free choice in accordance with personal values is good. Being forced to accept poor access is not. Exercising the dignity of risk does not mean making do with sub-standard services which run contrary to personal preferences.

RISK AND INTERPRETER CREDENTIALING

The transfer of information from one language to another always carries with it a level of risk. Interpreter credentialing reduces this risk by ensuring that the person has the necessary skills to convey the message accurately, repair inaccuracies when they do occur, behave impartially, respect both cultures, and maintain a high level of professional ethics. It is thus the key safeguard for quality interpreting services.

RISK AND THE RIGHT TO CHOOSE

Despite the protection offered by credentialing, a deaf person may choose to take on a higher level of risk and use an unaccredited person in some settings. This is most often for reasons of personal comfort (e.g. taking a family member to a GP appointment, even though they know that they could have a qualified interpreter), but can also be to do with specialist knowledge or shared religious affiliation (e.g. the use of people of the same faith to interpret in religious settings). This represents a risk taken in line with the person's personal preferences and values, and accords with the principle of the dignity of risk.

However, as outlined above, deaf people can be vulnerable to poor quality services because they feel a sense of gratitude and an obligation to put up with poor access. They also may not be aware that a service is of poor quality, because they are unable to hear the source message in English. This is problematic in a policy context which emphasises personal choice. Of course the principle of personal choice is paramount, but there need to be checks in place. Otherwise the NDIS runs the risk of perpetuating cycles of disempowerment in spite of all its best efforts to the contrary.

WHAT ARE THE RISKS?

In an international literature review of the cost of not providing interpreters in health care settings, the researcher concluded that "[t]here was also ample evidence that failing to address language barriers through the provision of professional interpreters had major consequences in terms of health care quality, efficiency and cost..." (Hyman, 2009).

The risks occasioned by the interpreter shortage with respect to the NDIS include risks to participants, to interpreters and to the NDIS itself. They include risks to Quality, Timeliness, Cost and Work Health & Safety.

RISK 1: QUALITY

The anticipated spike in demand for Auslan interpreting will put pressure on planners, participants and service providers alike to find alternative ways to meet this demand. Some possible responses could threaten the quality of service and the achievement of participants' goals. They are:

- restricting the amount of interpreting in NDIS participants' packages
- the use of paraprofessional interpreters where professional interpreters should be deployed
- the use of communication support people instead of interpreters
- the use of other workers, who may or may not happen to be qualified interpreters, to undertake interpreting at the same time as providing another support

Each of these come with significant risks to the quality of the service and of outcomes for deaf participants. The risks of restricting the amount of interpreting in NDIS packages are that participants fail to receive necessary and reasonable supports which allow them to participate in the community on an equal basis with others. As one report puts it: "Without access to NAATI accredited, professional interpreting services, Deaf people report experiences of isolation and marginalisation. They are unable to take part or benefit from the opportunities that are routinely afforded to other members of the community such as access to education, health care, employment, volunteering opportunities, attending events, sports and even their

children's events.”²⁶

The risks of using paraprofessional interpreters in situations where only professional interpreters should be used. According to NAATI, paraprofessional interpreters “generally undertake the interpretation of non-specialist dialogues”.²⁷ They are not yet able to deal with complex or technical information. When they are in a situation that is linguistically, culturally or in any other way too demanding, they may omit crucial information, thus placing participants at risk. For example, an interpreter working in a legal setting may not fully understand the terminology and may therefore omit information about the potential costs of taking legal action, thus leading to the deaf person being unaware of the financial risks they are taking on.

The risk of using communication support people instead of interpreters is that access could be of poor quality, both in terms of the accuracy of message transfer and the ethical standards maintained. When a person undertaking message transfer is not an accredited interpreter, there is no guarantee that the person has the skills for accurate message transfer, fewer ethical standards apply, and the person may not be trained to identify risks. There are unlikely to be any people in the situation who can independently assess the accuracy of message transfer. There can be considerable pressure for the support worker and the deaf person both to save face, leading them to make light of missed information or inaccuracies. The perception that communication is happening when it may not actually be occurring effectively can mislead other people involved in the setting into thinking that the deaf person is fully enjoying their right to access, when this is not the case.

In certain settings, the risks of inaccurate message transfer can have quite catastrophic consequences, such as invalid consent, misdiagnosis,²⁸ legal liability issues, or damage to social or family relationships.

The risk of using other workers to interpret, whether or not they are qualified to do so, is that the impartiality and accuracy of the interpreting could be compromised, as well as the person's effectiveness in their other role. An example of this would be an advocate or support person who was present to support decision-making in a meeting also being expected to interpret information in that meeting. This would create a conflict of interest – as an advocate they are expected to support the deaf person, but as an interpreter they are supposed to be impartial. It would also make it difficult to interpret accurately as the worker would be not only processing the two languages as an interpreter but also attempting to monitor and support the interests of the deaf person as an advocate. This could lead to sub-standard advocacy as well as sub-standard interpreting, in turn potentially disempowering the deaf person, and creating distrust of the interpreting process and the interpreting profession as a whole. Undertaking multiple roles can also give rise to ethical problems around confidentiality.

RISK 2: TIMELINESS

The interpreter shortage is already having an impact on the timeliness of services. When an interpreter is not available when needed, appointments may have to be postponed, or important opportunities may be missed altogether. Sometimes the lack of timely services leads to situations of high risk or serious negative impact such as:

- undergoing surgery without being able to give informed consent
- prolonged mental health crisis
- prolonged housing crisis
- prolonged legal crisis
- delay in receiving services
- delayed NDIS planning meetings
- no access to important occasions such as funerals
- missing out on a job interview

²⁶ Australian Sign Language Interpreters' Association (Victoria) (2012) p. 9.

²⁷ National Accreditation Authority for Translators and Interpreters (2010) *Outlines of NAATI Credentials, Version 1.0*.

²⁸ Lowrie (2014).

