

Management of Interpreting Services

Department of Immigration and Border Protection

Department of Social Services

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Office of the Auditor-General for Australia



Canberra ACT
15 April 2015

Dear Mr President
Dear Madam Speaker

The Australian National Audit Office has undertaken an independent performance audit in the Department of Immigration and Border Protection and the Department of Social Services titled *Management of Interpreting Services*. The audit was conducted in accordance with the authority contained in the *Auditor-General Act 1997*. Pursuant to Senate Standing Order 166 relating to the presentation of documents when the Senate is not sitting, I present the report of this audit to the Parliament.

Following its presentation and receipt, the report will be placed on the Australian National Audit Office's website—<http://www.anao.gov.au>.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Ian McPhee'.

Ian McPhee

The Honourable the President of the Senate
The Honourable the Speaker of the House of Representatives
Parliament House
Canberra ACT

AUDITING FOR AUSTRALIA

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Abbreviations and glossary

AUSIT	Australian Institute of Interpreters and Translators Incorporated
CRIS	Cost Recovery Implementation Statement (formerly Cost Recovery Impact Statement)
DIBP	Department of Immigration and Border Protection
DSS	Department of Social Services
EAP	Employee Assistance Program
FSSD	Financial Strategy and Services Division
IDF	Immigration detention facility
IMA	Irregular maritime arrival
JESSICA	Job Entry System Supporting IVR (Interactive Voice Response Unit) and CTI (Computer Telephony Integration) Applications
NAATI	National Accreditation Authority for Translators and Interpreters
OPA	Official Public Account
OPC	Offshore processing centre
PGPA Act	<i>Public Governance, Performance and Accountability Act 2013</i>
SRSD	Status Resolution Services Division of the Department of Immigration and Border Protection
TBSSC	TIS National Business Strategy Steering Committee
TIS	Translating and Interpreting Service
WHS	Work health and safety

Summary and Recommendations

Summary

Introduction

1. One quarter of Australia's resident population was born overseas. In the 2011 census, 19 per cent of the total population spoke a language other than English at home. Of this 19 per cent (4.085 million), 17 per cent (694 450) stated they could not speak English well or at all.¹ Interpreting services provide non-English speakers in Australia with the ability to access essential services, such as government services, medical assistance and legal advice. Some people, such as those in immigration detention², including community detention, also have substantial requirements for interpreting services.

2. Australia's interpreting industry is maturing, with a growing number of private sector and government providers. It is a varied industry, with a common brokerage model, whereby service providers match clients with interpreters in the required language. In Australia, there are between three and five thousand active interpreters covering more than 170 languages and dialects. The industry has a predominantly casual workforce, characterised by lower salaries and less generous conditions of service than many other occupations.

3. Interpreting services are provided in a wide range of environments. These include: the detention network and refugee processing; medical consultations with general practitioners and in hospitals and mental health facilities; courts and police stations; and emergency situations. For these reasons, interpreting services are provided on a twenty-four hour/seven days a week basis.

Translating and Interpreting Service

4. As new migrants settled in Australia following the second world war, the need for language services was recognised. The Commonwealth Government assumed responsibility for translating functions in 1958 and in 1973 established a free telephone interpreting service. In 1991, these services were combined into the Translating and Interpreting Service (TIS). This service was established within the Department of Immigration and Border Protection

1 Australian Bureau of Statistics, 2011 census, available from <http://profile.id.com.au/australia/language>. [Accessed 11 February 2015].

2 For the purposes of this report 'immigration detention' includes the detainees in offshore processing centres.

(DIBP), to provide telephone and on-site interpreting services and to manage a small translation program. TIS National³, as it is now known, provides a brokerage service, matching clients with interpreters (service providers) on a twenty-four hour, seven days a week basis.

5. TIS National is one of the largest public sector interpreting service providers. It has almost 3000 registered interpreters, covering approximately 170 languages and dialects providing telephone and on-site interpreting services to three client categories: internally to DIBP, to eligible clients for whom interpreting services are free of charge, and to fee paying clients. Its major client is DIBP, for which it provides interpreting services to communicate with detainees, both onshore and offshore and to facilitate access to DIBP's other services. TIS National also provides free interpreting services to eligible clients accessing eligible services⁴ through the Settlement Services Program, managed by the Department of Social Services (DSS). In addition, TIS National provides services to non-DIBP clients (on a fee-paying basis), including other government entities.

Administrative arrangements

6. TIS National is a cost centre within the Visa and Offshore Services Division of the department. It provides services within the department but also acts as a commercial service provider within the interpreting industry. Its financial arrangements, including its costing and billing framework, are guided by the Financial Strategy and Services Division (FSSD) of the department.⁵

7. In 2013–14, TIS National generated just over \$153 million in revenue, two-thirds (\$100 million) of which was notional, for providing internal services within DIBP.⁶ Around one quarter of TIS National's revenue (\$37 million) was paid by external fee paying clients, with the balance (\$15 million) coming from

3 TIS National no longer has any role in the provision of translating services. This service is provided through the Department of Social Services (DSS) on a contractual arrangement with a private service provider.

4 Free interpreting services are provided to non-English speaking Australian citizens and permanent residents communicating with approved community organisations and individual service providers.

5 In February 2015, the Secretary of the Department announced significant changes to the department's structure, anticipating integration with the Australian Customs and Border Protection Service on 1 July 2015. References in this report are to the departmental structure as it existed at the time of fieldwork during 2014.

6 Interpreting services provided to internal DIBP clients are notionally charged for at the same rate as those for external clients. Internal accounting arrangements mean that no actual money is transferred within the department.

the provision of fee free services through the Settlement Services Program. Growth in demand for TIS National interpreting services has, on average, been around 20 per cent per annum, increasing from over 1.1 million telephone interpreting services being provided in 2011–12 to 1.5 million in 2013–14. The number of on-site interpreting services increased from just over 66 000 to more than 81 000 in the same period.

Multicultural access and equity

8. The objectives of the Government's multicultural access and equity policy include equal access to government and other services. The adequate provision of interpreting services is an essential element of the success of that policy. Successive reviews of multicultural access and equity programs have found that the lack of English competence was the principal obstacle for migrants when trying to access services and information. An efficient interpreting industry is an essential component of providing equality of access to services for non-English speakers.

9. The Australian Government recognises that quality language services are an important part of the Government's commitment to access and equity. A joint DSS and DIBP review, which commenced in September 2014, will provide advice on government investment in the translating and interpreting industry and how DSS's and DIBP's requirements for interpreting services should be delivered. An assessment of TIS National's contribution to the provision of interpreting services will be considered by the review, which is expected to report in April 2015.

Audit objective, scope and criteria

10. The audit objective was to assess the effectiveness of the Department of Immigration and Border Protection in delivering high quality interpreting services to its clients.

11. To form a conclusion against the audit objective, the ANAO adopted the following high level criteria:

- the department has effective business and program management arrangements;
- the interpreting workforce is managed effectively;
- high quality interpreting services are delivered; and

- the delivery of interpreting services facilitates compliance with the multicultural access and equity framework.

Overall conclusion

12. There are almost 700 000 people in Australia whose first language is not English and who do not speak English well or at all.⁷ To access essential services these people rely on the availability of interpreting services, either delivered via the telephone or, less often, in person. In this context, the Department of Immigration and Border Protection (DIBP) has a specific ongoing need for interpreting services for new and existing migrants and those people in immigration detention. TIS National, an internal business unit within DIBP, primarily provides interpreting services to the department, but also to other clients. One of these clients is the Department of Social Services (DSS), which funds fee free services for eligible users under the Settlement Services Program. As such, the interpreting services delivered through TIS National are a major contributor to the fulfilment of the Government's access and equity policy objectives.

13. TIS National has effective arrangements in place for providing a range of interpreting services to DIBP and to external clients. It is also a significant participant in Australia's interpreting industry, with almost 3000 registered interpreters. An internal review of TIS National services in 2010 prompted an update of managerial requirements, as well as the implementation of projects to upgrade technology to increase TIS National's competitiveness and to improve interactions with its client base. Further, TIS National is active in implementing policies to increase the learning and development opportunities available to its interpreters and the professionalism of the interpreting industry.⁸ However, while the provision of interpreting services is managed effectively, the TIS National business unit would benefit from stronger administrative arrangements in several key areas. These areas include clarifying the strategic direction for TIS National and the policy basis for the

7 Australian Bureau of Statistics, 2011 census, available from <http://profile.id.com.au/australia/language>. [Accessed 11 February 2015.]

8 These changes include an interpreter allocation policy which gives priority in the allocation of interpreting jobs to the best qualified interpreters in the language, the introduction of accreditation based pay, and the encouragement of professional development through reimbursement of professional registration fees and scholarships and sponsorships.

charging of fees for interpreting services, and better preparing and supporting interpreters when deployed to DIBP's immigration detention facilities.

14. In line with multicultural access and equity awareness, the demand for TIS National services has grown substantially over the decades. The day-to-day management response to this increase in demand has been effective, but ongoing operations have lacked a strategic focus, particularly in respect of TIS National's role as a government owned service provider in a maturing interpreting industry. Clarifying TIS National's strategic policy objectives would enable both the department and TIS National to develop appropriate business solutions to underpin its interpreting service delivery model, currently a combination of services delivered internally to DIBP and externally to other government and commercial entities and private individuals. This clarification of objectives is likely to be informed by the joint DSS/DIBP review of TIS National, which is currently underway.

15. TIS National provides interpreting services to its clients, including DIBP, and charges fees for these services. DIBP has characterised TIS National's services as a cost recovery activity for many years. Under the government's cost recovery policy, entities are able to recover the efficient costs of their cost recoverable activities and retain these amounts. However, DIBP's analysis shows that TIS National has been recovering amounts in excess of its costs. In practice, DIBP is charged at cost for TIS National services, and external clients are charged on a commercial basis. Once TIS National's role is settled, DIBP will need to consider the most appropriate financial arrangements to be applied to TIS National services.

16. DIBP is the biggest user of TIS National interpreting services and the operational area which consumes the most interpreting resources is the department's detention network. The deployment of interpreters to the network is a complex exercise, with responsibility being shared by DIBP's Detention Operations Branch and TIS National. Currently, interpreters deployed to the network are not given access to the same pre-deployment resilience assessment, training and post deployment debriefs, as other DIBP workers. There is also a lack of clarity in relation to the respective management responsibilities of DIBP and TIS National for interpreters on deployment. Providing appropriate support to interpreters, and clarifying the roles and responsibilities of the staff in the immigration detention network charged with managing interpreters while on deployment, would better support the interpreters and assist in managing their wellbeing during these engagements.

17. Notwithstanding the outcome of the previously mentioned joint DSS/DIBP review, DIBP will need to determine the financial arrangements that should apply in relation to the delivery of TIS National's interpreting services. In this context, the ANAO has made two recommendations directed towards determining the most appropriate financial arrangements for TIS National's services and for preparing and supporting interpreters prior to, during and post their deployment to the detention network.

Key findings by chapter

TIS National's Administrative Arrangements (Chapter 2)

18. TIS National is managed by a Director and has three staffing cohorts: almost 3000 registered interpreters, employed on a casual basis; approximately 66 full-time equivalent (FTE) permanent administrative staff (31 per cent); and 126 FTE non-ongoing contract staff (69 per cent) in its call centre. Senior management oversight is provided by the Visa and Offshore Services Division, complemented by policy and operational guidance from the TIS National Business Strategy Steering Committee (TBSSC).⁹

19. Following an internal departmental review in 2010, TIS National's management has been proactive in driving innovations in communications technology to provide more efficient and client focussed interactions and making the organisation more responsive to commercial pressures.

Strategic direction

20. As previously discussed, TIS National provides services internally to the department, and externally to other fee paying clients and on a fee free basis as part of DSS's Settlement Services Program. Demand for TIS National's services has grown by, on average, 20 per cent per annum over recent years. TIS National has responded reactively to this growth in demand for services generally, as well as increases in demand for interpreters in DIBP's detention facilities. However, the department has not developed strategic policy priorities for the interpreting service. The current review of government investment in the translating and interpreting industry, being conducted jointly by DIBP and DSS, provides an opportunity to determine TIS National's strategic direction.

9 Membership comprises the Deputy Secretary, Client Services Group (Chair), senior departmental executives and TIS National management.

Administrative arrangements

21. TIS National's business planning and administrative arrangements provide an effective framework for delivering its interpreting services. The call centre operations are well managed and business and program reporting is comprehensive, with monthly and annual reports being provided to the Director and senior executives. Business initiatives, such as moves towards the implementation of self-service technology, to better manage client and interpreter communications are being progressed. Upgraded telephony is being implemented and video interpreting options are also being explored. Appropriate risk management strategies and operational procedures have also been developed in response to a fire at the Melbourne premises in 2012.

