



Australian  
Industry and  
Skills Committee

# DIPLOMA AND ADVANCED DIPLOMA OF TRANSLATING AND INTERPRETING (LOTE-ENGLISH)

Case for Change

Name of allocated IRC: Public Sector IRC

Name of the SSO: SkillsIQ

## 1. Administrative information

For a list of the products proposed to be reviewed as part of this project, please see **Attachment A**.

Name of IRC(s): Public Sector

Name of SSO: SkillsIQ

### 1.1 Name and code of Training Package examined to determine change is required

The following four qualifications (and 50 associated Units of Competency), are proposed to be reviewed and updated:

- PSP50816 Diploma of Translating
- PSP60816 Advanced Diploma of Translating
- PSP50916 Diploma of Interpreting (LOTE-English)
- PSP60916 Advanced Diploma of Interpretig (LOTE-English)

In addition, it is recommended that:

- 110 SITXLAN### Units of Competency are removed from the qualifications; and
- Two new skill sets are established:

Interpreting	Translating
PSPTIS001 Apply codes and standards to ethical practice	PSPTIS001 Apply codes and standards to ethical practice
PSPTIS002 Build glossaries for translating and interpreting assignments	PSPTIS002 Build glossaries for translating and interpreting assignments
PSPTIS003 Prepare to translate and interpret	PSPTIS003 Prepare to translate and interpret
PSPTIS042 Manage discourse in general settings	PSPTIS064 Read and analyse special purpose English texts to be translated

Please refer to **Attachment A** for a full list of Training Package Products.

## 2. The Case for Change

For information on the job roles to be supported through the proposed qualifications updates, enrolments data, completion rates, and the number of RTOs delivering these qualifications please see **Attachment B**.

### 2.1 Rationale for change

**The VET sector is essential for supplying potential translating and interpreting professionals to the workforce.** VET graduates are eligible to attempt the National Accreditation Authority for Translators and Interpreters (NAATI) Certification test and gain accreditation to enter the workforce. NAATI is the credentialing authority for translators and interpreters in Australia and is responsible for the setting and maintaining of standards for the industry through a national certification system.

The Diploma and Advanced Diploma in Translating and Interpreting are therefore fundamental qualifications used to ensure professionals are equipped with the right skills and knowledge to gain accreditation.

A number of key changes regarding workforce demand and the operating environment has meant that the **training package products are no longer fit-for-purpose and need to be urgently updated**. The main changes which have triggered this request are:

- **Filling the current training gap in interpreting and translating to meet NAATI's minimum training requirement.**

NAATI has a compulsory training requirement for all candidates who wish to obtain credentials in interpreting and translating. That minimum requirement is the units which comprise the two skillsets proposed above. These units are currently being delivered in several states but are often not subsidised by state governments since they are not a formal skill set. This particularly disadvantages students from new and emerging communities where the demand for interpreters is greatest and where the cost of non subsidised study is often prohibitive. A formal skill set would enable subsidised delivery and contribute to meeting the demand for interpreters and translators in these languages. (see below for details about interpreter and translator demand)

**Two formalised skill sets are proposed to fill this gap (see section 1.1 for a list of the skill sets).**

- **Shortage of qualified trainers for low volume languages**

Demand for translators and interpreters in low volume languages, including those spoken by the Culturally and Linguistically Diverse (CaLD) community and more recent humanitarian refugees, has been increasing. The escalation of demand has been further triggered by the COVID-19 pandemic. The extent to which it is disproportionately impacting CALD communities has meant the need to ensure access to reliable, accurate and targeted information for these communities is paramount. The recently reported outcomes of the *Royal Commission in Aged Care Quality and Safety* (2021) and the *Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability* (currently underway) have also emphasised the importance of providing standards and quality translating and interpreting services to those with limited English proficiency. Despite these trends, education providers are having trouble recruiting training staff to teach the Diploma and Advanced Diploma LOTE (language other than English) specific units in interpreting or translating.