Further examples of the impact of the workforce shortage, taken from a sample month of Deaf Society interpreter bookings, are provided in Appendix 2.

It should be noted that although the NDIS is not responsible for providing access to systems such as healthcare and education, the rising demand occasioned by the NDIS will affect interpreter availability in these systems as well.

RISK 3: TRAVEL COSTS

In the Hunter trial site, costs rose very sharply because the local workforce was not able to meet demand. Interpreters from Sydney were deployed, but no interpreter will travel to Newcastle and back for free to do a two-hour interpreting assignment when they could be earning many more hours of pay in Sydney. Payment for travel is necessary in the current market and adds significantly to the costs of interpreting provision, especially for regional areas.

RISK 4: WORK HEALTH AND SAFETY

Another risk associated with rising demand is risk to Work Health and Safety. Interpreters are at high risk of Occupational Overuse Syndrome (OOS) due to the physical demands of moving the arms, hands and fingers at rapid speeds for extended periods of time.

The ASLIA policy on Occupational Health & Safety provides guidelines aimed at preventing injury. They include regular breaks (15 minutes after 50 minutes interpreting), team-interpreting for bookings over 1 hour, and no more than 5 hours of interpreting per day in a 5-day working week.²⁹

However, in a situation of high demand and low supply, interpreters are often put under pressure to work in unsafe conditions, for example working alone for more than 1 hour, or working for more hours per week than is safe. This increases the likelihood of injury.

Each injured interpreter also puts pressure on the workforce. While they are recovering, demand does not decrease. Other interpreters in that region will be under even greater pressure and consequently at higher risk of injury.

COMMUNITY PERCEPTIONS OF NEED AND RISK – SURVEY

In this context, it is very important for NDIS planners and services providers to have accurate information about the perception of need and risk of community members in relation to several questions:

- When and where an interpreter is necessary or preferred
- When and where an unaccredited person conducting some message transfer duties may represent an acceptable level of risk for some deaf people
- How different sectors of the community perceive and take on risk

A clearer understanding of the way community members perceive risks will enable to NDIS to determine whether the risks that participants may accept correspond with the levels of risk that the NDIS considers acceptable.

The Deaf Society conducted a survey of deaf and hearing community members to gauge the perception of need and risk across a number of hypothetical interpreted settings.

METHOD

The Survey was circulated by email and in person by Deaf Society staff contacting clients of various services (employment, community services and regional services), and more widely to the community via the Deaf Society Facebook page.

²⁹ Australian Sign Language Interpreters' Association (2012) *ASLIA Occupational Health & Safety Policy*

116 responses were received, as follows:

- 59 deaf people
- 5 deafblind people / people with Usher Syndrome
- 7 hard of hearing people
- 19 Auslan interpreters
- 16 hearing people with Certificate IV in Auslan or Diploma of Auslan as their highest Auslan qualification
- 8 hearing non-signers
- 2 hearing people who have completed a Diploma of Interpreting, but were not accredited interpreters (accreditation may have lapsed)

Deaf, deafblind/Ushers and hard of hearing respondents were also asked questions about their communication preferences, the frequency of use of Auslan interpreters, and how they communicate with non-signers when an interpreter is not present.

FINDINGS

The survey analysis yielded a number of findings. These are:

- Interpreters can be necessary or preferred in a wide range of settings
- Qualified interpreters are valued over unaccredited workers
- Risk influences choices but risk is not the only factor influencing choices
- A small percentage of deaf people may not always be able to assess risk accurately
- Unqualified people with Auslan skills may not always be able to assess risk accurately
- Labels and communication preferences do not always predict interpreting preference
- There is no “one size fits all”

Each finding is outlined and discussed here.

Interpreters are considered necessary or preferred in a wide range of settings

The overwhelming preference is to have interpreters rather than not to have them. This applies to a wide range of settings.

For 26 separate hypothetical settings the survey asked respondents which scenarios they felt they:

- a) must have an interpreter, or
- b) prefer to have an interpreter, or
- c) don't need an interpreter.

In 21 of these settings over 50% of deaf people indicated that they would require or prefer an interpreter. This result indicates that communication barriers are far-reaching and ubiquitous for deaf people. The preferences of deaf respondents show that there are few settings in which improved communication access would not improve quality of life.

The implication for the NDIS is that many different settings can involve communication barriers and that interpreters can improve quality of life for deaf people in a wide range of settings.

Qualified interpreters are valued over unaccredited workers

In most settings, a majority of deaf people would not “accept people who are not qualified interpreters”. This indicates the centrality of NAATI accreditation as a safeguard employed by consumers themselves.

The likelihood of a non-accredited person being acceptable increases the lower the risk is. However, even the lowest-scoring setting (“swimming lessons for yourself”) still had 24.2% of people who would not accept an unqualified person to convey information to them.

This indicates that deaf and deafblind users of interpreters highly value accredited interpreters over non-accredited communication support in a wide range of settings.

Risk influences choice, but risk is not the only factor influencing choices

The higher-risk a situation is, the more likely all classes of respondents were to say that interpreters were required and that these interpreter should be qualified.

This indicates that tools for the allocation of funding and provision of services would benefit from including an element of risk assessment.

However, some settings scored highly although they were not as risky. These include education settings (95.2% would not accept an unqualified person) and entertainment (75.8%).

Education and entertainment are highly demanding linguistically, and involve fast-paced complex information. These statistics may reflect the fact that an unqualified person will be simply unable to convey the information effectively. This may also account for public events/community festivals scoring relatively highly despite being very low risk.

Funerals also scored very highly, with 90.3% of this group indicating that they would not accept an unaccredited person. This indicates that in times of personal stress, deaf and deafblind people highly value reliable information transfer.

This indicates that tools for the allocation of funding and provision of services would benefit from including assessments of the linguistic and emotional demands of the settings.