Financial management

22. Currently, DIBP characterises TIS National's interpreting services as a cost recoverable activity. The government's cost recovery policy enables the efficient cost of such an activity to be recovered and retained by the entity. Such cost recovery arrangements are normally applied to regulatory activities in a non-competitive environment and are covered by the government's cost recovery guidelines. However, TIS National's interpreting activities provided to non-DIBP clients, are delivered in a commercial environment and, consequently, its fees are set on a commercial basis.

23. TIS National has imposed fees for its interpreting services for many years. In 2011, the department undertook a review to determine the underlying costs of TIS National's activities. That review demonstrated that there was significant over recovery of costs for all but one of TIS National's services, contrary to the government's cost recovery guidelines.¹⁰ In response to this audit, DIBP again assessed the extent to which its fees aligned with expenses. The department's analysis of data from 2014 shows that there continues to be a significant over recovery of costs.

Interpreting services and multicultural access and equity

24. Successive reviews of multicultural access and equity programs have identified a lack of competence in English as the principal obstacle for migrants wishing to access information. As part of the Settlement Services Program for

10 Section 74 of the *Public Governance, Performance and Accountability Act 2013* only permits entities to retain the efficient costs of the services provided. Any over-recovered amounts are required to be returned to the Official Public Account (OPA).

new migrants, the Government offers free access to interpreting services in certain situations. Further, the availability of fee free interpreting services is another mechanism to address this problem.

25. At present, DSS administers the fee free interpreting services program, delivered through TIS National. TIS National also provides services to clients other than DSS, such as government departments, non-government organisations and utilities companies, providing interpreting services on a fee for service basis, which enables these entities to meet their access and equity obligations.

Interpreter Workforce Management (Chapter 3)

26. TIS National faces a number of challenges in managing its interpreter workforce, including the escalating demand for interpreter services; changing demands for priority languages; a highly casualised industry in which interpreters are self-employed; and relatively few education opportunities for professional advancement and recognition.

27. TIS National's registered interpreters have expertise in 170 languages and dialects. It recruits interpreters through ongoing website invitations to register as an interpreter and contracts with them via a deed of standing offer. It also has a contractual arrangement with a second interpreting agency to cover any shortfall in available interpreters.

28. TIS National supports moves to increase the professionalism of the industry through: its interpreter allocation policy, which gives priority in the allocation of interpreting jobs to the best qualified interpreters in the language; the introduction of accreditation based pay, to encourage interpreters to raise their level of qualifications; the encouragement of professional development through reimbursement of professional registration fees and scholarships and sponsorships. These initiatives are designed to improve the quality of the services provided.

29. TIS National's mystery shopper program, was introduced in 2012 for quality assurance and performance management purposes. The mystery shopper program entails a contracted agency making up to 140 calls per month across seven major language groups. The monthly reports analysing the results provide TIS National with ongoing assessments of the quality of its telephone interpreting services. The program also enables TIS National to assess the performance of its interpreters individually and to detect any trends in performance issues across the workforce that may require attention.

Deploying Interpreters to Detention Facilities (Chapter 4)

30. Interpreters are essential to the effective management of DIBP's detention network. TIS National provides interpreters to the department as a priority activity, both for onshore processing and for other work in the detention network and the community. This work takes up 82 per cent of TIS National's resources and provides over two-thirds of its revenue.

31. The deployment of interpreters to the detention network is a shared responsibility between DIBP and TIS National. DIBP determines the number of interpreters to be deployed to the network and the languages required and TIS National supplies the interpreters. Interpreter numbers are generally determined by requests originating from interpreter coordinators, the key DIBP person responsible for managing interpreters in the detention network.

Management of interpreters in the detention network

32. While a degree of local flexibility is important, the management of the interpreting function and interpreters across the detention network would benefit from clarification of the lines of responsibility for two key elements of this management responsibility. The first element is the efficient use of interpreters in the facility for the duration of their deployment; and the second is the management of interpreters in terms of their wellbeing while on deployment, for example for such matters as accommodation, transport and communications requirements. While TIS National has a role in the management of interpreters generally, the interpreter coordinators, who are part of DIBP's detention operations function, formally manage the interpreting function and individual interpreters while they are on deployment. The interpreter coordinator role includes conducting interpreter meetings and providing feedback to interpreters on certain performance issues, both individually and collectively. In practice, some interpreter coordinators do not always organise these meetings, record the proceedings or address the concerns raised by interpreters. Further, DIBP acknowledges that some interpreter coordinators do not have sufficient management experience and training prior to undertaking this task.

Work health and safety in the detention network

33. The management of interpreters on deployment is a challenge for DIBP and TIS National. These challenges are compounded by the remoteness and offshore location of some of the facilities and by the nature of the work in which interpreters are engaged. The department and TIS National recognise

these difficulties and have been working together to improve the working conditions for interpreters.

34. Interpreters, like many other workers within the detention network, have a difficult job to do. The mental health interviews and those where detainees are being interviewed to progress their application for refugee status can be stressful. The combination of the physical environment and the nature of the work being undertaken while in the detention network means that particular attention must be given to providing a safe work environment and preparing interpreters for deployment. Currently interpreters are not given a pre-deployment resilience assessment, nor are they offered the opportunity to have a post deployment debrief.

Summary of entity responses

35. The proposed audit report was provided to the Department of Immigration and Border Protection and to the Department of Social Services. The entities' summary responses to the proposed report are provided below, while the full responses are provided at Appendices 1 and 2.

Summary of DIBP response

The Department of Immigration and Border Protection (DIBP) welcomes the findings outlined in the report of the audit on the Management of Interpreting Services by the Department's language services provider, TIS National. In particular, DIBP welcomes the conclusion that TIS National has effective arrangements in place for providing a range of interpreting services to DIBP and to external clients.

DIBP agrees with the two recommendations as presented in the proposed audit report. The DSS/DIBP review of TIS National, which is currently underway, will clarify the policy basis for setting the fees charged for interpreting services. TIS National will engage an independent supplier to undertake a detailed analysis of its cost base and will participate in a voluntary tender submission process available as part of a Competitive Neutrality Review. The Department will also implement improved support arrangements before, during and after deployment to facilities in the detention network.

Summary of DSS response

DSS agrees that a clarification of the strategic objectives of TIS National will inform future improvements to effective service delivery and that this will be considered as part of the TIS National review.

DSS also notes the report's acknowledgement of the role that TIS National plays in relation to the Government's Multicultural Access and Equity Policy, an area for which DSS is responsible. DSS agrees that the extent to which TIS National monitors its contribution to the achievement of access and equity objectives may also usefully be considered as part of the review process, taking into account a clarified strategic rationale for TIS National.

Recommendations

Recommendation No. 1

Paragraph 2.50

To provide a sound basis for TIS National's charging of fees for interpreting services, the ANAO recommends that the Department of Immigration and Border Protection:

- reviews the policy basis for setting the fees charged to internal and external clients; and
- takes steps to comply with the applicable requirements and government guidelines.

DIBP's response: *Agreed*

Recommendation No. 2

Paragraph 4.64

To improve the support arrangements provided to interpreters before, during and after deployment to facilities in the detention network, the ANAO recommends that the Department of Immigration and Border Protection provides contracted interpreters with appropriate resilience preparation and debriefing services.

DIBP's response: *Agreed.*

Audit Findings

1. Background and Context

This chapter outlines the policy and administrative context for the Department of Immigration and Border Protection's arrangements to deliver interpreting services and the audit objective and approach.

Introduction

1.1 Interpreting services provide the means by which the Australian Government and other individuals and organisations can communicate with newly arrived migrants and residents, and others who are not fluent in English.

1.2 Australia's resident population of 21.5 million people includes approximately 5.3 million people who were born overseas. Eight of the top 10 countries of birth¹¹ for this overseas born population are countries where the first language is not English. The results of the 2011 census show that 19 per cent of the population (4 million people) spoke a language other than English at home and 17 per cent of this cohort (694 450 people) could not speak English well or at all.¹² Interpreting services, therefore, have traditionally been offered as part of the Australian Government's settlement services program to assist new arrivals and those without a basic capability in English to participate as soon and as fully as possible in Australian society by minimising the effect of language barriers.

The interpreting industry

1.3 The interpreting industry in Australia comprises interpreters, interpreting service providers that link interpreters to clients, and the professional associations that manage aspects of the industry or act for it in various fora.

Interpreters

1.4 Interpreting is the oral rendering of the spoken word from one language to another. The interpreter must render the translation within the following parameters:

- facilitate clear communication between two parties from linguistically and culturally diverse backgrounds;

11 In order, these are the United Kingdom, New Zealand, China, India, Italy, Vietnam, Philippines, South Africa, Malaysia and Germany.

12 Australian Bureau of Statistics, 2011 census, available from <http://profile.id.com.au/australia/language>. [Accessed 11 February 2015].

- communicate everything said without distortion or omission; and
- be professionally detached and impartial throughout an interpreting assignment.

1.5 Interpreters work in a wide range of environments, including the immigration detention network, hospitals and mental health facilities, courts, police stations, legal offices and with government service providers. Some of the specific challenges faced by interpreters include:

- inexperience on the part of clients working with interpreters;
- the nature of the job itself which can be mentally and emotionally demanding; and
- in some cases, deployment to the detention network, where interpreters may experience a difficult physical environment and lengthy periods of separation from friends, family and traditional support systems.

1.6 Interpreting is also characterised by lower salaries and less generous conditions of service when compared with many other occupations.¹³ The industry has a predominantly casual workforce, where interpreters are generally paid by the hour (or part thereof) and employment is often uncertain. Recognition of higher qualifications is limited and interpreters, as contractors, bear many of the costs of their employment, including professional development, travel costs and tools of trade, such as mobile phones and computers.

Service providers

1.7 Interpreting service providers include Australian and state government agencies, and private providers. One of the largest Australian Government providers is the Translating and Interpreting Service (TIS National). Centrelink (part of the Department of Human Services) also has a large in-house interpreting service. State government providers include the Victorian Interpreting and Translation Service, the New South Wales Community Relations Commission, Queensland Health Interpreting Service and the South Australian Interpreting and Translating Centre. The major private providers include On Call and Ethnic Language Services.

13 Professionals Australia estimates the median wage for interpreters to be around \$30 000 a year.

Professional bodies

1.8 The Australian Institute of Interpreters and Translators Incorporated (AUSIT) is the national professional association for interpreters. AUSIT produces and updates periodically a Code of Ethics, which sets the standards for the ethical conduct of interpreters in Australia and New Zealand. The association holds events and training workshops and generally aims to provide a forum to foster professional development and promote quality standards for interpreters.

1.9 The National Accreditation Authority for Translators and Interpreters (NAATI) is the national standards and accreditation body for interpreters in Australia. It was established in 1977 to develop standards for the expanding interpreting industry. NAATI is owned and jointly funded by the Australian, state and territory governments. It tests and accredits interpreters and certifies tertiary level courses in interpreting. Together, AUSIT and NAATI set, maintain and monitor standards in the translation and interpreting profession in Australia. AUSIT recognises NAATI accreditation as the minimum basic qualification for practising as a professional interpreter in Australia. NAATI endorses and promotes the AUSIT Code of Ethics for interpreters and translators.

1.10 Professionals Australia has been approved as the union to represent interpreters.¹⁴ Professionals Australia advocates for policy changes at state, territory and Australian Government levels to drive procurement improvements in order to promote better conditions for interpreters.

TIS National

1.11 The Department of Immigration and Border Protection (DIBP) manages TIS National.¹⁵ TIS National provides a brokerage service, matching clients with interpreters via a telephone contact centre and an online booking service. The services provided include a twenty-four hour, seven days a week telephone interpreting service and on-site interpreting services. Free interpreting services are provided to non-English speaking Australian citizens and permanent residents communicating with approved community organisations and individual service providers. Fee free services are provided

14 Professionals Australia was approved by the Australian Competition and Consumer Commission to take on this role in February 2014.

15 Originally 'TIS' meant 'telephone interpreting service', which was the scope of the services provided up until the late 1980s. When services were broadened to encompass on-site interpreting, the acronym was amended to 'translating and interpreting services', although TIS National no longer has a role in the provision of translating services.

to eligible individuals accessing eligible services, through the Australian Government's settlement services program. TIS National charges fees to clients who request interpreting services and who are not eligible for fee free services.

1.12 The majority of TIS National's services are delivered within DIBP's detention network, both onshore and offshore. Non-DIBP services are provided on either a fee free (depending on meeting certain eligibility rules) or fee for service basis.