**Difficulties in recruitment mainly lie in the short term nature of casualised employment opportunities.** For example, many teaching positions are offered on a casual (hourly) basis and most languages are not offered continuously (i.e. one semester only, at a few hours per week). Therefore, potential trainers are not willing to complete a Certificate IV in Training and Assessment (TAE40116) for the potential limited remuneration. The cost to obtain this qualification is not considered reasonable therefore a more flexible approach to the unit delivery is necessary.

Currently, a number of units in the Diploma and Advanced Diploma of both Interpreting and Translating have units which are LOTE specific, for example: PSPTIS043 - Use routine subject matter terminology in interpreting (LOTE-English). Being language specific means that they have to be assessed by a qualified TAE lecturer in the corresponding LOTE (e.g. Burmese or Swahili or Kirundi). This means that educational institutions have to source a person who is a Burmese, Swahili or Kirundi interpreter or translator who also has a Certificate IV in Training and Assessment (TAE40116) to teach and assess this unit for a few hours per week for the time that this qualification is offered for that language. Since there are no qualified people in those languages (both in interpreting/translating or teaching) students who want to study the full qualification in those and many other new and emerging languages cannot do so as the institutions can offer those units only in a very limited number of languages, usually languages of wide diffusion where the demand for interpreters/translators is low.

Additionally, due to the need to offer these courses to small groups of students in each language, there is a push to be able to deliver these qualifications in a multilingual setting with most of the units delivered in English by fully TAE qualified interpreters/translators with language specialists to support the language specific component employed as tutors. These tutors would be qualified interpreters/translators who would not need to meet the full TAE requirements. On completion of the qualification, interpreters and translators need to sit for certification tests with NAATI which is what gives them the credential to practice.

The skill set proposed above is a short-cut entry to the profession, but only for those who already have many of the skills. In the case of many aspiring interpreters and translators, they need the more comprehensive training of a full qualification as is demonstrated by the high failure rate at the NAATI test of students who have only completed the short skill set. Therefore, to provide the opportunity to many people from new and emerging communities to be able to qualify as interpreters and translators after completing the full qualification:

**It is proposed to remove all LOTE/English references in the unit titles in all four qualifications for interpreting and translating.**

- **Current requirements of training package products are exclusionary of Deaf interpreter and Auslan/English interpreter students**

Deaf interpreters are currently at a disadvantage when undertaking a Diploma or Advanced Diploma in Interpreting due to the English language training requirements. Deaf Interpreting students do not communicate between English and another spoken language. Instead, they work between Auslan and non-conventional sign language or another foreign sign language. The Diploma and Advanced Diploma of Interpreting are issued as English-LOTE, and the foundation skills are defined for English oral skills, therefore Deaf Interpreter students are at risk of not meeting the English language requirements of their qualification. Currently students issued with a qualification are at risk of having their qualification withdrawn if auditors deem the English language requirements as not being met.

The current wording used in the training package products requires students to have oral skills in the LOTE. This cannot be applied to Deaf Interpreter students nor to Auslan/English Interpreter students as Auslan is a sign language with no 'oral skills'. This is only one example of wording that excludes these students.

**Wording throughout the training package products needs to be urgently reviewed to address such exclusionary criteria.**

Quality translation and interpreting services support the efficient and effective provision of a wide range of public services, including healthcare, education and legal services. Implementing best practice helps ensure that public funds are

spent as effectively as possible in these areas when interacting with non-English-speaking members of our society. The services of focus also contribute to the integration of non-English-speaking communities and promote their full economic participation.

If the training package products outlined above are not reviewed and updated promptly, there is an immediate risk of ill-supporting CaLD communities and individuals speaking low volume languages. The shortage of interpreters and translators will continue due to the lack of training staff and therefore more flexible training options such as non language specific units and skill sets are urgently required to encourage key professionals to obtain skills and knowledge to meet the workforce shortfalls.

Also, Deaf interpreter and Auslan/English interpreter students will continue to be disadvantaged due to the oral communication and English skill requirements of the interpreting Qualifications, both at Diploma and Advanced Diploma level. The wording may be considered discriminatory against these students and therefore it needs to be changed as a matter of urgency.