A small percentage of deaf people may not always be able to assess risk accurately

The survey included a number of control situations in which it is widely accepted that a very high level of risk is present and where no reasonable person would expect a deaf person to access the situation without an interpreter. These included a job interview, a specialist medical appointment about a serious matter, going to the bank about a loan/mortgage, a court hearing and a legal appointment in relation to writing a will. The expectation of the survey writers was that accredited interpreters would be universally required or preferred by deaf/deafblind/Ushers people with Auslan or tactile communication as their preferred means of communication.

The responses for these control settings from deaf/deafblind/Ushers people with Auslan or tactile communication as their preferred means of communication were as follows:

	Please indicate in which scenarios you feel you must have or prefer to have an interpreter or don't need an interpreter.		Please indicate in which scenarios you would accept people who can sign but are not qualified interpreters eg, family, friends or advanced Auslan student.	
Setting	Must have an interpreter (or prefer to have)	Don't need an interpreter (or prefer not to)	Don't accept - Must have a qualified interpreter	Accept non-qualified person
Going to the bank eg, to discuss mortgage options, take out a loan etc	74.2% (46)	25.8% (16)	72.6% (45)	27.4% (17)
Visiting a specialist Doctor eg, over serious medical issue - heart issue, cancer etc	93.5% (58)	6.5% (4)	91.9% (57)	8.1% (5)

Legal appointment eg, court hearing	96.8% (60)	3.2% (2)	95.2% (59)	4.8% (3)
Legal appointment eg, meeting a lawyer to write your will	93.5% (58)	6.5% (4)	88.7% (55)	11.3% (7)
Job interview	96.8% (60)	3.2% (2)	90.3% (56)	9.7% (6)

Table 1: High-Risk Controls – Responses (respondent profile: Deaf/deafblind/Ushers with communication preference Auslan or tactile communication)

It is striking that deaf/deafblind/Ushers respondents with a stated communication preference for Auslan or tactile communication did not universally require or prefer interpreters in these high-risk situations. Of those who said they would require or prefer interpreting, a small percentage would accept non-accredited communication support instead.

It is difficult to account for this, other than by positing that a small percentage of deaf people have a poor ability accurately to assess certain risks.³⁰ The consequences of breakdowns in communication in these situations could be the loss of health, loss of life, loss of freedom, or significant loss of finances. No ethical service provider with expertise in Auslan interpreting would provide even a newly-qualified paraprofessional interpreter for any of these settings, let alone a non-accredited worker. From a regulatory point of view the provision of unaccredited services in such settings would be reckless negligence.

The inability of a percentage of respondents to identify very high-risk situations is important information for the NDIS and service providers. Policy and practice cannot assume that the preferences of deaf people with regard to using accredited or non-accredited services will always reflect an appropriate level of risk. This also indicates a need for community capacity building so that deaf people can better understand risks, and advocacy and support services to ensure that deaf people facing high-risk situations are in fact able to access high quality interpreting.

Unqualified people with Auslan skills may not always be able to assess risk accurately

In both sets of hypothetical settings qualified professional and paraprofessional interpreters assessed risk differently to those who had Cert IV or Diploma of Auslan as their highest level of Auslan qualification. Qualified practitioners were more likely to think that an interpreter would be needed, and less likely to think that communication could be safely and effectively facilitated by someone without interpreting qualifications.

In the high-risk control settings this difference was particularly clear:

	Please indicate which scenarios in which you think communication could/would be facilitated safely and effectively by anyone who has the equivalence of Certificate IV in Auslan or above but isn't a qualified Auslan interpreter.			
	Non-deaf respondents with highest level of Auslan being Certificate IV or Diploma of Auslan		NAATI-accredited paraprofessional- and interpreter-level interpreter respondents	
Setting	Not acceptable. An interpreter is essential.	Certificate IV in Auslan is acceptable.	Not acceptable. An interpreter is essential.	Certificate IV in Auslan is acceptable.

³⁰ Marschark (2005) notes that “Examination of deaf students’ comprehension of interpreting indicates that they are not as accurate as hearing peers in assessing their own comprehension.” (p. 74). Marschark notes that further research is required to determine the reasons for this. The survey results seem to point to a similar phenomenon – the tendency to believe that one is receiving more from a message transfer situation that is actually the case.

Going to the bank eg, to discuss mortgage options, take out a loan etc	81.3% (3)	18.8% (3)	100% (19)	0% (0)
Visiting a specialist Doctor eg, over serious medical issue - heart issue, cancer etc	100% (16)	0% (0)	100% (19)	0% (0)
Legal appointment eg, court hearing	100% (16)	0% (0)	100% (19)	0% (0)
Legal appointment eg, meeting a lawyer to write your will	87.5% (14)	12.5% (2)	100% (19)	0% (0)
Job interview	75% (12)	25% (4)	100% (19)	0% (0)

Those without interpreter accreditation were not universally able to identify these high-risk settings. Those with interpreter accreditation on the other hand were universally able to correctly identify the high-risk settings.

There could be several reasons for this, but the most likely is that the more extensive the person's experience the better able they are to judge the complexities and risks inherent in a given situation. More experienced practitioners have the clearest understanding of "what can go wrong". Inexperienced signers can be in a situation of "unconscious incompetence" and may be unable to identify situations of high risk.

This has implications for regulation as well as service provision. It appears that some unqualified signers could present risks to their clients through over-estimating their own skills and conducting message transfer work in settings which are too demanding or risky.

Hearing people are more risk aware than deaf people

Amongst hearing respondents, those with Certificate IV or Diploma of Auslan as their highest level of qualification tend to estimate risks as being smaller in comparison to the estimations of qualified interpreters. However, Deaf people appear to estimate risks as being smaller in comparison to the estimations made by both groups of hearing respondents.

The reasons for this trend are not known. One likely explanation is that those with access to both languages and both cultures are better able to identify "what could go wrong" than those who do not have access to both languages, or have not been party to a wide range of interpreting settings. Risks may be "invisible" to deaf people themselves because they lack access to both languages.