1.13 Demand for TIS National services has grown at an estimated 20 per cent per annum since December 2011, with the growth in demand expected to increase to 25 per cent in future years. Table 1.1 shows the growth in demand over the last four calendar years.

Table 1.1: Demand for TIS National services from 2011–14 (by calendar year)

Services delivered	2011	2012 ¹	2013	2014
Telephone	1 022 774	980 129	1 357 544	1 335 890
On-site	66 097	68 110	80 756	82 224
Total	1 088 871	1 048 239	1 438 300	1 418 114

Source: TIS National data.

Note 1: A major fire in TIS National's call centre occurred in August 2012 disrupting services for several months.

1.14 DIBP is the single largest user of TIS National services, consuming around 25 per cent of total services (known as 'jobs'). These jobs involve around 85 per cent of TIS National's interpreting effort, when measured by time taken.¹⁶ The high proportion of services devoted to DIBP interpreting reflects the time consuming and expensive nature of on-site interpreting services at some of the more remote immigration detention facilities, where DIBP requires interpreters to be available on a seven day a week extended hours basis. Table 1.2 summarises TIS National's DIBP, non-DIBP and fee free service activities, and its reported revenue for 2013–14.

16 TIS National's management information system breaks 'jobs' down by minutes consumed.

Table 1.2: TIS interpreting activity and revenue 2013–14

Activity and revenue	DIBP	Non-DIBP	Settlement services (fee free services)
Number of jobs	386 402	879 259	234 852
Minutes consumed	119 315 444 (85 per cent)	14 631 893 (10 per cent)	7 305 095 (5 per cent)
Revenue ¹⁷	\$100 734 631	\$37 048 253	\$15 793 222

Source: ANAO analysis of TIS National advice to ANAO, 29 September 2014.

1.15 TIS National's non-DIBP and fee free client profile is shown in Table 1.3. The top 10 fee paying non-DIBP clients are shown in the next chapter at Table 2.3.

Table 1.3: TIS National non-DIBP client profile

Agency	Number of client codes ¹⁸	Agency	Number of client codes
Fee paying services		Fee free service	
Australian Government agency ¹	5464	Local government	321
Contracted client ²	33	Medical practitioner ³	23 506
Non-government organisation	2245	Non-government organisation	761
Private sector	4218	Parliamentarian	167
State/territory government agency	4022	Other private sector	332
Overseas client	16	Trade union	40
Total	15 998	Total	25 127

Source: ANAO analysis of TIS National data.

Note 1: TIS National deals with its Australian Government clients at a cost centre level, which accounts for the large number.

Note 2: Contracted clients are clients who have an existing contractual relationship with DIBP as a service provider (such as Serco) and under the terms of their contract are required to use and pay for TIS National services.

Note 3: Medical practitioners comprise the largest single category using fee free services through the Doctors' Priority Line.

¹⁷ The revenue figures quoted are the figures generated prior to an internal discount of 34 per cent being applied to both DIBP and DSS fee free services. In 2014–15, the discount applied to the fee free services will reduce to 15 per cent. Interpreting services provided to internal DIBP clients are notionally charged for at the same rate as those for external clients. Internal accounting arrangements mean that no actual money is transferred within the department.

¹⁸ Anyone wishing to use TIS National services is assigned a client code in the TIS National job entry system.

Reviews of interpreting services

1.16 The delivery of interpreting services has been the subject of periodic policy and administrative reviews. The Parliament and government agencies have had an ongoing interest in the provision of interpreting and translation services to non-English speaking Australians, particularly in the context of Australia's access and equity policies. Key reviews include the:

- 1992 evaluation of the 1985 implementation of the Australian Government's Access and Equity Strategy;
- 1996 House of Representatives Standing Committee on Community Affairs report on migrant access and equity, *'A fair go for all: report on migrant access and equity'*;
- triennial reports produced by the then Department of Immigration and Citizenship from 2006 until 2012, on access and equity in government services;
- 2009 report by the Commonwealth Ombudsman on the use of interpreters in Australian Government agencies; and
- 2011 ministerial review of the access and equity policy.

1.17 There have also been several internal reviews of TIS National, the most significant of which were:

- a 1997 internal review, which primarily focussed on options for enhanced service delivery and the need to streamline the administration of this national service;
- a 1997 review of the usage and accessibility of interpreters and translators;
- a 1998 review by the then Department of Immigration and Multicultural Affairs of the use of qualified interpreters and translators by Commonwealth agencies for the purpose of developing a policy proposal on the use of interpreters by Commonwealth agencies;
- DIBP internal audits of:
 - TIS processes and controls (March 2001); and
 - TIS operations (November 2006);
- a review of settlement services in 2003; and

- a review of TIS National conducted in 2010 by Ernst and Young on behalf of DIBP and subsequent internal review by the department's Financial Strategy and Services Division.

1.18 The external and internal reviews of TIS National have consistently identified ongoing challenges for the organisation, which include the:

- difficulties in recruiting interpreters for 'new and emerging' languages due to fluctuations in the migrant and humanitarian intakes and the consequential range of language groups to be covered;
- high costs of providing quality services; and
- keeping pace with improved technology through ongoing investment.

Audit objective, criteria and methodology

1.19 The audit objective was to assess the effectiveness of the Department of Immigration and Border Protection in delivering high quality interpreting services to its clients.

1.20 To form a conclusion against the audit objective, the ANAO adopted the following high level criteria:

- the department has effective business and program management arrangements;
- the interpreting workforce is managed effectively;
- high quality interpreting services are delivered; and
- the delivery of interpreting services facilitates compliance with the multicultural access and equity framework.

1.21 The focus of the audit was on the delivery of interpreting services by DIBP. The audit methodology included:

- fieldwork in TIS National, DIBP and the DSS, including interviews with relevant staff from each of these agencies;
- examination of documentation relating to the delivery of interpreting services and the operations of TIS National;
- consultation with available interpreters as well as a survey of all TIS National registered interpreters. The survey was designed to gain insights into the performance of TIS National as an employer and

service provider, and to identify any potential barriers to improved interpreter performance; and

- consultation with key stakeholders, including AUSIT, NAATI and clients.

1.22 Audit fieldwork was undertaken in DIBP and DSS offices in Canberra and TIS National's premises in Melbourne. The audit team also visited three locations where interpreters provide on-site services within the detention network.¹⁹

1.23 The audit was conducted in accordance with the ANAO Auditing Standards at a cost to the ANAO of \$504 000.

Structure of the Report

1.24 The structure of the Report is:

Chapter	Chapter overview
Chapter 2: TIS National's Administrative Arrangements	This chapter examines TIS National's administrative arrangements, including its financial framework as well as its contribution to the multicultural access and equity policy framework.
Chapter 3: Management of the Interpreter Workforce to Deliver High quality Services	This chapter examines TIS National's management of its interpreter workforce and strategies to deliver high quality services.
Chapter 4: Deploying Interpreters to Detention Facilities	This chapter examines the Department of Immigration and Border Protection's management of the deployment of interpreters to the immigration detention facility network. The department's work health and safety obligations to interpreters working in this environment are also discussed.

19 The ANAO visited the Melbourne Immigration Transit Accommodation, and the Wickham Point and Blaydin facilities in the Northern Territory.

2. TIS National's Administrative Arrangements

This chapter examines TIS National's administrative arrangements, including its financial management framework, strategic direction and its contribution to the multicultural access and equity policy framework.

Introduction

2.1 TIS National was established in 1973 in Sydney and Melbourne as an emergency telephone interpreting service. It has grown over the last 40 years into a major service provider in the interpreting industry, largely in response to emerging DIBP operational needs, and increased general demand for interpreting services that facilitate access to services and information by non-English speakers. Growth in demand for services has led to a corresponding increase in TIS National's revenue base.

2.2 TIS National is a stand alone interpreting business operating within DIBP. It provides telephone and on-site interpreting services to DIBP and other government agencies, and to the general public. DIBP is its major client, with fee free interpreting services provided to eligible clients and fee for service interpreting services to anyone who wishes to pay for them.

2.3 The ANAO examined the arrangements DIBP has in place to effectively manage TIS National. In particular, its financial management framework, the role and strategic direction of the business unit and its contribution to the government's multicultural access and equity policy framework were reviewed.

TIS National's management arrangements

2.4 TIS National is part of the Visa and Offshore Services Division of DIBP and is overseen by the Global Manager Client Services.²⁰ It is situated in Melbourne in DIBP's Victorian Regional Office with administrative support functions provided by DIBP. TIS National is managed by a Director, with responsibility for the business unit and three staffing cohorts: almost

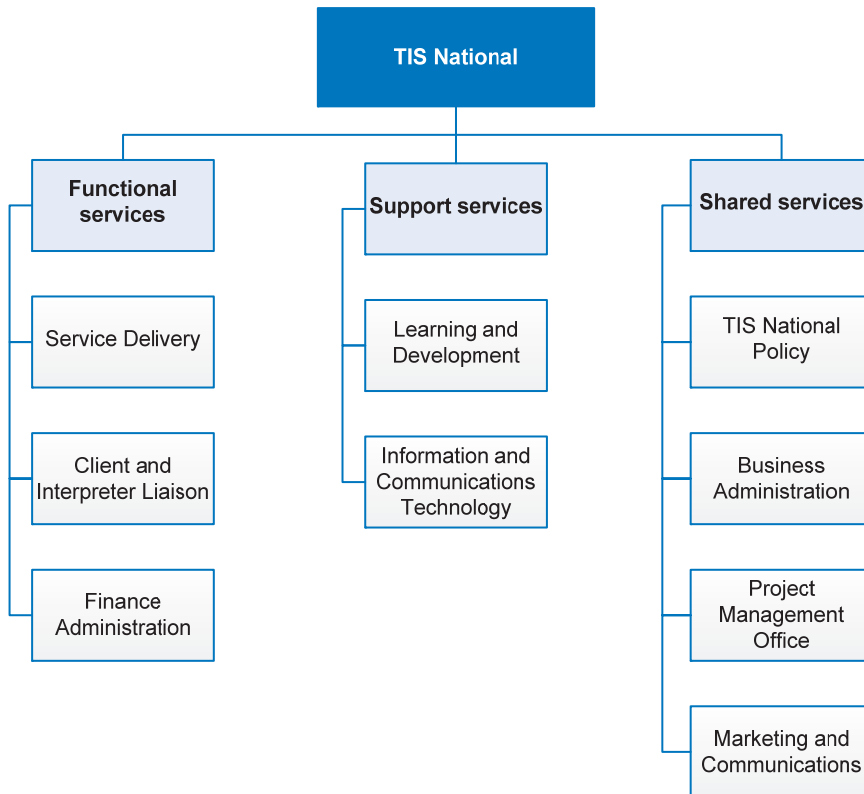
²⁰ In February 2015, the Secretary of the Department announced significant changes to the department's structure, in anticipation of its integration with the Australian Customs and Border Protection Service on 1 July 2015. References in this report are to the departmental structure as it existed at the time of fieldwork during 2014.

3000 registered interpreters, employed on a casual basis²¹; approximately 66 full-time equivalent (FTE) (31 per cent) permanent administrative staff; and 126 FTE (69 per cent) non-ongoing staff.

2.5 The major business units in TIS National are set out in Figure 2.1 and comprise:

- functional services including:
 - a 24/7/365 contact centre, of seven teams, including a shift team, that works outside standard business hours, and the on-site and pre-booked interpreter booking teams;
 - client and interpreter liaison, including an irregular maritime arrival (IMA) team, that liaises with DIBP’s strategic planning and logistical support team for the provision of interpreters throughout the detention network; and
 - financial administration, including invoicing, monitoring of debt and financial reporting;
- support services—learning and development and ICT technology; and
- shared services, which include TIS policy, business administration, contracts, business analysis and reporting, quality assurance, project management, and marketing and communications.

21 Management of the interpreter cohort is discussed in more detail in Chapter 3.

Figure 2.1: TIS National Functional Structure

Source: TIS National Functional Structure, 2014.

2.6 A key program management issue for TIS National is maintaining appropriate staffing capability, particularly in its contact centre. If staffing in the contact centre is not maintained, the number of calls answered declines, with fewer interpreting services requests being raised and filled, resulting in a reduction in turnover.

2.7 Most staff in the TIS National contact centre are employed on a non-ongoing basis for a maximum of 12 months, after which time they must have a break of three months before re-applying for a position. The Australian Public Service recruitment constraints in early 2014 impacted on TIS National's ability to meet its service levels in the contact centre because of delays in the department gaining permission to fill the non-ongoing positions.