Please refer to Attachment B for enrolment and completion data regarding the training package products of focus. In 2019, just over 2,800 enrolments were registered across the qualifications, however, enrolments have been decreasing over the years.

## 2.2 Evidence for change

As outlined above, there are some pressing issues for the Languages Services sector regarding the shortage of qualified training staff for low volume languages, and the subsequent impact on supply to the workforce.

The US Bureau of Labor Statistics (US BLS) estimate the international language services market to be worth \$US55 billion in 2021 and anticipate an 18% jobs growth in the industry between 2016 and 2026 compared to an average 7% growth in all (US BLS, 2018). Highly qualified Australian service providers are already playing an important international role in this market, but there is significant room for expansion.

The latest ABS Census data shows that there were approximately 4,000 Interpreters and 1,500 Translators across Australia in 2016.<sup>1</sup> More recent sector-based data shows that as at 30 June 2021, there were 13,178 individual practitioners across Australia, holding 17,950 NAATI credentials in 185 languages. NAATI issued 986 new credentials in the 2020/21 financial year.<sup>2</sup>

Demand for interpreting and translating services, in particular those related to telehealth and government support services have increased significantly since the COVID-19 pandemic hit Australia. For example, in May 2020 Translating and Interpreting Service (TIS National), an interpreting service provided by the Australian Government Department of Home Affairs, delivered 111,000 immediate telephone interpreting services, representing a 13.5% increase from May 2019.<sup>3</sup> Approximately 15,800 calls were connected in May 2020 to the Australian Tax Office (ATO) compared to 5,300 in May 2019.

Translating and interpreting services are now critical components to supporting vulnerable communities access the right support when impacted by the COVID-19 pandemic. Workforce forecasts generated by the Australian Government show the number of Social Professionals (which include Translators and Interpreters) is expected to increase over the next five years by 12% to reach 19,700 by November 2025.<sup>4</sup> Future demand is therefore expected to be strong. Stakeholder feedback, including that from NAATI, also confirm that future demand for interpreting and translating services (for low volume languages) is expected to continue therefore it is essential that there are sufficient interpreting and translating professionals to support individuals.

## 2.3 Consideration of existing products

This Case for Change proposes the addition of two new skill sets. The skill sets are essential to facilitate access to training to potential translating and interpreter professionals where there is currently strong demand for. There are no existing training products that are similar in skill and knowledge composition.

## 2.4 Approach to streamlining and rationalisation of the training products being reviewed

<sup>1</sup> Australian Bureau of Statistics (ABS) 2016 Census of Population and Housing. Occupation ANZSCO 272412 Interpreter (n=3,986), ANZSCO 272413 Translator (n=1,536). Data supplied by the ABS to SkillsIQ 9 August 2021.

<sup>2</sup> Data supplied by the National Accreditation Authority for Translators and Interpreters Ltd (NAATI).

<sup>3</sup> Australian Government Department of Home Affairs, Translating and Interpreting Service (TIS National). Talking TIS Winter 2020 newsletter. Available at: <https://www.tisnational.gov.au/en/About-TIS-National/Materials-to-help-you-access-an-interpreter/Talking-TIS-newsletter> [Accessed 9 August 2021]

<sup>4</sup> Australian Government Labour Market Information Portal. 2020 Employment Projections – for the five years to November 2025. Occupation projections. Available at: <https://lmip.gov.au/default.aspx?LMIP/GainInsights/EmploymentProjections> [Accessed 9 August 2021]

This review will result in the removal of 110 SITXLAN### Units of Competency which were imported into the qualifications. These units were deleted from the Tourism, Travel and Hospitality Training Package (SIT) in 2016 and need to be removed as they do not provide the requisite skills and knowledge for translators and interpreters who should have competency in language prior to commencing training as a translator or interpreter.