This has implications for the NDIS both as a funder and as a regulator in their approach to setting the acceptable level of risk in the use of unaccredited people to conduct message transfer.

There is no "one size fits all"

The survey results showed a wide range of preferences, standards and risk perceptions. A small minority of respondents appeared very happy to take on levels of risk which a reasonable person would consider unconscionable. A large minority would be unwilling to chance the use of unaccredited interpreter even for volunteering work or a community class.

Some individuals made surprising choices, such as identifying spoken English as a preferred language, and then preferring to have an Auslan interpreter at meetings. This indicates the complexities of communication situations and the importance of using individual preferences as a guide rather than applying blanket rules.

One practical implication of this is that the NDIS will need to continue to place individual needs, goals and choices at the centre of planning for deaf people as it does for all other groups. The individualised philosophy of the NDIS is not in question, but these survey results certainly support it.

Another practical application is that conversations about Auslan language supports will need to include some kind of risk assessment.

RECOMMENDATIONS

The risks to quality, timeliness, cost and safety are manifold and complex. So are the strategies for risk mitigation. Nine complementary approaches, each with recommendations, are listed here for the consideration of the NDIS and other stakeholders.

APPROACH 1: NAATI ACCREDITATION AS A PRIMARY SAFEGUARD

There is no question that Auslan interpreter accreditation provides the most practical, the safest and the most widely understood quality safeguard. Without this safeguard consistently applied, the NDIS will fail to achieve the goal of Assurance for deaf and deafblind people.

The correct level of NAATI accreditation needs to be applied so that paraprofessional interpreters are not used in complex situations which they may not be equipped to handle.

Recommendation 1:

That NDIS continues to require NAATI accreditation (at minimum paraprofessional level) for the provision of interpreting and translation services within its safeguarding and quality framework.

Recommendation 2:

That NDIA recognise the difference between Professional and Paraprofessional interpreters in policy instruments and guidelines. As with other interpreting service providers, it could consider investigating differentiated pricing for practitioners with these two levels of accreditation. Before implementing such a system, it would be important to ensure that this would not have the unintended consequence of making the booking of paraprofessional interpreters preferred for work which they were not qualified to carry out.

APPROACH 2: COMMUNICATION SUPPORT

Response of deaf/deafblind/Ushers respondents to the survey show that the use of unaccredited workers to conduct message transfer is not widely preferred or trusted, even in a number of low-risk settings. The use of "Communication Support" or unaccredited people with signing skills should therefore be conducted with caution. The policy framework around this needs to account for the fact that some deaf people appear unable accurately to assess the actual level of risk. It also needs to allow for the fact that a significant minority of deaf people do not appear to trust unaccredited people to conduct message transfer even in situations which may appear to be very low risk.

Recommendation 3:

That the NDIA consider developing and implementing guidelines for assessing risk and the communication complexity of various settings before offering unaccredited communication support for participants.

Recommendation 4:

That the option of unaccredited workers only be offered in situations which have passed a thorough risk assessment.

Recommendation 5:

That the use of unaccredited staff to conduct message transfer in any setting never be forced on a deaf person. The survey results indicate that deaf people are more likely to under- than over-estimate risk.

APPROACH 3: TRAINING

The use of alternative strategies to provide supports is clearly a sub-optimal solution forced upon the sector by the workforce shortage. Investment in training will be the main strategy for the long-term viability of the Auslan workforce.

Recommendation 6:

It is recommended that the NDIA work with state and territory stakeholders to ensure that consistent and sufficient funding for Auslan and Auslan interpreting training is made available in each jurisdiction.

APPROACH 4: SUPPORTING RETENTION

Workforce retention, and even potentially attracting inactive interpreters back into the workforce would help to ease the shortage. Improvements in working conditions may assist with retaining practitioners throughout the NDIS rollout phase.

Recommendation 7:

That the NDIA consider options for supporting the interpreting workforce in line with existing NDIS approaches to workforce development. Such options could include funding for specific projects on workforce retention under the Sector Development Fund.

Recommendation 8:

That service providers continue to work on solutions such as loyalty and recognition schemes. Ideally service providers would be in a position to offer contracted and permanent positions. (The combination of WHS limitations on working hours and the current pricing for interpreting may preclude this option at present.)

APPROACH 5: STRENGTHENING PATHWAYS THROUGH EMPLOYMENT

Those with Auslan qualifications who are not yet accredited interpreters have scope for employment in a range of other support roles. These include:

- coordination of supports
- social support
- guiding for deafblind clients
- transport
- any other services where the person already has specialist or semi-specialist skills (e.g. household maintenance, physical wellbeing, audiology)

Providing these services can generate opportunities to hone language skills, access professional development and develop networks which can support people to become accredited interpreters.

Recommendation 9:

That service providers recruit and identify staff who are interested in a career in Auslan interpreting and invest in their further development.

APPROACH 6: GROWING THE USE OF TECHNOLOGY

Video remote interpreting (VRI) and live captioning can help in some situations to take pressure off the available Auslan interpreting workforce.

Recommendation 10:

That the NDIA train staff in identifying when VRI and other technological supports might be appropriate.

APPROACH 7: FUNDING TRAVEL

The market currently dictates that travel will need to be included in some packages, especially for participants in regional areas, or for participants such as deafblind people who need interpreters with specialist skills who may not be available in their local area.

Recommendation 11:

That the NDIS fund travel for interpreters within packages once other avenues (local interpreters with the right level of accreditation and skill, appropriate remote provision) have been exhausted.

APPROACH 8: EQUIPPING NDIS PLANNERS

Support packages are determined through conversations between participants and NDIS planners. It is critical that planners are able to identify a range of appropriate supports which carry appropriate safeguards.

Recommendation 12:

That the NDIA work with experts in deafness and interpreting to develop training for NDIS personnel on risk-assessment and appropriate cost-effective solutions when working with deaf participants.

