



Australian Sign Language  
Interpreters' Association, Inc.

Australian Competition & Consumer Commission  
GPO Box 520  
Melbourne, Vic 3001  
By email to [adjudication@accc.gov.au](mailto:adjudication@accc.gov.au)

7 February 2014

Dear Sir/Madam

**Re: Association of Professional Engineers, Scientists and Managers Australia  
Application for Authorisation A91402**

We write on behalf of the Australian Sign Language Interpreters Association Inc. (ASLIA) with regard to your letter dated 8 January 2014. ASLIA supports the application by the Association of Professional Engineers, Scientists and Managers Australia (APESMA, now known as Professionals Australia) to seek authority to represent translating and interpreting (T&I) practitioners.

ASLIA is the national professional association supporting the interests and development needs of Australian Sign Language (Auslan)/English interpreters across the country. As a member-led incorporated association, our administration operates in a voluntary capacity. Our work is supported by a network of state branches, currently existing in New South Wales, Queensland, South Australia, Tasmania and Victoria. ASLIA membership currently stands at over 330 members, and extends to all states and territories that do not currently have a functioning branch. ASLIA is an affiliate member of the World Association of Sign Language Interpreters (WASLI). In addition to supporting our members, we strive to increase access to equitable opportunities for our client base, who are members of the

Australian Deaf community (namely those who use Auslan as their first or preferred language of communication and instruction).

We work closely with our spoken language T&I association counterpart, the Australian Institute of Interpreters and Translators (AUSIT), as well as the national credentialing entity, the National Accreditation Authority of Translators and Interpreters (NAATI). Since early 2012, we have also enjoyed an increasingly close working relationship with APESMA as their interest in supporting our industry has developed, and we are keen for this relationship to continue to grow. In order for this to be effective, it is essential that not be constrained in their capacity to represent the breadth of practitioners in the industry, particularly those that operate as contractors and/or small businesses.

There is a difference in the client base between spoken language interpreters and signed language interpreters, in that Deaf people are less likely and less able to develop a preference for spoken English. In accordance with the position of Deaf Australia, ASLIA agrees that Deaf people are members of a cultural and linguistic minority (the capitalisation of the word 'deaf' describes this cohort, as opposed to those whose deafness is either treatable or is able to be sufficiently augmented by hearing technologies so to enable seamless functioning in an aural/oral world, and is guided by both necessity and personal choice). Our clients are typically 'clients for life', rather than transient or temporary users of T&I professionals to access information and services. Additionally, our clients are often the subjects of specialist education systems which frequently do not offer parity with their 'hearing' student peers.

The T&I industry at large has experienced a considerable lack of growth over the past two decades in terms of remunerative and non-remunerative incentives for practitioners to extend and develop their skills with the aim of providing professional levels of service to those who do not or cannot access the English language. The majority of T&I practitioners must operate as casual employees and sub-contractors of a number of agencies who broker individual assignments between themselves and a wide range of booking clients, both in the public and non-public sectors. For

Auslan/English interpreters, little opportunity exists for employment in private sector organisations. A small minority of Auslan/English interpreters are able to access permanent, full-time employment in any sector. As is true of many casualised industries, seasonal work is also a harsh reality. For the vast majority, the period between mid-December through to late-February is one where little casual work is available. Other quiet times of the year are also commonly experienced. As evidenced by claims made within APESMA's application for authority, a large number of interpreters eke out an annual remuneration which is close to or below the poverty line or, at best, is considerably lower than the national average wage.

Irrespective of the language pairs that interpreters work between, the process of interpretation is highly complex and extremely technical. This is not appropriately recognised by the current qualifications system in Australia, whereby individuals are deemed 'ready for work' (albeit at an entry level) after completing a one-year part-time Diploma of Interpreting (which is also sparsely offered around the country). A number of employers, for example TAFE institutes and other education providers do not differentially remunerate interpreters who have different levels of NAATI accreditation. This is one example of a lack of financial incentive for individuals to enhance and develop their skills beyond the basic level of training. APESMA has outlined in their application a significant number of other examples, including the range of multi-language agencies who have been successful in securing government contracts to provide interpreting services, and who are now striving to undercut both the hourly rates and working conditions of individual service providers, whilst maintaining business profit levels.

The result of such measures are essentially two-fold: 1) that as practitioners increase in skills and experience to levels which provide genuine and meaningful interpretation competencies for clients, there is patently less incentive to remain in an industry that fails to support (and in many ways penalises) their efforts by not providing sufficient income to remain sustainable; and 2) that clients are increasingly expected to suffer by having to accept sub-standard interpretation services provided by those whose skills and experience are simply not up to the task. Sub-par access to services in this way can often lead to an increase on the need for continued

services, which places additional financial burden on such services for longer periods.

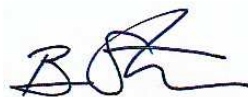
ASLIA fully supports APESMA's application including the claims made by APESMA. We draw your attention to APESMA's public benefit claims (item 4) whereby interpreter's remuneration and conditions have continued to be eroded over the last 15 years within the public sector. APESMA's application for authority to represent T&I practitioners in matters relating to both remuneration and working conditions provides the possibility for actualisation of not only viable career paths for practitioners, but also a decrease in public spending for service providers and users by providing genuine access to such services. Contained within APESMA's application are references to reports and other claims to which ASLIA is able to attest are accurate at the coal-face. Service providers and non-English speakers often suffer at the hands and voices of less-skilled and experienced interpreters and translators in the industry because many skilled and experienced practitioners have become disenfranchised with the industry and thereby have left to pursue other, more gainful employment opportunities. On the other hand, Translators and Interpreters who remain in the field will continue to be subjected to a life of sub-standard remuneration. We urge you to approve APESMA's application as written.

Please do not hesitate to contact ASLIA if you require any further comment or to seek clarification of any pertinent information.

Respectfully,



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