### 3. Stakeholder consultation

#### 3.1 Stakeholder consultation undertaken in the development of Case for Change

*For a full list of industry-specific stakeholders that actively participated in the stakeholder consultation process undertaken to develop the Case for Change, please see **Attachment C**.*

A comprehensive and lengthy consultation to investigate demand and supply issues regarding the Languages Services sector and specifically translating and interpreting services was undertaken prior to the development of this Case for Change. Issues regarding the suitability of the training package products of focus were first raised by NAATI in mid-July 2019 and supported by the extensive network of institutions they regularly work with to deliver training. Since then, a number of forums were used to examine the issues raised regarding the training package products and sector demand, and determine support. Key consultation activities conducted included:

- Several face-to-face and virtual meeting discussions with members representing key stakeholders from the translating and interpreting sector, including several of the 19 VET institutions that hold NAATI Endorsed Qualification status
- NAATI convened a meeting of (translating and interpreting) senior policy officials from all 9 jurisdictions on 9 June 2021. There was universal support for the proposal.
- Collection of feedback via telephone and email correspondence from networks which are involved in translating and interpreting services

Whilst a large portion of the consultation was conducted prior to the COVID-19 pandemic, it is noted that feedback received since the beginning of COVID-19 in Australia (i.e. March 2020) has further confirmed that the training package products are not suitable in their current format to support the increasing demand for translating and interpreting services, especially for low volume languages. The pandemic in fact has escalated the need to provide more flexible training options to ensure the high demand for translating and interpreting professionals for low volume languages is met and communities impacted by COVID-19 have access to clear and comprehensive information of support.

#### 3.2 Evidence of Industry Support

*For a list of the issues raised by stakeholders during consultation and the IRC's response to these, please see **Attachment D**.*

All feedback provided by stakeholders for this draft version of the Case for Change has been summarised in earlier sections and used to determine the key recommendations put forward regarding the update, deletion and addition of units of competency in four qualifications of focus. Any issues raised during the draft Case for Change consultation period will be noted in Attachment D of the final version submitted.

#### 3.3 Proposed stakeholder consultation strategy for project

*Note: For a full list of industry-specific stakeholders who are planned to be contacted to participate in the stakeholder consultation process undertaken for this project, please see **Attachment E**.*

An extensive multi-channel consultation plan has been established to gather views and feedback from a range of stakeholders. These include **interviews, workshops, webinars** and **SkillsIQ's Online Feedback Forum**. The Feedback Forum is a tool designed to capture stakeholder feedback on draft Training Package Products. It also provides an opportunity for stakeholders to view feedback left by others. All proposed changes to the qualifications, including content changes to specific Units of Competency will be available on the Feedback Forum.

Whilst the preferred method for conducting consultation activities such as interviews and workshops is face-to-face, the current climate regarding COVID-19 restrictions and conditions means telephone or zoom discussions will be utilised until such restrictions ease.

The consultation will be promoted via various channels including:

- Direct email to SkillsIQ's national network (of over 10,000 contacts), to maximise reach of the consultation.
- Members of the Public Sector IRC will play an active role in promoting the consultation across their wider networks to ensure key stakeholders who have some involvement or knowledge of translating and interpreting services are aware or the review and encouraged to participate.
- NAATI, the national certifying authority in the sector, will liaise directly with their networks which are located all across Australia.
- Consultation information will be circulated to NAATI's wider networks in regional and rural areas across Australia to ensure their feedback and experiences are incorporated in the consultation.

In addition to this, it is proposed that a Technical Advisory Committee (TAC) be formed, comprising professionals and subject matter experts in the field of translating and/or interpreting to provide guidance and recommendations to the IRC on development of Draft 1 of the updated training package products and review of feedback from consultation throughout the project.

## 4. Licencing or regulatory linkages

The National Accreditation Authority for Translators and Interpreters (NAATI) is the credentialing authority for translators and interpreters in Australia and is responsible for the settling and maintaining of standards for the industry through a national certification system (i.e. NAATI Certification test). NAATI have established mandatory minimum training requirements for all potential translating and interpreting professionals and therefore depend on the VET sector to supply cohorts of professionals eligible to attempt the NAATI Certification test. The qualifications recommended for review are critical components of the wider NAATI certification process and NAATI strongly endorses this review and update.