APPROACH 9: MAKING THE NDIS AND RELATED SYSTEMS DEAF-FRIENDLY

The more deaf-friendly the NDIS, service providers and other stakeholders can be, the less demand there will be for interpreting hours.

Recommendation 13:

That a deaf-specific LAC role be considered. A deaf-specific role will be able to provide culturally safe services in the same way that indigenous roles do. Such a person would be able to link people to community supports and suggest appropriate solutions more effectively than generalist staff with no knowledge of the Deaf Community, or the communication needs of deaf individuals.

Recommendation 14:

That the NDIA continue its work in equal opportunity employment with a view to recruiting specialist planners who are themselves fluent in Auslan and can work without the need for interpreters. This will take pressure of the interpreting workforce in the intake phase of the rollout.

Recommendation 15:

That the NDIA continue to seek opportunities to produce information in Auslan and make it available on its website. In doing so, it would become a model for the sector.

Recommendation 16:

That NDS include a module on the use of interpreters, including Auslan interpreters, in the Care Careers induction program.

APPROACH 10: DEAF-FRIENDLY INFORMATION SERVICES

A deaf-friendly service is one staffed by people able to communicate fluently in Auslan, with a deep understanding of the Deaf Community and the communication needs of deaf people. Deaf-Friendly information services can assist to take pressure off the interpreting workforce by:

- Providing information directly in Auslan and thus not using interpreters
- Identifying problems before they escalate
- Applying deaf-friendly solutions “first go” and removing the need for repair work later
- Ensuring that deaf people understand the NDIS before they go to their planning meetings, thus saving time for NDIS planners and reducing the likelihood of unnecessary reviews
- Educating deaf people about the range of alternative supports available, e.g. VRI or live captioning, of which they may not be aware

- Educating other stakeholders on the needs of deaf participants, enabling them to reduce the number of contacts with deaf people and thus the number of interpreter bookings

Recommendation 17:

It is strongly recommended that a deaf-friendly information service be funded under the Information, Linkages and Capacity Building stream of the NDIS.

OUTLINE OF A RISK-ASSESSMENT PROCESS FOR COMMUNICATION SUPPORTS

As part of this project, it was considered desirable to provide some kind of framework for the use of planners and service providers who support deaf people in nominating and using appropriate NDIS Supports.

The difficulty with such a framework is that it necessarily over-simplifies a very complex process, and by no means obviates the need for deaf-specialist expertise on the part of the planner or service provider.

However, the following provides an outline of what such a framework may contain.

It should be emphasised that in order to conduct such an assessment correctly, the assessor will still require a detailed understanding of the communication needs of deaf people. The conversation around risk will of course need to occur in culturally safe and linguistically accessible environment in order to come to accurate conclusions.

Principles

In most situations where message transfer occurs, a qualified interpreter is required.

If the setting is low-risk and low-demand, and the participant is in a position to make free and informed choices, then it may be appropriate for them to consider choosing a non-qualified person to conduct some message transfer work.

When considering whether or not unaccredited Auslan communication support could be used, it is important to consider both the **participant** and the **setting** carefully in order to assess the level of risk of providing unaccredited supports.

Settings:

Assess the setting for risk:

- Does the setting have to do with financial, legal, health, employment, social, or educational outcomes for the participant, or any other outcome which is important to the participant? Yes - > requires qualified interpreter.
- Is the setting in any other way high-risk? Yes - > requires qualified interpreter.

Assess the setting for demand:

- Does the setting involve continuous message transfer (e.g. presentations, talks)? Yes - > probably requires qualified interpreter.
- Are there any other factors which could make the setting itself demanding? e.g. the setting is public, the deaf person has limited language skills. Yes - > requires qualified interpreter.

Note: In most high-risk and/or demanding settings, the use of a professional interpreter rather than a paraprofessional interpreter is most appropriate.

Participant:

Listen to the deaf person's opinion about having a qualified interpreter. Deaf people appear to be more likely to under- than over-estimate the level of risk in a given setting. Some deaf people may not be able to

identify risky situations accurately. If a deaf person asks for a qualified interpreter, then it is the appropriate support.

Assess the level of empowerment enjoyed by the deaf person:

- Deaf person’s understanding of rights – does the deaf person understand their right to effective communication? Does the deaf person understand their right to quality services?
- Deaf person’s understanding of the risks – are there any factors which could affect the deaf person’s ability to assess the risks inherent in communication situations? Such risk factors include: lack of natural supports (social isolation), unemployment, lack of access to education, lack of literacy skills, lack of access to information or additional disability.

