



28 September 2023

Multicultural Framework Review Panel

Submitted via website: <https://multiculturalframeworkreview.com.au/en>

Dear Multicultural Framework Review Panel,

I am writing to share our support for the Multicultural Framework Review and provide NAATI's response. The review comes at a significant time in Australia's history, with increased public awareness of our diverse community's needs driven by the COVID-19 pandemic and huge economic and social changes occurring throughout the country. NAATI commends the government for its efforts in reviewing the policy and institutional settings that support multicultural Australia.

About NAATI

NAATI is the national standards and certifying authority for translators and interpreters in Australia. It is the only organisation to issue certification to practitioners who wish to work in this profession in Australia. NAATI-certified practitioners are highly skilled professionals that have demonstrated they have the skills needed to practice as a translator or interpreter in Australia.

NAATI's vision is for a connected community without language barriers. NAATI is a national not-for-profit organisation, owned by the nine governments of Australia, with a 50-year history of working with over 190 language communities across Australia.

You can learn more about NAATI's Certification System on our website here:

<https://www.naati.com.au/certification/>

Response to the Review

NAATI recognises that language is a significant element of connection and social cohesion for all. Language rights are also an integral part of human rights. The UN estimates that 40% of the world's population have no access to education in a language that they speak or understand, which has negative multiplier effects on attaining many of the Sustainable Development Goals.¹

Being able to communicate and have our voice heard is an important part of all citizen's lives, whether we speak Arabic, S'gaw Karen, Dari, English, Mandarin, or any other language. People living in Australia speak over 400 languages, with nearly 5% of the population speaking English not well or not at all. Translators and interpreters are the key that enable us all to communicate and provide an essential service to our community to ensure people are able to participate effectively, access services or support, and maintain livelihoods in Australia.

¹ [Linguistic Diversity: An Imperative for the United Nations | United Nations](#)

Surprisingly to some, many people who require the services of translators and interpreters have long settled in Australia – it is not just newly arrived migrants who require translators and interpreters to communicate effectively.

As you consider the review, it is also important to be aware that translators and interpreters not only support people with low English proficiency. They support everyone in the conversation – English-speakers included – to understand each other and be understood.

There is a common misconception that someone who is bilingual can be a translator or interpreter by virtue of their knowledge of two languages. However, this is a skilled profession where practitioners require the ability to instantly comprehend and express contextualised meaning from one language into another. They are required to translate between parties as completely and accurately as possible, and avoid undue omissions, additions, distortions, or other activities that may interfere with the two parties understanding of each other.

NAATI Certification is the industry standard for working as a translator or interpreter in Australia and a critical risk management and quality assurance system. It gives consumers confidence that the professional they are relying on have the appropriate skillset and qualifications for the job. Whilst there can be no absolute guarantee, one can be assured that a translator or interpreter holding a NAATI credential:

- has undergone formal training, and likely to hold a formal qualification;
- has proven language skills;
- has demonstrated intercultural and ethical competency;
- has had their knowledge and skills independently assessed; and
- engages in ongoing professional development.

Challenges in the translating and interpreting profession

Ensuring the availability of appropriately certified translators and interpreters (T&I) is a fundamental part of Australia's multicultural fabric; however, the profession faces many challenges to its sustainability into the future.

Some of these issues include:

- **Lack of industry regulation.** Whilst NAATI has a role in setting standards for individual practitioners, it is limited to policy authority (*Multicultural Language Service Guidelines for Australian Government Agencies*) and there is no statutory requirement to engage NAATI certified professionals. Further, there is no system of regulation for language service providers (LSP's) who control most of the activity, including decisions on allocating assignments. LSP's are expected to follow the Guidelines but there is little or no compliance monitoring and no sanction for non-compliance.

There are other industry developed guidelines, including the Recommended *National Standards for Working with Interpreters in Courts and Tribunals*, and *Guide for Clinicians Working with Interpreters in Healthcare settings*, which suffer from lack of implementation.

- **Availability of adequate translation and interpreting training.** This is particularly a challenge in languages of new and emerging communities, and those languages with a low number of existing certified practitioners (who can then go on to train others).
 - This is also a particular challenge for people living in regional, rural, or remote areas of Australia, with fewer training opportunities available.
- **Low pay rates and inadequate employment conditions.** We regularly hear about the ‘race to the bottom’ of pay rates for professional translators and interpreters, and the flow-on effect this has for people working in the profession. This is exacerbated by the casualisation and fragmentation of the profession over many years.
- **Difficulty retaining existing practitioners in the profession.** Associated with pay rates and employment conditions, it is challenging to attract people into the profession and then to retain them into the future. The demographic profile of the profession indicates an ageing workforce, and the rate of attrition exceeds the rate of recruitment.
- **Low levels of awareness among the community.** Many people in Australia do not understand the importance of properly trained and certified translators and interpreters, or the role that they play. Many people also do not understand that they have the right to ask for an interpreter or translated material, or how to do this.
- **Practitioner availability in all languages.** This issue is linked with the challenges already listed, as well as NAATI’s capacity to provide testing or credentials across the full range of languages spoken in Australia. Many communities struggle to find a translator or interpreter in their language. This represents further challenges for these communities, as they will rely on family and friends to assist them in communicating.

Suggestions for Consideration

While many of these issues are complex and inter-related, there are several opportunities for the government to intervene and support the profession in its role to support the Australian community.

- **Procurement policies.** Given that government, both State and federal, are the largest consumers, and therefore funders, of translating and interpreting services, they have significant leverage and capacity to influence. By harnessing this purchasing power, governments can ensure clauses are embedded into procurement policies and in turn, contracts with LSP’s, to support outcomes associated with sustainability.

In the absence of strong industrial instruments to support the workforce, procurement contracts could be used as a mechanism to support other Australian Government initiatives including for example, the Secure Jobs, Better Pay Bill.

- **Improving regulation and compliance.** Of course, to achieve the desired outcomes, strengthened policy need to be supported by a compliance framework. In addition to improving contract compliance, there is significant opportunity to improve the take up and compliance with existing guidelines. It might also be worth considering a form of accreditation for LSP’s who implement sustainability measures and relevant guidelines.

- **Awareness raising among community:** The need for, role of, and access to translators (for written material) appears to be understood in the community but awareness among the community about the role and availability of interpreters appears to be lower. In general, NAATI does not believe our multicultural community is aware that they have a right to request an interpreter, or of the risks of working with someone who is not a credentialed interpreter. Low levels of awareness then feed into other issues such as low pay rates, low availability of interpreters in certain languages, and lack of training opportunities. By raising awareness in a “bottom-up” approach, educating communities directly, we believe this will support the sustainability of the sector moving forward, as well as supporting individuals with access to this vital service.
- **Support for training opportunities.** Given the issues previously identified regarding lack of security and poor remuneration, it is difficult to attract people into the profession as they realise the limited return on their investment in training to get a qualification. Provision of subsidised training and professional development would support the sustainability effort.
- **Targeted support to new and emerging communities, including refugee communities.** Through targeted support to newly arrived refugees and humanitarian entrants, NAATI considers that that refugee and migrant populations in Australia will benefit through enhanced access to services and support by way of interpreters, which will result in better settlement and integration outcomes.

Thank you again for the opportunity to contribute. NAATI looks forward to the further discussion on improving the sustainability of the profession, and in turn, supporting Australia’s multicultural policy framework. Further, NAATI welcomes the opportunity to closely in partnership with government and other industry stakeholders in implementing any of the panel’s recommendation that involve the language services sector.

Kind regards,



Mr Mark Painting
CEO