Australia, through the national standards body, Standards Australia, is a participant in the International Organisation for Standardisation (ISO) framework for developing and promoting international standards for the translating and interpreting profession through participation on the relevant committee ISO/TC 37/SC 5- Translating, Interpreting and Related Technology. A robust, flexible and fit for purpose VET training package is essential in supporting Australia's contribution to this work as well as ensuring there is an adequate supply of professional practitioners to support Australia's diverse community.

## 5. Project implementation

### 5.1 Prioritisation category

It is proposed that this review is progressed as a routine project. The pandemic has resulted in a significant increase in demand for translating and interpreting services for CaLD communities and individuals with low volume languages, especially for telehealth and government services therefore it is essential that the qualifications are updated promptly.

The AISC's IRC Prioritisation Framework Report confirms that both the Advanced Diploma in Translating and the Advanced Diploma of Interpreting (LOTE-English) meets usage and needs requirements, and should undergo a routine update. The Diploma of Interpreting (LOTE-English) meets usage and needs requirements and at least 3 importance benchmarks and should be fast tracked for update and the Diploma of Translating should be monitored. Given the interrelationships of all four qualifications, a routine update is proposed in this Case for Change.

### 5.2 Project milestones

The anticipated timeframe for the project is 11 months. Key activities will be carried out according to the schedule below. Please note this schedule is based on Case for Change approval at the November 2021 AISC meeting.

Activity	Proposed Timing
Review and approval of Case for Change by AISC	12 November 2021
Activity order issued by DESE	December 2021
Convene TAC and host initial Draft 1 development meeting	December 2021
Develop Draft 1 training package products	January – February 2022
Industry consultation on Draft 1	March 2022
Develop Draft 2 training package products based on Draft 1 consultation feedback	April - May 2022
Validate Draft 2 training package products	June 2022
Develop final draft Case for Endorsement and Companion Volume	July - August 2022
External Quality Assurance	September 2022
STA Consultation	September 2022
Submission of final Case for Endorsement to AISC	October 2022

### 5.3 Delivery or implementation issues

No issues or sensitivities have been raised to date. Any issues stated during the draft Case for Change consultation period will be included in the final version.

## 6. Implementing the Skills Minister's Priority reforms for Training Packages (2015 and October 2020)

The recommended review and potential outcomes of the project will address the priorities below in the following way:

- Ensure that more information about industry's expectations of training delivery is available to training providers to improve their delivery and to consumers to enable more informed course choices

National consultation processes involving national workshops and engagement with industry will ensure that the final Units of Competency and training requirements reflect employer, training provider and translator and interpreter student needs. It is expected that the Diploma and Advanced Diploma will be updated to allow these qualifications to be taught in non language specific classes and that two key skill sets will be established to enable aspiring translators and interpreters to access more affordable training, both measures supporting the increase of trained interpreters and translators to meet the current shortfall in workforce supply.

- Ensure the training system better supports individuals to move more easily between related occupations

Translators and Interpreters are equipped to apply their skills and knowledge across an array of industries and sectors including Government, Education, Health, Tourism and Hospitality, and Business to name a few. The work settings are endless therefore the proposed changes will ensure individuals can access training which is current, relevant, and which can be applied in different industry contexts. The potential outcomes of this project will support the sector to meet demand for translating and interpreting services in low volume languages which is increasing significantly.

- Improve the efficiency of the training system by creating units that can be owned and used by multiple industry sectors

Translators and interpreters work across multiple industries to deliver their core services and so there will be opportunities for the Units of Competency in the qualifications to be applied cross-sectorally.

- Foster greater recognition of skill sets and work with industry to support their implementation

The project's recommendations include establishing two new Skill Sets in order to meet a current gap in training for translators and interpreters of low volume languages. The Skill Sets will be consulted upon to validate their suitability and relevance for the sector.