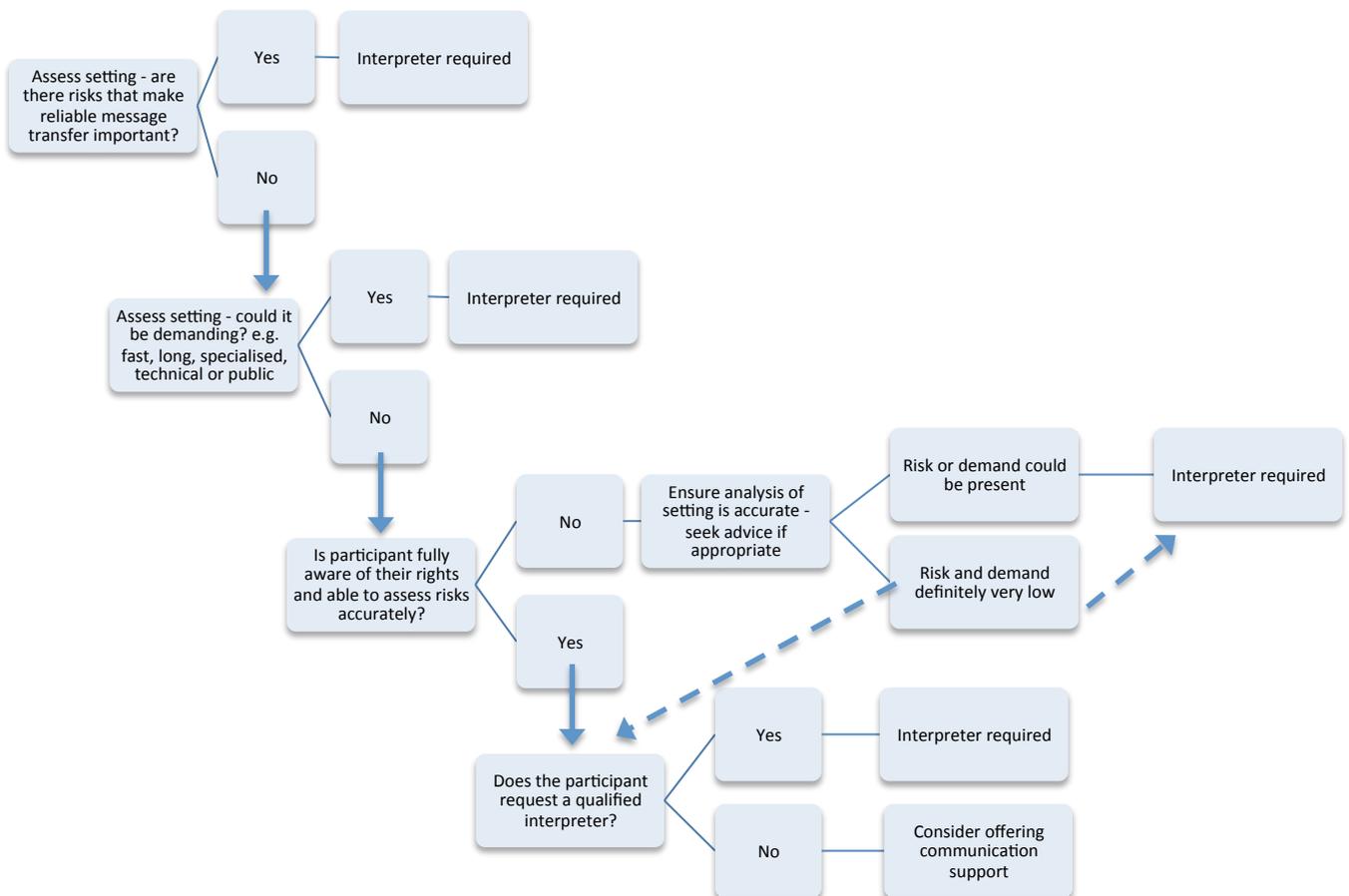


Figure 1: Outline of Risk-Assessment Process for Unaccredited Communication Support

APPENDIX 1: AUSLAN FUNDING TO DEAF EDUCATION NETWORK/DEAF SOCIETY

This table sets out the funding received by the Deaf Education Network (now the education and training department of the Deaf Society) under SSP Training Market Tenders.

Qualification	Year	No. of Students	Amount Received (\$)
Certificate III in Auslan	2006	12	64,328.64
Certificate IV in Auslan	2006	17	74,599.40
Diploma of Auslan	2007	7	42,392.28
Certificate II in Auslan	2007	8	47,160.00
Certificate III in Auslan	2007	7	41,448.40
Certificate III in Auslan	2008	8	45,273.60
Certificate IV in Auslan	2008	7	41,448.40
Diploma of Auslan	2010	16	96,756.48
Certificate IV in Auslan	2010	16	88,519.68
Diploma of Auslan	2012	15	27,000.00
Certificate III in Auslan	2012	9	30,240.00
Certificate II in Auslan	2013	10	11,200.00
Certificate III in Auslan	2014	14	90,160.00
Certificate IV in Auslan	2014	16	108,000.00
Certificate II in Auslan	2014	9	40,320.00
Certificate II in Auslan	2014	9	40,320.00
			\$889,166.88

APPENDIX 2: SAMPLE OF UNFILLED BOOKINGS

A sample of data from bookings received by the Deaf Society of NSW across NSW and the ACT shows an existing underlying shortage. For the sample period of 20 October 2014 to 20 November 2014, a total of 79 interpreter booking requests were not able to be serviced. Brief descriptions of some of the bookings illustrate the effects of the interpreter shortage in the lives of individual deaf people:

- In the ACT – no interpreters provided for a mental health appointment. Had to be rescheduled to mid December to suit the interpreter’s availability. There are only 2 professional level interpreters in the ACT.
- In the Hunter region – an urgent department of housing appointment. Had to be rescheduled to 10 days later to first available interpreter.
- Sydney – a deafblind woman had no interpreters for her service provision meeting. Communicating to her that no interpreters are available is difficult without interpreters.
- In the Hunter region – an NDIS participant could not attend a meeting about her plan as no interpreters were available.
- Sydney – a family in crisis cannot have their DOCS appointment to receive an update on their children recently taken into care as no interpreters are available.
- Sydney – a family buried their father in silence as no interpreters could be provided.
- Sydney – a deaf person could not attend a job interview as no interpreters were available.
- Sydney – a deaf person was hospitalised with no interpreters to assist communicating important medical information. Numerous agencies were contacted and this was an outsourced booking.
- Sydney – a mental health review ordered by the courts could not be serviced without interpreters. Numerous agencies were contacted and this was an outsourced booking.