2.8 High turnover is a feature of the contact centre's operations, requiring flexible staffing approaches and close management attention. In order to reduce the impact of high staff turnover on service delivery, early in 2014, TIS National management gained approval for the team leader²² positions in the contact centre to be employed on an ongoing basis. This administrative reform should mean that corporate knowledge is retained at the team leader level, enhancing the likelihood of service standards being met.

Managing key TIS National business development initiatives

2.9 The 2010 internal review of TIS National concluded that its business model required improvement if it was to operate in a commercialised business setting. In particular, the review identified that TIS National needed to improve its service quality and invest in ICT infrastructure. Such improvements would include building on its asset base and purchasing enabling technologies.

2.10 DIBP and TIS National were responsive to the report, moving quickly to establish a steering group and develop a plan to implement the recommendations of the review. Over the last two years, \$10 million has been invested in technology projects. TIS National advised that it is likely that current projects will require up to an additional \$16 million over two years, given demand projections. Recent and current TIS National projects and initiatives include:

- enhanced access to TIS National services;
- e-billing; and
- video interpreting.

Enhanced access to TIS National services

2.11 The primary methods by which external clients access TIS National services is online through its dedicated website or via the telephone contact centre. A dedicated TIS National website (separate from DIBP's website) was launched on 1 July 2013, with progressive improvements to date. Originally the new site re-formatted existing content, targeting access across three major user groups—non-English speakers; interpreters and agency or business clients. Phase two, delivered in August 2013 introduced online forms, eligibility and price calculators. Phase three, TIS Online, is a self-service portal

22 Australian Public Service Level 4 (APS4).

which is expected to deliver automated online booking requests by clients and some degree of management by interpreters in relation to their own bookings. A limited pilot commenced in December 2014, with the portal expected to be available to all TIS National clients and interpreters in early 2015.

2.12 In June 2014, TIS National implemented a new telephony software platform for its contact centre that integrates self-service applications and agent-assisted transactions. As well as ultimately delivering increased automation as part of the move to self-service applications, the system is intended to provide enhanced reporting and real time statistics for call handling in the contact centre. The introduction of this platform also provides TIS National with the capability to handle current volumes of calls within service level standards²³ as well as the capacity for further expansion. Additional future functionality is expected to deliver increased self-service capability, and natural language and voice biometric capability.²⁴ The upgraded telephony platform has assisted the contact centre to meet its grade of service (target standards) obligations in July 2014 for the first time in two years, following setbacks caused by a fire in 2012 (discussed below).

E-billing

2.13 TIS National introduced electronic invoicing (e-billing) in November 2013. Currently, 73 per cent of statements, representing 96 per cent of the dollar value of invoices, is issued by email. TIS National advised that the introduction of e-billing has generated cost savings of approximately \$3000 per month (45 per cent). It also considers that e-billing has delivered supplementary efficiencies such as improved cash flow, better customer self-service, (clients can access their e-bills online without the involvement of TIS National finance staff) and freed up staff for other duties.

Video interpreting

2.14 A video interpreting pilot was conducted by TIS National from 2012 in a number of detention locations around Australia. While the trial demonstrated the usefulness of this interpreting option, particularly in non-sensitive detention settings, there are still some obstacles to be overcome. The major advantage of

23 TIS National has Grade of Service standards for its telephone and on-site services, which include such measures as percentage of calls answered within 30 seconds, percentage of on-site requests allocated to an interpreter within three days and percentage of immediate telephone services connected to an interpreter in a major community language within three minutes.

24 Voice biometric capability allows clients to be identified over the telephone by their voice.

video interpreting was the ability for staff in remote locations to access immediately a wide range of interpreters, with consequential cost and staff savings. The ANAO's discussions with interpreters and users of the service in detention facilities indicated that the pilot had support in the detention network, although hardware and connectivity issues were at times problematic. The hardware was difficult to use and internet connectivity in the centres at the time was not reliable enough to support the service on a fully operational basis.

2.15 The initial trial demonstrated that future success of a video-based channel for interpreting was dependent on:

- the right equipment being supplied and installed at the remote location;
- users being comfortable with the technology and able to use it with minimal input;
- high quality, high speed and reliable connectivity; and
- the service to be supplied being appropriate for the needs of the client base.

2.16 TIS National recognises that there is both an internal DIBP and external need for robust, secure and timely video interpreting services, for example in the support of such services as telehealth and remote medical diagnosis. In 2013, TIS National secured approval for a joint project team to commence an upgraded pilot for a further 12 month period. This pilot is expected to assist TIS National to deliver a service channel to support increased demand for on-site interpreting in regional and remote locations. The latest advice from TIS National indicates that it is in the early stages of taking the pilot into the trial phase early in 2015, prior to rolling the service out to the broader network.

Risk management and business continuity

2.17 TIS National participates in DIBP's corporate planning and risk management processes and also produces its own risk management documentation and business plan. The divisional business plan identifies two high level risks that have particular relevance to TIS National operations: non-compliance with service standards and the failure of the department to provide a safe and healthy working environment. The subsidiary TIS National business plan also identifies more detailed risks specific to its business, principally:

- a failure to provide sufficient interpreter capacity to support irregular migration demand;
- a failure to resolve accommodation issues for its contact centre, which limits its ability to satisfy work health safety (WHS) requirements, expand channel offerings and meet the growing demand from irregular maritime arrivals (IMAs) and other clients; and
- a failure to undertake succession planning.

2.18 TIS National's ability to manage service performance, interpreter supply, and work health and safety issues are discussed in Chapters 3 and 4. As discussed below, accommodation constraints are being addressed by the sourcing of additional contact centre accommodation and re-locating the backup site from outside the city centre to a nearby city site. Additional contact centre accommodation has also facilitated increased channel offerings.

2.19 While TIS National has identified a failure to undertake succession planning as a business risk, it has not identified whether this applies only to staff, or to systems as well, nor has it identified which systems and positions are most critical. For example, the Job Entry System Supporting IVR²⁵ and CTI²⁶ Applications (JESSICA)²⁷, was initially installed in 2002, and provides the interface between TIS National and DIBP's financial management information systems, as well as recording translating jobs by client and interpreter, the language and time taken for the job. DIBP's Financial Strategy and Services Division (FSSD) has identified JESSICA as a critical system and, despite being many years past its anticipated 'life', it remains TIS National's principal business application. There are no contingencies in place for this system or plans for ongoing maintenance of capability.²⁸

Business continuity plan

2.20 TIS National has a business continuity plan in place. This plan, which takes into account the experience of a fire incident in 2012 (discussed below),

25 Interactive Voice Response Unit.

26 Computer Telephony Integration.

27 The JESSICA database enables TIS National to profile such information as jobs requested and performed, jobs unable to be undertaken and the reason for the failure, and trends in demand for different languages. The information supports TIS National's business planning and recruitment strategies.

28 The ANAO also noted that critical operational knowledge of JESSICA is concentrated in one staff member, the IT systems administrator. This situation presents a further knowledge management and business continuity risk to TIS National.

documents the contingency arrangements²⁹ in place to provide for continuous availability of interpreting functions, such as the continued provision of round-the-clock telephone interpreting services, with the highest priority to be given to TIS National's emergency services' 'Priority 1300' lines, and on-site interpreting services. TIS National advised that the business continuity plan, last updated in January 2014, is being re-considered in light of the impending decommissioning of a legacy system.

2012 fire incident

2.21 TIS National's business continuity arrangements were tested by a major fire in August 2012. The fire destroyed telephony equipment, which resulted in major technical difficulties and disruptions to all TIS National phone, IMAs, local on-site and pre-booked services. Office accommodation and equipment were out of service for several months, with only five per cent capacity in the first week after the fire, increasing to 30 per cent by week four. The national priority lines and emergency phone interpreting services were able to continue as per the disaster recovery plan. While a complete recovery of services to full capacity was expected by late October 2012, service level standards did not return to pre-fire levels until approximately July 2014, when the upgraded telephony platform was installed.

Lessons learned from the 2012 fire

2.22 TIS National advised that the fire incident in 2012 has enabled a more informed approach to business continuity planning, with lessons learned including the:

- inadequacy of its backup site for an extended period of time, with service levels not returning to a reasonable level until after three months;
- need for redundant ICT technologies in addition to alternative locations to ensure continuity of service; and
- necessity for a comprehensive communications strategy to govern information dissemination in the event of a disaster.

29 The contingency arrangements provide for physical access to the TIS National premises, continuous 240-volt power supply access, and access to the telephony and information technology systems, including the DIBP network.

2.23 As indicated above, TIS National has now expanded its call centre across two floors, with each floor being connected to a separate network core switch, thereby reducing the risk of both call centres being inoperative at the same time. The recently introduced cloud based telephony platform further reduces dependence on the DIBP infrastructure and network. TIS National is also currently exploring a new and larger backup site, given the limitations of the current site. In addition, it is able to publish alert messages quickly and independently on its stand-alone website homepage.³⁰

2.24 One of the major lessons learned from the incident was the absence of a formal communications strategy within TIS National at the time of the fire. A communications specialist had been appointed shortly before the fire disaster and coordinated communications in response to the incident. TIS National analysed its response to the 2012 disaster, detailing the time of communication, the type of communication and the recipients of the communication at progressive intervals during the disaster and subsequent recovery operation. This information has provided the basis for managing communications for similar future incidents that have the potential to disrupt services.

2.25 One concern raised by an external service provider was the lack of notification by TIS National to other service providers about the fire. The severe disruption to services meant that other providers had to fill the service gap. Some warning or notice from TIS National about the extent of the damage and the likely recovery period would have better prepared key stakeholders for the surge in demand. TIS National advised that it is in the process of introducing an e-communications platform to send targeted emails and SMS communications in the event of any further incident which significantly impacts on the delivery of services. TIS National could consider providing advice through these mechanisms to alternative service providers as well as to its own clients, service users and interpreters.

Management reporting and feedback

2.26 TIS National's performance is reported publicly in DIBP's annual report, where the annual growth in services, number of services performed, by channel and by accredited interpreters and languages in most demand are reported. TIS

30 In 2012, TIS National was required to go through the DIBP protocols to publish notices on the DIBP website, which caused some delays in posting updated information.

National's budget is included in DIBP's portfolio budget statements, separated by type of service, that is telephone and on-site interpreting.

2.27 DIBP and TIS National maintain management oversight of TIS National operations through:

- management reports extracted from information stored in the JESSICA database; and
- monitoring of formal and informal feedback.

Management reporting

2.28 As discussed in Chapter 3, there are presently no externally reported key performance indicators for TIS National's services. TIS National produces internal monthly performance reports which provide advice to management³¹ on service standards, numbers of calls, numbers of requests and services provided for both on-site and telephone interpreting and a profile of IMA services. These reports provide a comprehensive overview of TIS National's workload and performance against service level standards. The main categories reported include:

- information about clients—their usage of the service, the profile of usage (telephone or on-site), and dollar value to TIS National;
- information about interpreters—language skills, their work profile, and the number of jobs they do;
- information about jobs—the time each job takes, which interpreter was used, the client, type of job, and dollar value to the organisation;
- performance measures—language demand, service targets, and bookings information; and
- settlement services (fee free services) jobs.

Analysis of client feedback

2.29 Feedback provides information which can be used to improve programme and service delivery. TIS National updated and harmonised its

31 A comprehensive report is provided to the Director and the Executive Level section managers. An abbreviated version of the report (minus the Appendix containing the detailed statistics) is provided to the First Assistant Secretary, Multicultural and Settlement Policy (DSS); Director, Language Policy (DSS); the Global Manager Client Services; First Assistant Secretary, Visa and Offshore Services and First Assistant Secretary, FSSD.

feedback processes in April 2013 in line with DIBP's Client Feedback Policy, which was introduced in September 2012.

2.30 TIS National has a number of channels available to clients and interpreters through which feedback can be provided, including an online feedback form, a dedicated phone line for external feedback, and a dedicated feedback mailbox. A very small number of feedback items are forwarded from DIBP's Global Feedback Unit (GFU). An assigned staff member manages the receipt, acknowledgement and allocation of feedback items to line areas for resolution, providing timely attention to the matter and tracking of outstanding issues.

2.31 As part of the harmonisation process with DIBP procedures generally, TIS National began producing monthly feedback reports in October 2013. The monthly feedback reports provide information on:

- the origin of the feedback—agency, telephone operators, interpreters and non-English speakers;
- feedback by category—fees and charges, interpreter conduct, interpreter recruitment, language availability, TIS National policy, staff and services, website; and
- channels by which feedback is made.