This Case for Change was agreed to by the Public Sector IRC

Name of Chair

Guy Valentine

Signature of Chair

Date

## Attachment A: Training Package components to change

SkillsIQ

Contact details: Melinda Brown

Date submitted: [TBC after draft consultation period]

Project number	Project Name	Qualification/ Unit / Skillset	Code	Title	Details of last review (endorsement date, nature of this update transition, review, establishment)	Change Required
1	Translating and Interpreting	Qualification	PSP50816	Diploma of Translating	6 March 2016. PSP unit codes and imported units updated. Units required to complete qualification increased to 12. Core units updated. Elective unit list increased and groups added.	Update
1	Translating and Interpreting	Qualification	PSP60816	Advanced Diploma of Translating	6 March 2016. PSP unit codes and imported units updated. Units required to complete qualification increased to 13. Core unit requirement decreased and units updated. Elective unit list increased and groups added.	Update
1	Translating and Interpreting	Qualification	PSP50916	Diploma of Interpreting (LOTE-English)	6 March 2016. PSP unit codes and imported units updated. Units required to complete qualification increased to 12. Core unit requirements increased and units updated. Elective unit list increased and groups added.	Update
1	Translating and Interpreting	Qualification	PSP60916	Advanced Diploma of Interpretig (LOTE-English)	6 March 2016. PSP unit codes and imported units updated. Units required to complete qualification increased to 15. Core units updated. Elective unit list increased and groups added.	Update

## Attachment B: Job role, enrolment information, the number of RTOs currently delivering these qualifications

Please set out the job roles to be supported through the updated qualifications, enrolment data over the past three years in which data is available for each qualification, completion rates for each qualification, and the number of RTOs delivering these qualifications.

Job role	Qualification to be updated to support the job role	Enrolment data* (for the past three years)			Completion rates* (for the past three years)			Number of RTOs delivering** (for the past three years)		
Translators	PSP50816 Diploma of Translating	2017	2018	2019	2017	2018	2019 (preliminary)	2018	2019	2021
		0	0	19	-	-	-	5	5	5
Translators	PSP60816 Advanced Diploma of Translating	2017	2018	2019	2017	2018	2019 (preliminary)	2018	2019	2021
		6,062	4,485	1,459	1,583	3,354	898	23	23	17
Interpreters	PSP50916 Diploma of Interpreting (LOTE-English)	2017	2018	2019	2017	2018	2019 (preliminary)	2018	2019	2021
		3,926	3,512	1,110	1,123	2,476	623	27	30	22
Interpreters	PSP60916 Advanced Diploma of Interpreting (LOTE-English)	2017	2018	2019	2017	2018	2019 (preliminary)	2018	2019	2021
		187	294	264	44	142	141	4	5	4

**Source:** \*NCVER DataBuilder TVA Enrolments & TVA Completions - Total National 2017-2019 [Accessed August 2021]

\*\* 2018 and 2019 Public Sector IRC Industry Skills Forecast. 2021 figures are based directly from training.gov.au accessed August 2021. Represents RTOs with qualifications on scope.

**Note:**

1. From 2018 onwards, Registered Training Organisations (RTOs) are required to submit enrolment and completion data for all qualifications to NCVER. Thus 2018 and 2019 represent more complete sets of data, compared to previous years where data may underrepresent the true counts of enrolments and completions for a qualification.

2. Public RTO and private RTO data is included in the data.

## Attachment C: List of stakeholders that actively participated in the consultation process of the Case for Change

To be completed following consultation for the final version of the Case for Change

[illegible]

## Attachment D: Issues Raised by Stakeholders during consultation on the development of the Case for Change

To be completed following consultation for the final version of the Case for Change

Stakeholder Type	Issues Raised	IRC's Response to Issues Raised
Industry Reference Committee (IRC) Representatives		
Peak Industry Bodies		
Employers (Non-IRC)		
Regulators		
Registered Training Organisations (RTOs)		
Training Boards/Other		
State and Territory Training Authorities (STAs)		
Unions		
<i>Please add other categories as appropriate</i>		

## Attachment E: List of stakeholders to be contacted as part of the development of the Case for Endorsement

To be completed following consultation for the final version of the Case for Change

[illegible]