- Sydney – a case conference regarding the welfare and schooling of a child could not take place without an interpreter.
- On the Central Coast – an interview to prepare a report for court could not be conducted without a professional level interpreter.
- Sydney – a mental health review ordered by the courts could not be serviced without interpreters. Numerous agencies were contacted and this was an outsourced booking. An interpreter who is experienced in this setting was in court with another client on this day.
- Sydney – a court booking was un-serviced.
- In the Hunter region – a court case had no professional level interpreters and could not go ahead. Numerous agencies were contacted and this was an outsourced booking.
- Sydney – a deaf person was hospitalised with no interpreters to assist communicating important medical information. Numerous agencies were contacted and this was an outsourced booking.
- Sydney – a deaf person was hospitalised and prepared for surgery with no interpreters to assist communicating important medical information. Numerous agencies were contacted and this was an outsourced booking.
- On the South Coast – a deaf person could not attend a job interview as no interpreters were available.
- Sydney – a deaf person was hospitalised and prepared for / consented to surgery with no interpreters to assist communicating important medical information. Numerous agencies were contacted and this was an outsourced booking.
- Sydney – a deaf person had no access to see the mental health acute care team. Numerous agencies were contacted and this was an outsourced booking.
- Sydney – a subcommittee specialising in disability services had no representative of the deaf community as no interpreters could be provided. We had over 3 weeks notice for this booking (above our recommended 2 week notice period).
- Sydney – a caseworker could not have a meeting regarding concerns of the welfare of a child as the deaf family members had no interpreters present.
- Sydney – a psychiatrist appointment for a legal matter could not be conducted without an interpreter present.

APPENDIX 3: CURRICULUM OUTCOMES: CERTIFICATES IN AUSLAN AND DIPLOMA OF AUSLAN

The following summaries are extrapolated from the Auslan curriculum outcomes and evidence guides to illustrate the kinds of work that might be appropriate for graduates of each level of Auslan qualification from Certificate II in Auslan through to Diploma of Auslan in providing NDIS supports.

CERTIFICATE II IN AUSLAN

CURRICULUM SUMMARY

The qualification of Certificate II in Auslan means that the bearer of this qualification should have an introductory understanding and knowledge of the language, cultural and history of the Deaf community. Their language skills will be limited to giving and receiving simple information in Auslan in a number of contexts.

EMPLOYABILITY POST-GRADUATION

Students who have successfully completed Certificate II in Auslan have the skills to communicate with deaf Auslan users in everyday predictable situations where the content of the interaction is familiar to both people. For example, a graduate of Certificate II in Auslan would have the Auslan skills to provide the following support to deaf customers:

- Basic interactions in a retail setting
- Providing transport to a pre-arranged venue
- Working in front-of-house or reception roles where it is possible that deaf Auslan users may request:
 - o Directions to facilities in the building
 - o Simple transactions such as picking up a ticket
 - o Making appointments
 - o Checking access needs (e.g. that interpreters have been booked)
 - o Providing printed information such as timetables and programs
- Working in roles which involve the following interactions:
 - o Reporting a simple problem in the workplace
 - o Making (not interpreting) a simple message in Auslan, such as congratulating a colleague on an achievement
 - o Giving simple instructions such as telling people to leave the building in the event of an emergency
 - o Following simple instructions given in Auslan
 - o Explaining a simple familiar procedure in Auslan
 - o Engaging in simple exchanges on familiar topics
 - o Eliciting basic information through an Auslan conversation such as name and contact details.

Certificate II in Auslan graduates would not usually be expected to have the language skills to manage:

- Settings with new or unfamiliar content
- Situations which involve life-important information such as any information relating to health, finance, legal or personal issues
- Situations in which conflict may occur
- Situations which are highly emotional
- Discussions of a technical or specialised nature
- Discussions with deaf people who use non-standard varieties of Auslan, who have experienced a delay in language acquisition, or who have additional disabilities or communication needs such as deafblind people.
- Transfer of information between Auslan and English. A graduate of Certificate II in Auslan would at no time be expected to act in the role of an Auslan interpreter.

The following roles would be expected to meet these criteria:

- Retail assistant
- Customer service officer
- Driver for a disability support service
- Receptionist
- Front-of-house role at an event
- Volunteer in an emergency services organisation (where contact with deaf Auslan users is possible but not routine)
- Any other job role where it is possible that deaf Auslan users will access the service, but where detailed and life-important interaction is not required

CERTIFICATE III IN AUSLAN

CURRICULUM SUMMARY

The qualification of Certificate III in Auslan means that the bearer of this qualification should have an extensive understanding and knowledge of the language, cultural and history of the Deaf community. Their language skills will be limited to giving and receiving routine information in Auslan in a number of contexts.

EMPLOYABILITY POST-GRADUATION

Graduates who have successfully completed Certificate III in Auslan have the skills to communicate with deaf Auslan users in everyday situations where the content of the interaction is predictable.

- Intermediate interactions in a retail setting
- Working in front-of-house or reception roles where it is possible that deaf Auslan users may request:
 - o Information about products and services
 - o Discussing information such as timetables and programs
- Working in roles which involve the following interactions:
 - o Conversing 1:1 in Auslan and sharing an opinion
 - o Discussing incidents (eg, accident in the workplace)
 - o Sharing ideas from a colleague
 - o Active listening and understanding
 - o Explaining routine processes
 - o Engaging in routine exchanges on familiar topics
 - o Eliciting routine information through an Auslan conversation such as names, places, factual information

Certificate III in Auslan graduates would not usually be expected to have the language skills to manage:

- Settings with new or unfamiliar content
- Situations which involve life-important information such as any information relating to health, finance, legal or personal issues
- Situations in which conflict may occur
- Situations which are highly emotional
- Discussions of a technical or specialised nature
- Discussions with deaf people who use non-standard varieties of Auslan, who have experienced a delay in language acquisition, or who have additional disabilities or communication needs such as deafblind people.
- Transfer of information between Auslan and English. A graduate of Certificate III in Auslan would at no time be expected to act in the role of an Auslan interpreter.