2.32 Between November 2013 and July 2014, TIS National received a total of 905 feedback items, with 419 delivered through the online form (46 per cent), 315 via email (35 per cent), 160 items by telephone (18 per cent) and 11 items via the GFU (1 per cent). The majority of feedback (75 per cent on average) relates either to the performance of interpreters or complaints from interpreters, which is examined further in Chapter 3.

2.33 TIS National has implemented improvements to its services in response to the findings in the monthly feedback report. For example, as a result of feedback received during February 2014, the following measures were introduced:

- counselling of a number of interpreters in relation to behavioural issues, such as being logged in but not accepting calls, and rudeness;
- increasing the allocation of resources to the on-site team to improve service delivery in this area; and
- facilitating the submission of online feedback forms.

TIS National's financial management

2.34 TIS National is an internal cost centre within DIBP. As such, while it is an independent service delivery unit of the department, it remains subject to financial policy guidelines set by FSSD.³² These policies include applying the Australian Government's cost recovery and competitive neutrality principles to TIS National's financial framework. DIBP initially implemented full cost recovery for TIS National interpreting services in 1991.

2.35 As previously noted, TIS National derives its revenue from the provision of:

- government appropriated fee free interpreting services;
- interpreting services to internal DIBP clients; and
- fee paying interpreting services to external clients.

2.36 Fee free telephone and on-site interpreting services are available to eligible persons who need to access key services. The free interpreting service was funded through DIBP's settlement services program until November 2013, when the program was transferred to DSS. There is now a service level agreement between DIBP and DSS for the provision of fee free services through TIS National.

2.37 Internal DIBP clients and external fee paying clients are charged according to TIS National's advertised schedule of fees. However, internal clients have a rebate applied to the invoiced amount so that the fees amount to the calculated service costs. An internal charge back arrangement by FSSD means that all monthly invoices are notional and result in a zero balance transfer (no actual money is transferred within the department). Table 2.1 sets out TIS National's revenue for the three years 2011–12 to 2013–14.

32 FSSD determines the internal finance policies for the department, including the accounting treatment of TIS National activities.

Table 2.1: TIS National revenue for financial years 2011–12 to 2013–14

Revenue source	2011–12 \$(Million)	2012–13 \$(Million)	2013–14 \$(Million)
Fee free settlement services ¹	11.7	12.3	15.8
DIBP IMA processing	75.7	88.0	83.3
DIBP non-IMA	8.4	12.5	17.4
Fee for service revenue	31.3	28.5	37.0
Total revenue	127.1	141.3	153.5

Source: TIS National and DIBP data.

Note 1: These figures include fee free language services. However, from the 2014–15 financial year the fee free settlement services revenue will be included in the fee for service revenue.

2.38 The ANAO examined:

- DIBP's review of the TIS National financial framework; and
- TIS National revenue and the appropriateness of the application of cost recovery treatment to TIS National finances.

DIBP's review of the TIS National's financial framework

2.39 Following finalisation of the 2010 departmental review of TIS National, DIBP's Executive Committee endorsed the TIS Review Implementation Plan, which included an internal review of TIS National finances, subsequently undertaken by FSSD. Major elements of the review included developing an understanding of the financial relationship between TIS National and DIBP, determining the true cost of the TIS National service and a consideration of competitive neutrality and cost recovery compliance. The TIS Review implementation plan further specified that FSSD needed to: provide detailed explanations of charge backs to TIS National; show how they were calculated (to enable TIS National to make sound business decisions); and develop a pricing methodology and policy. The review acknowledged that profit margins on TIS National services should be negligible.

2.40 The review resulted in a number of detailed reports relating to TIS National's financial framework, which:

- explained TIS National's operations;
- identified TIS National's cost structure, developed a cost catalogue and costing and pricing methodology; and

- undertook revenue and budget analysis.

2.41 DIBP's Executive Committee requested an update on progress to be brought to the Executive Committee within six months of its consideration of the 2010 review report. DIBP has not been able to advise whether this update occurred or if any further consideration of the TIS National financial framework has taken place at the most senior levels of the department after December 2010. Notwithstanding the requirements of the review, the FSSD reports have not been provided to TIS National.

The nature of TIS National's charges

2.42 TIS National currently operates and is reported on as a 'cost recovery' activity. Cost recovery involves a government entity charging the non-government sector some or all of the efficient³³ costs of a specific government activity, which may include the provision of goods, services or regulation for the benefit of the non-government sector. Under s.74 of the *Public Governance, Performance and Accountability Act 2013* (PGPA Act) and paragraph 27 of the Rule pursuant to that Act³⁴, agencies are able to retain revenue collected for authorised activities under s.74.³⁵ DIBP considers that it retains the revenue from TIS National's fee paying services pursuant to this legislation.³⁶ However, s.74 of the Act does not provide the authority to charge a fee. Such authority, which is most often legislative, but can be ministerial, is separately required.³⁷ DIBP has been unable to locate authorisation for its current charging approach.³⁸ Department of Finance advice indicates that in this situation a new authority should be sought from government.

2.43 The Department of Finance cost recovery guidelines set out the government's cost recovery policy. The most recent set of guidelines, published

33 'Efficient' costs are defined in the Department of Finance's most recent version of the Cost Recovery Guidelines as 'the minimum costs necessary to provide the activity while achieving the policy outcomes...'. (p. 34), available from <<http://www.finance.gov.au/resource-management/cost-recover/>>. [Accessed 13 February 2015].

34 Previously, s.31 and Rule 17 of the *Financial Management and Accountability Act 1997*.

35 The Act and Rule permit agencies to retain receipts when these receipts can be characterised as 'an amount that offsets costs in relation to an activity of the entity'.

36 The provision of interpreting services through TIS National is the most significant cost recovery activity in DIBP, responsible for over 90 per cent of the department's cost recovery receipts.

37 Department of Finance, *Resource Management Guide 108, Receipts collected by Commonwealth Entities*, June 2014.

38 DIBP was able to locate ministerial approval dating from 2001, for the recovery of costs for TIS National's services from government agencies and commercial organisations, but this authority did not extend to recovering costs from individual clients.

in July 2014, tabulates key government charge types and their characteristics. The ANAO's analysis at Table 2.2 shows that TIS National's cost recovery activities do not align with the criteria provided in the guidelines.

Table 2.2: Characteristics of government charges—cost recovery fees and commercial fee for service

Type of charge	General description and characteristics	TIS National services
Cost recovery fees	Charging activities are directed by the government	TIS National charges are not directed by the Government. There is no up-to-date ministerial authority for the charges nor is there a relevant Cabinet decision.
	Charging is in relation to an ongoing activity undertaken on behalf of the Commonwealth	Interpreting services provided to DIBP are undertaken on behalf of the Commonwealth, but interpreting services on a fee paying basis are not.
	Charges have a legislative basis	There is no legislative basis for TIS National or for its charging regime.
	Involve charging an individual or non-government organisation	Individuals and non-government organisations are subject to charges but so too are government organisations, including DIBP.
	Revenue is aligned with expenses incurred in providing the activity to the individual or non-government organisation	Revenue is not aligned with expenses.
Commercial charges (fee for service)	Charging that occurs for a product or service in a commercial environment where potential or actual competitors exist	TIS National provides fee paying interpreting services to individuals and organisations in a commercial and competitive environment.
	Generally not compulsory	It is not compulsory to use TIS National interpreting services.
	Involves charges imposed by government business enterprises or other commercial charging arrangements and may be subject to competitive neutrality principles	TIS National sets its charges in compliance with competitive neutrality principles.
	May relate to ad hoc, discretionary activities of an entity, including offsetting the costs of an activity	TIS National's fee paying interpreting services accessed by individuals and organisations are discretionary.
	Revenue from the activity need not equal expenses (it may be more than, less than or equal to expenses)	Revenue from the activity is greater than the expense of providing the activity.

Source: Department of Finance, *Australian Government Cost Recovery Guidelines*, Resource Management Guide No. 304 and ANAO analysis.

2.44 As shown above, TIS National's interpreting service charges do not exhibit the following cost recovery characteristics as set out in the Department of Finance guidelines:

- charges do not reflect the efficient unit costs of the service;
- DIBP has not been able to provide to the ANAO any up-to-date authority to charge;
- TIS National services are not part of a regulatory arrangement where charges are applied to all users of the service; and
- users of the service are not compelled to use TIS National services—they have a choice in a commercial market.

2.45 Because TIS National charges for its interpreting services in a commercial environment, it must comply with competitive neutrality principles. Competitive neutrality means that TIS National cannot take a competitive advantage over its private sector competitors by virtue of its public sector ownership and should set its charges to negate any potential competitive advantage. This can mean that individual fees can be set to generate an acceptable commercial rate of return and may exceed the cost of service delivery, thereby generating a profit or an over recovery outside the guideline tolerances of the cost recovery regime (over or under five per cent of the estimated efficient costs of the service).

2.46 DIBP does not routinely assess the extent of the alignment of fees charged to external clients with TIS National's costs. However, the FSSD review of TIS National's finances in 2011 included analysis of TIS National's inputs and cost drivers. The analysis shows that, in 2011, with one exception, costs were over-recovered by large percentages, up to 165 per cent in the case of one service type. In response to this audit, DIBP again assessed the extent to which its fees aligned with expenses. The department's data shows that in 2014 there continued to be a significant over recovery of costs up to 97 per cent in the case of one service type.³⁹

2.47 The cost recovery guidelines state that government entities should report on cost recovery, both at an aggregate level in their financial statements in accordance with the financial reporting rules, and at the cost recovered activity level on the entity's website, as part of the cost recovery implementation

39 Individual service costs have not been reproduced in this report as they may be commercially sensitive.

statement (CRIS). DIBP reports on cost recovery activity at an aggregate agency level through its financial statements. However, the department does not report on its website at cost recovered activity level and has not prepared a CRIS in relation to TIS National activity since 2007.⁴⁰

2.48 In the absence of a legislative authority to retain over-recovered costs, such monies are returned to the OPA as general government revenue.⁴¹ In 2011, a draft DIBP Executive Committee paper noted that an amount of \$6.1 million had been earmarked for return to the OPA. There is no evidence that the paper was considered by DIBP's Executive Committee, but the department has confirmed that no funds have been returned to the OPA over the last three financial years. TIS National and FSSD advised that, at present, any revenue received over expenditure is set aside each month and reviewed 'intermittently to determine if we can re-invest into TIS or hand back to Finance'. However, the department was unable to quantify the accumulated over-recoveries since 2011, nor could it quantify the over-recovered funds that had been reinvested or the purposes for which such reinvestment had been made. In response to the audit, DIBP advised that:

... our financial statement team and the TIS Business Steering Committee are reviewing this at the moment, in preparation for next year's financial statement audit.

2.49 DIBP should review the basis on which it charges fees to its internal and external clients for TIS National's interpreting services, as well as take the necessary administrative steps to comply with the relevant government guidelines so that its administrative practices are open and transparent and that stakeholders are aware of the basis on which fees are charged.

40 The department prepared cost recovery implementation statements in 2006 and 2011, but TIS National activity was exempted from the 2011 statement.

41 If the entity is relying on the provisions of s.74 of the PGPA Act to retain revenue, then retention of monies is confined to an amount that offsets costs. In general, this means that the entity would not have a legislative mechanism to retain amounts over-recovered and thus amounts in excess of costs would be remitted to the OPA as general government revenue (that is, categorised as administered receipts).

Recommendation No.1

2.50 To provide a sound basis for TIS National's charging of fees for interpreting services, the ANAO recommends that the Department of Immigration and Border Protection:

- reviews the policy basis for setting the fees to internal and external clients; and
- takes steps to comply with the applicable requirements and government guidelines.

DIBP's response:

2.51 *Agreed. The Department will progress on this recommendation by:*

1. *The first element of the recommendation being addressed as part of the DIBP/DSS review of TIS National which is currently underway; the policy basis on which charges and fee structures are applied will be clarified, agreed and formally documented, consistent with government policy.*
2. *The second element of the recommendation will be addressed through two tactical activities:*
 - a. *TIS national will invest in engaging an independent supplier to undertake a detailed cost/service analysis providing a current cost base on which the elements under the Cost Recovery Guidelines can be applied, following this;*
 - b. *TIS National will participate in the voluntary tender submission process available as part of a Competitive Neutrality Review this financial year, noting possible MOG timeframes.*

TIS National's strategic direction

2.52 The strategic challenge for TIS National operations relates to the scope of its service provision. On the one hand, TIS National provides a highly tailored service underpinning many of DIBP's functions. On the other, it provides a range of services to the general community and other government agencies, either for access and equity reasons, or on a fee for service basis. In this context it is appropriate that DIBP periodically reviews TIS National's role and objectives. Such reviews may, where appropriate, include consultations with government about preferred service delivery and ownership arrangements.