The following roles would be expected to meet these criteria:

- Teacher aide where message transfer is not involved
- Childcare worker
- Child/youth resident care assistant
- Nurse (direct communication with patient, ie reading blood pressure, asking if they need anything or are experiencing any pain)
- Front-of-house role at a disability event
- Any other job role where there is a possibility that deaf Auslan users will access the service, but where detailed and life-important interaction is not required

CERTIFICATE IV IN AUSLAN

CURRICULUM SUMMARY

The qualification of Certificate IV in Auslan means that the bearer of this qualification should have an advanced understanding and knowledge of the language, cultural and history of the Deaf community. Their language skills will include the ability to give and receive complex information in Auslan in a number of contexts.

EMPLOYABILITY POST-GRADUATION

Graduates who have successfully completed Certificate IV in Auslan have the skills to communicate with deaf Auslan users

Graduates of Certificate IV in Auslan can be expected to undertake work roles which require them to:

- Conducting complex processes eg, giving and explaining instructions for the use of equipment
- Explaining and fielding enquiries related to technology (workplace technology, computer software)

Limitations:

- Graduates of Certificate IV in Auslan cannot undertake formal interpreting work. At this level, graduates have not reached a level of fluency which enables them to switch readily between two languages. Engaging in a direct dialogue with a single deaf Auslan user is the optimal situation for such graduates of this Certificate level.

Roles:

Certificate IV in Auslan qualifies a person to work in roles that have regular and detailed interaction with deaf Auslan users on a range of familiar topics. For example:

- Some professional roles where a deaf client chooses to interact with the professional and the deaf person wish to interact in Auslan directly without an interpreter. It is still advisable to book interpreters where there is critical and complex information or when the deaf or hearing person requests one.

DIPLOMA OF AUSLAN

CURRICULUM SUMMARY

The qualification of Diploma of Auslan means that the bearer of this qualification should have a formal understanding and knowledge of the language, cultural and history of the Deaf community. Their language skills will include the ability to give and receive a broad range of complex information in Auslan in a number of contexts.

EMPLOYABILITY POST-GRADUATION

The Auslan curriculum states that upon successful completion of the Diploma of Auslan, graduates have the opportunity to seek employment within a range of organisations providing services to the Deaf community as well as seek entry into further study for translating and interpreting.

Graduates of the Diploma of Auslan can be expected to undertake work roles that require them to:

- Give detailed information about services available, and options available to a deaf customer
- Handling complaints made by a deaf person about a service
- Explain and answer questions on complex procedures such as work roles
- Conduct HR procedures such as 1:1 interviews, discussions about grievance procedures, discussions of contract and award entitlements
- Have a detailed understanding of deaf culture and cultural practices and an ability to apply this knowledge with sensitivity and respect.
- Giving presentations in Auslan
- Making reports in Auslan about complex matters such as policies and procedures.

Limitations:

- Graduates of the Diploma of Auslan cannot undertake formal interpreting work. This is because the transfer of meaning from one language to another is a separate skill. Fluency in two languages does not guarantee skill in the accurate transfer of meaning between those languages. However, it is possible that graduates of the Diploma of Auslan may be able to facilitate communication in low-stakes settings where the content is straightforward, where there is ample opportunity for clarification, and where there is time to transfer meaning consecutively, rather than simultaneously.
- Graduates of the Diploma would not be expected to have the skills to handle highly sensitive or emotional situations without additional training or existing professional qualifications (e.g. experienced HR manager, counsellor, and mediator).

- Graduates of the Diploma of Auslan would not generally be considered suitable as Auslan translation consultants or presenters unless they have additional qualifications or experience e.g. they have native-like fluency or interpreting qualifications.

Roles:

The Diploma of Auslan qualifies a person to work in roles which have regular and detailed interaction with deaf clients on a range of familiar and unfamiliar topics. For example:

- Direct support worker for a deaf person receiving NDIS social support, (other applicable NDIS support) disability support services or employment support services, including where the deaf person has additional communication needs e.g. has an additional disability such as blindness/low vision or where the client is highly visually oriented.
- Teacher aide in a school setting supporting deaf students (where interpreting is not part of the job role).
- A manager who has Diploma of Auslan would not usually require an Auslan interpreter for interactions with their deaf staff, although an interpreter may be advisable if the information is dense and complex or when it is easier for everyone to use their first language.

Some professional roles where a deaf client chooses to interact with the professional in Auslan directly without an interpreter. It is still advisable to book interpreters where there is critical and complex information or when the deaf or hearing person requests one.

APPENDIX 4: SURVEY METHOD

Respondents to the survey were provided with two lists of hypothetical interpreted settings. For the first list, deaf/deafblind/Ushers/hard of hearing respondents were asked: "Please indicate in which scenarios you feel you must have or prefer to have an interpreter or don't need an interpreter." Hearing respondents were asked "We would like to know what you think about when, in your experience, communication goes well without an interpreter, when it may be risky, and when interpreters are essential. Please choose one answer for each situation."

The second list of scenarios contained a similar list, with the addition of several more lower-risk social/community/everyday settings, and asked deaf/deafblind/Ushers/hard of hearing respondents: "Please indicate in which scenarios you would accept people who can sign but are not qualified interpreters eg, family, friends or advanced Auslan student." Hearing respondents were asked: "Please indicate which scenarios in which you think communication could/would be facilitated safely and effectively by anyone who has the equivalence of Certificate IV in Auslan or above but isn't a qualified Auslan interpreter."

Data was analysed according to groups with the following profiles:

- Deaf/deafblind/Ushers respondents with Auslan or tactile communication as their preferred means of communication (62 respondents) – these are the likely to be the greatest users of Auslan interpreting services
- Those with Certificate IV in Auslan or Diploma of Auslan as their highest level of Auslan qualification (16 respondents) – these represent people with a level of Auslan language skill, and who might be considered able to do some work requiring Auslan skills with deaf NDIS participants
- Qualified interpreters and paraprofessional interpreters (19 respondents) – these represent practitioners with experience in the field of interpreting

Some comparison was also made with hard of hearing people and people with Diploma of Interpreting but no interpreter credentials. However, these groups were too small to yield very reliable data and were only used for illustrative purposes.

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