DIBP internal review of TIS National

2.53 In 2010, a departmental review concluded that there was a need for government to determine the future policy direction for TIS National, given the increasing sophistication and competitiveness of the interpreting industry. Following the review, in 2011 the department established the TIS National Business Strategy Steering Committee (TBSSC), chaired at Deputy Secretary level. The Committee's terms of reference are:

... to provide strategic direction and prioritisation on TIS specific matters relating to business strategy and priorities, strategic investment, TIS financials, cost of service delivery, language services policy, access and equity obligations and innovation pilots. The TBSSC will be the ultimate body to decide the strategic policy related direction of TIS National based on Departmental needs at the time.

2.54 The Committee initially met in 2011 and did not meet again until August 2013, with two further meetings since, in November 2013 and July 2014. While the TBSSC was intended to be a high level strategic policy body, the attention of the committee has been at a more operational level, focusing on such issues as financial and business arrangements, interpreter logistical arrangements, interpreter conditions and information technology and telephony projects.

2.55 At the August 2013 meeting, the TBSSC considered a paper identifying a residual gap relating to the general policy guiding TIS National operations. The TBSSC was advised that:

... there remains a gap relating (to) the general policy guiding TIS National's operations and delivery of services. There are therefore a number of questions as to the nature of TIS National operations, whether it should operate independently as an "Office of Language Services", if its operations are consistent and supportive of the broader access and equity aims of government and how TIS National's interests can be best represented in discussion with the Minister's office.

2.56 The minutes of the August 2013 meeting reflect concern that 'no central policy ownership is in place for all TIS related issues' and a decision was taken for the director of TIS National to 'conduct consultations with relevant stakeholders over the next few months to prepare a paper for the next Steering Committee to recommend how this gap would be addressed'. However, prior to that meeting taking place machinery of government changes impacted on the department and TIS National. There was no further progress in clarifying

the Government's expectations of public sector interpreting services or how they might be delivered until December 2013, when responsibility for the fee free language services policy and program delivery was transferred to DSS.

2.57 In September 2014, the government tasked a joint DSS and DIBP Steering Committee with reviewing TIS National's administrative arrangements. The review is to assess the 'efficiency and cost effectiveness of the current arrangements, and whether the services provided by TIS National need to be undertaken within government, or could be more appropriately placed within the private sector or civil society'. The review is expected to be completed in mid-2015.

2.58 The resolution of TIS National's strategic direction is overdue. Necessarily, in determining the future scope of TIS National's services, consideration will need to be given to the costs, and benefits, of any changes to the current services. TIS National advised the ANAO that, for example, in relation to the interpreting services provided at DIBP's detention facilities and for the processing of refugee claims, any move to a service provider external to DIBP will mean a significant cost imposition for the department, potentially in the tens of millions of dollars.

Interpreting services and multicultural access and equity

2.59 Successive reviews of multicultural access and equity programs have noted that the lack of English competence was the principal obstacle preventing migrants from accessing services and information. An effective interpreting industry is, therefore, an essential component of providing equality of access to services for non-English speakers.

2.60 In recent years the Australian Government has given emphasis to the effectiveness of outcomes under the various multicultural access and equity policy frameworks. The access and equity policy aims to make all Australian government programs and services fair, easy to access, simple to use and responsive to the cultural and linguistic needs of Australia's diverse society. Part of TIS National's mission is 'to be Australia's premier access and equity choice for non-English speakers, interpreters, agency clients and staff in the provision of language services to the community'. It considers that it meets the multicultural access and equity objectives by providing:

- an immediate phone interpreting service 24 hours a day, every day of the year;

- free interpreting services to non-English speakers;
- free interpreting services to eligible agency clients;
- a range of interpreting service options to meet needs; and
- a range of informative publications and promotional materials about our services.⁴²

TIS National's services to DIBP and fee paying clients

2.61 The majority of interpreting services provided to DIBP facilitate the process of determining claims for refugee status. Most newly arrived asylum seekers have a limited capability in English and interpreters need to be present from the time they arrive in Australia until they are removed, returned or provided with temporary or permanent entry. Almost all the interactions asylum seekers have during that time with DIBP staff, medical services and other service providers involved in managing the various detention facilities will be with the assistance of an interpreter. Interpreters also assist in communicating with other clients, including those on bridging visas, newly arrived migrants and new and aspiring citizens.

2.62 In terms of services to fee paying clients, TIS National operates in a similar way to other interpreting service providers: it is a broker; matching interpreters with service needs (primarily for DIBP, but also for other users). On this basis, it competes in the open market for the provision of fee-based interpreting services.

2.63 A schedule of fees is available on TIS National's website. The schedule sets out the fees for telephone and on-site interpreting services during and after business hours. TIS National does not tender for business and there is no compulsion on the part of any Australian government entity to use the business unit for its interpreting needs. However, TIS National has service agreements with other government agencies, such as the Australian Taxation Office and Australian Federal Police, for the provision of interpreting services on a fee for service basis. Table 2.3 shows the top 10 fee paying organisations. Of these users, the Australian Taxation Office is the only Australian Government agency, three are non-government organisations (NGOs), three are utilities companies, two

42 Available from <<https://www.tisnational.gov.au/About-TIS-National/Access-and-Equity>>. [Accessed 13 February 2015.]

are telecommunications companies and one is a state government housing assistance agency.

Table 2.3: TIS National top 10 fee paying clients by \$ value (2013–14)

Organisation	Number of jobs	\$ value
Australian Taxation Office	65 671	2 747 652
Settlement Services International, Community Services Program ¹	43 063	1 645 331
Optus communications, consumer & customer service	24 210	1 365 650
Origin Energy/Country Energy	32 432	1 360 231
Australian Red Cross	25 735	1 092 119
NSW Family and Community Services Housing Contact Centre	28 251	993 297
Telstra Corporation	12 914	771 446
AGL Sales Pty Ltd	19 501	764 443
Energy Australia	15 806	733 765
Survivors of Torture and Trauma Assistance and Rehabilitation Service (STTARS)	5 918	661 272

Source: ANAO analysis of TIS National data.

Note 1: Settlement Services International is a leading not-for-profit organisation providing a range of services in the areas of humanitarian settlement, accommodation, asylum seeker assistance, foster care and disability support in NSW.

Fee free interpreting services

2.64 The Australian Government, through DSS, funds fee free telephone and on-site interpreting services for eligible non-English speakers accessing eligible services.⁴³ During 2013–14, \$15.8 million was allocated for the provision of fee free interpreting services, which are provided under a service level agreement between DSS and TIS National. Eligible service providers registered with TIS National include:

- private medical practitioners, providing Medicare-rebateable services;
- incorporated, not-for-profit, non-government, community-based organisations for casework and emergency services, where the

⁴³ Prior to October 2014, responsibility for the provision of fee free services resided with DIBP. Following machinery of government changes, responsibility for the management of the fee free program was transferred to DSS. The department maintains a service level agreement with DIBP for the supply of fee free interpreting services through TIS National.

organisation does not receive substantial government funding to provide these services;

- Members of Parliament for constituency purposes;
- local government authorities to communicate with non-English speaking permanent residents and Australian citizens;
- trade unions to respond to members' enquiries or requests; and
- pharmacies for the purpose of dispensing Pharmaceutical Benefits Scheme medications.

2.65 As at December 2014, 30 804 service providers were registered with TIS National for fee free interpreting services (summarised in Table 2.4).

Table 2.4: Number of fee free interpreting clients as at December 2014

Client category	Number of clients	Number of jobs
Medical practitioners ¹	29 137	115 578
Local government authorities	336	13 986
Parliamentarians	159	597
Trade unions	41	955
Non-Government Organisations	674	100 755
Other private sector entities (real estate agencies)	457	1136
Total	30 804	233 007

Source: TIS National data.

Note 1: Medical practitioners includes general practitioners, specialists and pharmacists.

2.66 Some fee free services are targeted at key service areas, such as the doctors' priority line. This service operates twenty-four hours a day, seven days a week. As seen from Table 2.4, there are over 29 000 medical practitioners registered with TIS National, including more than 6000 specialists. Pharmacies are another key service area, with free phone interpreting services available for the purpose of dispensing Pharmaceutical Benefits Scheme medications. DSS is currently trialling a real estate agencies pilot to assist non-English speakers to navigate the private residential property market, by providing agencies with access to free phone interpreting services through TIS National.⁴⁴

44 As at 11 December 2014, over 400 real estate agents had registered with TIS National to take part in the trial, which will run until June 2015.

2.67 Fee free services amount to approximately 12 per cent of total services provided by TIS National. In 2013–14, 233 007 fee free services were provided, averaging over 19 400 services per month.

Access to interpreting services

2.68 Facilitating access to interpreting services contributes to the achievement of the Government's access and equity policy objectives. Public sector agencies are free to choose how they provide interpreting services to their clients. While TIS National is one of the largest providers, there are other public sector interpreting providers at both national and state government levels. Those agencies with significant interpreting requirements have established their own interpreter panels, while other agencies invite tenders for service provision or employ interpreters on a case-by-case basis. Agencies with significant interpreting requirements, apart from DIBP, include Centrelink in the Department of Human Services and the NSW Community Relations Commission. There are also a number of state government interpreting service providers.⁴⁵

2.69 Whilst TIS National aims to be 'the premier access and equity choice for non-English speakers, interpreters, agency clients and staff in the provision of language services to the community', it does not measure or analyse the extent of its contribution to the achievement of access and equity objectives. Such an assessment is complicated by the fact that TIS National is one operator in an industry in which there are now many government and private operators. The relative contributions of all the different players, including TIS National, is not readily quantified. However, as discussed earlier, TIS National is presently the sole provider of fee free interpreting services, delivering more than 230 000 interpreting jobs in 2013–14. TIS National also delivers many other services, which also contribute to improving access to government services.

45 The Northern Territory Interpreting and Translating Service, Queensland Health Interpreter Service, South Australia's Interpreting and Translating Centre and the Victorian Interpreting and Translation Service.

Conclusion

2.70 TIS National has sound administrative arrangements to support the delivery of its interpreting services. There are also appropriate arrangements in place to progress key business improvement initiatives and to manage operational risks. TIS National collects considerable management information and uses this information to inform its service provision and track service standards. However, risk management arrangements would be strengthened by a more explicit focus on future IT infrastructure needs, including replacement of key systems, management of knowledge transfer and succession planning.

2.71 For many years, DIBP has characterised TIS National activities as 'cost recoverable'. However, key elements of the government's cost recovery guidelines have not been complied with. In addition, TIS National's cost recovery activities do not align with the criteria set out in the cost recovery guidelines.

2.72 TIS National is a long established provider of interpreting services, however, the entity's strategic direction has been uncertain for many years. The current review being undertaken jointly by DIBP and DSS, and the findings of the review undertaken in 2010, should provide a basis for resolution of TIS National's role and strategic direction. Once the government's priority policy objectives for the delivery of interpreting services have been resolved, it should be possible for DIBP and TIS National to further clarify and focus appropriate governance arrangements and business operations to underpin the delivery of interpreting services from within DIBP.

2.73 TIS National provides a range of services to DIBP, both within the detention network and to facilitate interaction with its clients in the community on a fee free and fee paying basis. While TIS National provides quality services, the extent to which these services contribute to the achievement of access and equity objectives is not monitored or assessed. The joint DSS/DIBP review announcement acknowledged that quality language services are an important part of the Government's commitment to access and equity. The requirement for the review to provide advice on government investment in the interpreting industry may usefully incorporate consideration of the extent to which TIS National contributes to the achievement of access and equity objectives, including whether TIS National should retain its current monopoly in the provision of fee free services.

3. Managing the Interpreter Workforce to Deliver Interpreting Services

This chapter examines TIS National's management of its interpreter workforce and strategies to deliver quality interpreting services.

Introduction

3.1 TIS National seeks to manage its interpreter workforce so that it can provide quality interpreting services to DIBP and other clients, within agreed service standards and on conditions acceptable to its registered interpreters and other service providers. While TIS National sits within DIBP, which is also its primary client, the service is responsible for the recruitment, management, pay and conditions of its contracted interpreters.

3.2 Within this context, the ANAO examined TIS National's management of its interpreter workforce, including recruitment and retention strategies and contractual arrangements. Workforce development strategies and the systems and processes in place to deliver quality interpreting services were also examined.

Management of the interpreter workforce

3.3 The escalating demand for interpreting services, combined with the changing profile of the language groups required as immigrant cohorts change, makes for a challenging workforce management environment. Further, the Australian interpreting industry is characterised by high levels of casual and part-time work and relatively low rates of pay. Interpreters are generally employed on a contractual basis and work casual hours through an interpreting agency or direct engagement by the client. According to the 2011 Australian Bureau of Statistics census, out of a total of 3349 interpreters, 2405 interpreters (72 per cent) worked 34 hours or fewer in the week preceding the census, with 43 per cent having worked fewer than 16 hours in the preceding week.⁴⁶ Professionals Australia estimates that, currently, the median wage is approximately \$30 000 a year, with the majority of interpreters earning less than

⁴⁶ ABS, catalogue number 6273.0: Employment in Culture, 2011. Table 8: Persons employed in cultural occupations by hours worked per week, 2011 (Released at 11.30am 20 December 2012).

70 per cent of their wage from one agency.⁴⁷ The exception are those interpreters who are deployed to DIBP's detention network, where pay rates are more generous and interpreters are able to work on a full-time basis (see Chapter 4).

Recruitment of interpreters

3.4 The major recruitment challenge for TIS National is the finite availability of interpreters and the long lead times for interpreters to be trained and/or accredited. While TIS National currently has almost 3000 interpreters registered with it, the total interpreter pool in Australia is estimated to be between 3300 and 5000 individuals.⁴⁸ Interpreters are often registered concurrently with a number of agencies.

3.5 TIS National recruits interpreters on an ongoing basis and, if they meet the necessary requirements of being Australian citizens or permanent residents, are available for full-time work and do not have an adverse criminal history, they are registered on its 'panel'. Preferably, interpreters will also be NAATI accredited⁴⁹, but even without formal qualifications (nil accredited⁵⁰) they are still able to register with TIS National. The more highly qualified interpreters are given preference in the allocation of jobs through TIS National's allocation policy.

3.6 In order to target its recruitment efforts to most effect within the limitations of the available workforce, TIS National systematically monitors and analyses client demand, by generating weekly interpreter recruitment reports. It also reports on the languages of highest demand in its monthly performance reports, allowing it to monitor changes in the demand for specific languages on a regular basis. These reports inform the list of recruitment priorities, including those for new and emerging languages. Figure 3.1 shows recruitment activity trends over the past 12 years, with a significant spike in 2009–10 continuing through to the present.

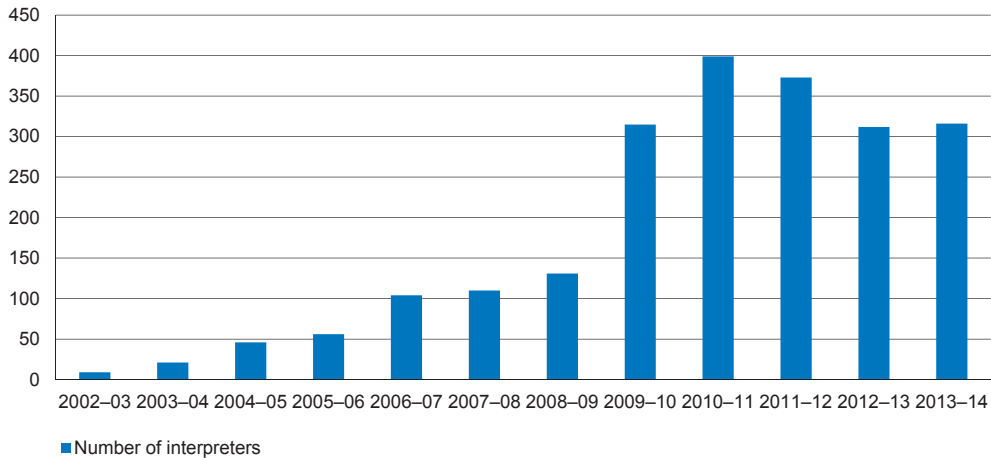
47 Association of Professional Engineers, Scientists and Managers Australia, *Lost in Translation: Barriers to building a sustainable interpreting industry in Australia*, 2012, p. 13.

48 The 2011 ABS census showed 3349 people identifying as interpreters. Professionals Australia estimates a figure up to 5000 individuals.

49 National Accreditation Authority for Translators and Interpreters. See Chapter 1.

50 Nil accredited is a term used by TIS National to refer to interpreters who do not hold NAATI accreditation.

Figure 3.1: Number of interpreters recruited by TIS National, 2002–03 to 2013–14



Source: ANAO analysis of TIS National data.

3.7 One of the mechanisms by which TIS National is able to tap into a wider pool of interpreters is through an arrangement with another major service provider. TIS National maintains a deed of standing offer with this agency, which sets out the rates of pay and conditions for the supply of interpreter services in the same way it has a deed of standing offer with its individual interpreters. In this way, TIS National is able to access a supplementary pool of interpreters when it is unable to supply the required interpreters and languages from its own panel.

3.8 TIS National has also undertaken targeted recruitment campaigns to recruit interpreters in new and emerging languages. Between 2009–10 and 2010–11, demand for both on-site and telephone interpreting increased rapidly and there was a need for interpreters in new and emerging languages for deployment to DIBP’s detention network. In response, during 2009–10, TIS National commenced a major recruitment drive, followed by a targeted campaign in 2010–11 for nil accredited Dari, Hazaragi and Persian (Farsi) interpreters to fill the demand by detention centres and to reduce TIS National’s reliance on the external service provider. In 2012, TIS National commenced a recruitment drive for nil accredited Tamil interpreters, again to meet the growing demand at DIBP’s detention network.

3.9 Table 3.1 shows analysis undertaken by DIBP in 2011, which highlights the effect of these targeted recruitment campaigns in increasing the number of interpreters registered with TIS National in specific languages.

Table 3.1: Number of interpreters recruited 2008 to 2010 by language

Language	Interpreters at Dec 2008	Interpreters at Dec 2009	Interpreters at Dec 2010	Increase 2008–2010
Arabic	111	140	154	43
Bengali	10	12	16	6
Dari	54	85	201	147
Farsi	62	77	107	45
Hazaragi	0	34	130	130
Hindi	27	32	38	11
Indonesian	22	28	31	9
Kurdish (Kurmanji)	12	12	16	4
Kurdish (Sorani)	3	11	36	33
Kurdish (Fayli)	0	0	22	22
Nepali	5	14	30	25
Pashtu	9	12	31	22
Rohingya	0	5	11	11
Sinhalese	15	27	35	20
Tamil	19	55	94	75
Urdu	16	22	35	19
Vietnamese	100	116	136	36

Source: DIBP data.

Interpreter Recruitment Strategy Project Plan

3.10 During 2013, TIS National drafted an Interpreter Recruitment Strategy Project Plan. The plan included the development of a recruitment analytics model, which aimed initially to define the sources of data to model projected language demand and subsequent interpreter recruitment activities. Subsequent activities included the development of an annual recruitment plan, including a communications plan, which would specify numbers of interpreters and languages required.

3.11 TIS National has advised the ANAO that the project has been put on hold due to other priorities and complex projects being delivered during 2014, but that it is intended to recommence the project in 2015. The success of the recruitment plan will depend on the rigour of the data collection and analysis, to underpin subsequent recruitment action. While the plan is currently in the preliminary stages, it could be a useful basis for targeting recruitment activity.

Employment conditions for interpreters

3.12 Interpreters registered with TIS National are engaged on a contractual basis to provide services when and as required. The relationship between the two parties is governed by a deed of standing offer (the deed), signed by interpreters upon their registration with TIS National. The deed sets out the remuneration arrangements for interpreters, including entitlements to superannuation, and indemnity and insurance arrangements.

Interpreter remuneration

3.13 The ANAO reviewed the arrangements of TIS National and four other Australian interpreting service providers, two public and two commercial enterprises.⁵¹ The differences between interpreting service providers in the way they structure their interpreter remuneration arrangements limits the extent to which accurate comparisons can be made. For example, for on-site interpreting jobs an interpreter is booked and paid for a minimum period of either 60, 90 or 120 minutes, depending on the provider. Rates also vary after the initial period has passed. After hours rates are a further point of difference, with providers generally paying higher rates for work taking place outside standard hours, although the definition of standard hours can vary.⁵²

3.14 Remuneration arrangements for telephone interpreting are more easily compared as most service providers stipulate a rate of pay for the first 15 minutes, and a different rate for the next period, which may vary from 60 seconds to 15 minutes. TIS National has the second lowest rate of pay for telephone interpreting, (\$8.85) for the first 15 minutes of interpreting during standard hours.⁵³

3.15 The issue of remuneration is a significant one for interpreters. The level of interpreting salaries and concerns about security of income has the potential to affect interpreters' recruitment and retention rates in an environment where the need for interpreters is increasing. The ANAO's discussions with interpreters indicated that the pay rates were generally perceived to be low. A survey undertaken in 2012 by Professionals Australia highlighted a number of

51 To protect the commercial confidentiality of these agencies, the details of the agencies' interpreter pay rates have not been outlined in the report.

52 'Standard hours' can mean 8.00 am–6.00 pm or from 7.00 am–7.00 pm, depending on the agency. A standard day also is also defined differently for interpreters on deployment.

53 Analysis undertaken in September 2014 of rates as at 1 July 2014.

areas of concern in relation to rates of pay, including incomes not keeping pace with inflation.⁵⁴

3.16 The ANAO's survey of the TIS National interpreter cohort explored remuneration arrangements.⁵⁵ The survey results showed:

- 547 of 704 respondents (almost 78 per cent) confirmed that interpreting was their primary source of income;
- of 373 respondents to the question about their preferred change to the deed of standing offer, 103 (27.6 per cent) mentioned increasing the rate of pay;
- however, of the 687 respondents to the question on whether they were well paid, 69 per cent expressed a positive or neutral view.

Accreditation based pay

3.17 Until recently, TIS National differed from other interpreting agencies in that it did not offer interpreters accreditation based pay. Three of the four agencies contacted by the ANAO currently pay interpreters for on-site jobs based on their accreditation level. That is, interpreters with professional level accreditation are paid a higher rate than those with professional/recognised credentials. Non-accredited interpreters are paid a lower rate than paraprofessional/recognised interpreters. Differential rates based on qualifications are less common for telephone interpreting work, with only one of the four agencies paying differential rates for telephone interpreting.

3.18 TIS National has estimated that, of the 3415 interpreter language skills registered (some interpreters have skills in more than one language) where accreditation is available, 27 per cent of its interpreters in those languages did not hold accreditation. Thirty-seven per cent of the interpreters in this cohort possessed either recognition level or paraprofessional accreditation, both of which are able to be upgraded.

3.19 A proposal to introduce accreditation based pay was considered and approved at the most recent TBSSC meeting⁵⁶, held in November 2014. The

54 The issues of concern were the lack of appropriate reward for the skills and experience required to provide quality interpreting services; rates failing to keep pace with the cost of living; perceptions of interpreters pay rates relative to other occupations; and the link between declining pay rates and loss of service quality.

55 The ANAO surveyed the interpreters on the TIS National mailing list as at 9 July 2014 (2853 individuals). The overall response rate was 25.5 per cent (730 individual responses).

new pay structure will take effect from the first pay period in 2015. The introduction of accreditation based pay is potentially an incentive for interpreters to increase their level of accreditation.

Delivery of quality interpreting services

3.20 It is important for DIBP and other clients to have a level of confidence in the quality of service provided by TIS National. The agency has adopted a range of measures to underpin the delivery of quality interpreting services, including giving emphasis to the appointment of interpreters with accreditation, and giving priority to accredited interpreters in allocating work.

3.21 The other measures include: the interpreter allocation policy; mystery shopper quality assurance program; professional development initiatives; and complaints and feedback processes.

NAATI accreditation

3.22 NAATI provides a level of assurance that interpreters are qualified. To obtain NAATI accreditation, a person must:

- pass a NAATI accreditation test;
- successfully complete a course of studies in translation and/or interpreting at an Australian institution as approved by NAATI;
- provide evidence of:
 - a specialised tertiary qualification in translation and/or interpreting obtained from an educational institution overseas;
 - a membership of a recognised international translating and/or interpreting professional association; or
 - advanced standing in translating or interpreting.

3.23 TIS National aims to deliver a quality interpreting service to its clients, and because it considers accreditation to be a ‘sound indicator of the interpreter’s skill, experience and professionalism’, it encourages interpreters to have accreditation at the professional level. TIS National’s annual business plan also highlights the importance of NAATI accreditation as an interpreting quality assurance tool. However, NAATI accreditation is limited to approximately

60 languages, while TIS National has registered interpreters in over 170 languages.

3.24 Until 2009–10, the key performance indicators (KPIs) for TIS National’s telephone and on-site interpreting services, as reported on in DIBP’s annual reports, included a measure for jobs performed by accredited interpreters. The relevant KPI for both telephone and on-site interpreting was ‘90 per cent of [telephone/on-site] interpreter jobs to be done by a NAATI accredited/recognised interpreter’. However, all KPIs for TIS National were removed from DIBP’s 2009–10 Portfolio Budget Statements (PBS) following a prolonged downwards trend in the percentage of accredited interpreters undertaking on-site jobs. The trend reflected the change in the refugee cohort and the inability to supply accredited interpreters in new and emerging languages.

3.25 DIBP’s more recent annual reports also provide a brief commentary on the percentage of on-site interpreting jobs undertaken by a NAATI-accredited interpreter although there are no equivalent figures reported for telephone interpreting. However, internally, TIS National systems record data showing services provided at each level of accreditation (Table 3.2). For example, in 2013–14, of the 81 250 on-site services provided, 65 878 of services (81.1 per cent) were provided by NAATI accredited interpreters and, of these, 78 per cent were provided by interpreters levels two and three. Of the 1 418 578 telephone interpreting services, 84 per cent were provided by interpreters levels two and three.

Table 3.2: Jobs by service type and accreditation level

NAATI accreditation level	Telephone interpreting services (by number and percentage)		On-site interpreting services (by number and percentage)	
	Number	Percentage	Number	Percentage
Nil int ¹	178 695	12.6	15 372	18.9
Recognised interpreter (level 1)	45 450	3.2	2301	2.8
Paraprofessional (level 2)	415 482	29.3	33 136	40.8
Professional interpreter (level 3)	775 876	54.7	30 260	37.3
Conference interpreter (level 4)	3023	0.2	179	0.2
Conference interpreter Senior (level 5)	52	0.0 ²	2	0.0 ²
Total	1 418 578	100	81 250	100

Source: TIS National data.

Note 1: 'Nil int' means not accredited at any level.

Note 2: Numbers are too small to return a percentage figure to one decimal point.

Interpreter allocation policy

3.26 As previously mentioned, TIS National's interpreter allocation policy is to offer interpreting work to the highest accredited interpreter available. The policy is primarily intended to ensure the most qualified available interpreter is assigned to a job. It also aims to discourage clients from requesting particular interpreters except in exceptional circumstances, such as, for example, where there is a need for continuity in torture and trauma cases or in cases of disability and domestic violence.

3.27 TIS National tracks the outcomes of the allocation policy through assessing the number of jobs completed by a NAATI accredited or recognised interpreter and documenting this in a monthly performance report. The monthly performance report provides the percentage of interpreters allocated that are NAATI accredited or recognised for each service channel. It also provides a descriptive analysis of any major trend changes by channel. For example, TIS National's monthly performance report for June 2014 shows that 84 per cent of on-site assignments and 77 per cent of telephone services were completed by a NAATI accredited or recognised interpreter, marginally down from 88 per cent and 78 per cent respectively recorded in May 2014.

3.28 TIS National's administrative arrangements for allocating jobs to interpreters can also mean that the most qualified interpreter may not get the job, although planned system enhancements are anticipated to improve the allocation outcomes. The current process gives priority to the interpreter available to take the call and accept the offer immediately, otherwise the next interpreter who is available will be offered the job. Interpreters expressed concern to the ANAO that this process means that they can miss out on assignments if they are unavailable for a short period of time, because by the time they call back the job has been offered to another interpreter further down the list. As a consequence of this policy the most qualified interpreter may have been passed over for the job because they were not able to answer the phone even though they may have been available to undertake the offered assignment.

3.29 The third and final phase of the TIS Online project, *Transact*⁵⁷, is intended to provide a more effective implementation of the interpreter allocation policy. Potential jobs will be listed by clients and these will only be able to be viewed by the highest level interpreters for a period of time, after which the next level of accredited interpreters will have access to the posting. Interpreters will be able to check the job offerings and accept those that are available and for which they are available and accredited. They will have 24 hours to accept the job online before the next level of interpreters is able to gain access to the job. Once *Transact* is operational, it may also provide an incentive for interpreters to become more qualified.

3.30 Ongoing monitoring of the number of jobs undertaken by accredited interpreters following the implementation of the *Transact* project would also enable TIS National to determine the effectiveness of the new technology in increasing the proportion of interpreting jobs undertaken by qualified interpreters.

Mystery shopper quality assurance program

3.31 Quality assurance can assist in determining the extent to which agency performance is meeting expectations or standards, as well as identifying procedures and practices that warrant improvement. TIS National has sought to improve the quality of its interpreting services through the introduction of a

57 The *Transact* phase of the TIS Online project is a client self-service booking and allocation system, that allows clients to log on and request an interpreter for on-site and pre-booked telephone interpreting assignments. The system also allows interpreters to log on to view and accept assignments.

mystery shopper program, which assesses the quality of its interpreting services on an ongoing basis.⁵⁸

3.32 In July 2011, TIS National established a six month mystery shopper pilot program to assess the quality of its interpreting service. The pilot was approved at an initial cost of \$240 000. The aim of the pilot was to design a program to determine the language proficiency and professionalism of interpreters engaged in telephone interpreting, as well as the client service skills of TIS National telephone operators.

Mystery shopper pilot program

Under the pilot program, bilingual actors placed calls to a DIBP service centre using a pre-determined suite of scripts that reflected common enquiries initiated by non-English speakers to DIBP. The mystery shoppers called TIS National speaking in their community language and the TIS National operator worked with the interpreter to identify the required agency. The interpreter and the mystery shopper were then transferred to the DIBP service centre. Upon conclusion of the call, the mystery shoppers rated both the operator and the interpreter against set criteria which focused on the quality of the client experience.

During the trial, up to 200 calls were recorded each month. These recordings were then assessed by examiners supplied by NAATI against the set criteria. During the first month of the pilot, the performance of interpreters in what were then TIS National's highest demand languages, Mandarin and Arabic, was assessed. Each month an additional language was added so that by the completion of the pilot program in November 2011, interpreter performance in Mandarin, Arabic, Vietnamese, Cantonese, Korean and Persian had been assessed. Dari has now been added to the languages included in the ongoing program.

3.33 The pilot program provided trend information and specific feedback about interpreters. Interpreters were assessed against two criteria: social and cultural factors, and ethics of the profession. Trend data showed that:

- Mandarin interpreters were consistently the highest performing language group, with the performance of Korean and Persian interpreters trending upwards throughout the pilot; while
- the performance of Arabic, Cantonese and Vietnamese interpreters was more variable.

3.34 The pilot program identified a range of issues for TIS National to address with interpreters. The issues included:

58 The program also assesses the customer service skills of TIS National operators in its contact centres. However, the discussion here is confined to interpreters.

- a tendency to summarise;
- a tendency to rely on knowledge from previous calls rather than active listening;
- the lack of ability to interpret specialist technical terms;
- providing additional information or advice not provided by the information officer;
- answering queries based on information previously gained without going back to the non-English speaker;
- providing a service in a noisy or otherwise inappropriate environment; and
- impatience or lack of courtesy towards the non-English speaker.

3.35 The mystery shopper quality assurance program has been a regular part of TIS National's operations since December 2012. The current program largely mirrors the pilot scheme, with an overall purpose of providing feedback to inform TIS National's assessment, coaching and development of its contact centre operator and interpreter base. On induction, interpreters are informed that the mystery shopper program is in place. Up to 140 calls per month are made, 20 in each designated language, and reported on.

3.36 TIS National receives monthly reports—a consolidated 'headline' report which provides key findings and overall trends across the seven languages in the program. In addition, individual reports for each of the seven languages in the program are produced.⁵⁹ The reports provide trend analysis specific to individual languages, that assist TIS National's management to identify language-specific quality issues requiring attention.⁶⁰ The findings in the reports are used in two ways—to contribute to one-on-one coaching sessions conducted by TIS National Interpreter Liaison Officers with assessed interpreters and through articles in the monthly interpreter newsletter, *Talking TIS*, that discuss general outcomes from the program used to provide all interpreters with pointers to improve the quality of services. The individual sessions also provide interpreters with constructive feedback on areas in which they can develop and

59 Mystery shopper evaluation reports are provided to the Global Manager Client Services; First Assistant Secretary, Visa and Offshore Services and TIS National management.

60 The reports score performance over five categories: ethics, accuracy, language use, delivery and interpersonal skills. The scores are then compared with a year-to-date average and areas of good performance and of concern are identified.

improve their skills and expertise. TIS National's assessment of the program is that it makes a major contribution to driving its quality agenda.

On-site mystery shopper program

3.37 During 2013, TIS National sought to expand its quality assurance program to on-site interpreting services by undertaking a pilot program in Mandarin and Arabic. The project was designed along similar lines to the telephone mystery shopping program, except assessed interactions were face-to-face. The pilot took place between October 2013 and March 2014, consisting of a total of 57 mystery shopper visits in total over a six month period: 29 in Arabic and 28 in Mandarin. While a report was prepared for the pilot, the sample sizes were small, rendering the results indicative only. In this context, for example, for the period January to March 2014, Arabic interpreters recorded a 79 per cent result for their interpreting skills, while the Mandarin interpreters recorded a result of 59 per cent.

3.38 Following conclusion of the on-site pilot, TIS National advised that it has no further plans to introduce a permanent on-site mystery shopping program, given the 'significant resourcing issues and difficulties with implementation'. The continuation of the program would have required the development of a fresh set of scenarios, given the possibility of an interpreter being selected for interview on a second occasion, the possibility of interpreters and mystery shoppers knowing each other, due to the small sample size and restricted location, and taking away Client Services supervisors from their day to day duties for over 20 minutes each time they were required to attend a mystery shopper interview.

Professional development for interpreters

3.39 TIS National has sought to raise the level of professionalism among its registered interpreters through funding a sponsorship and scholarship program, launched in May 2014, aimed at 'enhancing the professional capabilities of TIS National interpreters, predominantly in new and emerging, and high demand languages'.

3.40 The components of the program are the provision of scholarships for interpreters to undertake selected professional development short courses and the sponsorship of relevant events, and reimbursement of NAATI accreditation fees. Total funding for this activity for the 2014–15 financial year is \$229 999: \$79 999 towards development of a scholarships and sponsorships program and \$150 000 for reimbursement of NAATI accreditation fees. Since

the launch of the programme in May 2014, TIS National has received 200 applications for reimbursement of fees for professional development short courses and 31 applications for reimbursement of NAATI accreditation fees. TIS National is currently working with educational institutions to support the offering of scholarships and sponsorships to undertake selected professional development short courses particularly in the areas of mental health, torture and trauma, health and medical, and court interpreting.

Complaints management and feedback

3.41 TIS National's performance reports provide information about interpreters' performance as well as service delivery (see Chapter 2). One theme in the reports is the consistently high proportion of complaints relating to interpreter conduct and standard. While the reports do not clearly define the feedback categories, between November 2013 and July 2014, the percentage of total feedback relating to interpreter conduct or standard varied between 55 per cent and 83 per cent. In the January to June 2014 six monthly report, the 'interpreter misconduct' category had the highest number of negative items. Despite the consistently high proportion of negative feedback in relation to the standard and conduct of interpreters, TIS National's reports provide limited analysis of the content or causes of the negative results.

3.42 The high proportion of complaints relating to interpreter conduct is not necessarily an indication of overall poor conduct. The number of complaints and the proportion relating to interpreter conduct must be viewed in the context of the quantum of TIS National services. The number of negative feedback items from November 2013 until July 2014 averaged 14 per month. The numbers of services provided monthly by TIS National during 2013–14 averaged 6771 on-site services and 118 223 telephone interpreting services, meaning that, on average, around 0.01 per cent of services result in negative comments.

3.43 TIS National does not analyse the rates of negative and positive feedback vis-à-vis the number of jobs undertaken or minutes of interpreting. This means that TIS National does not clarify the proportion of negative and positive feedback when compared with total services supplied and whether feedback items, both positive and negative, are increasing or decreasing in relation to the number of services supplied.

Providing feedback to interpreters

3.44 In comments made in response to the ANAO's survey, interpreters expressed the desire for more regular and constructive performance feedback

from TIS National and DIBP. As one interpreter mentioned, 'regular feedback, whether positive or negative, would be appreciated, and would let me know on an ongoing basis areas I could improve on'. The ANAO survey showed that:

- nearly 70 per cent of interpreters (462 of 670 respondents) stated they had not received positive feedback from TIS National;
- 85 per cent (573 of 669 respondents) stated they had never received any feedback from TIS National; but
- five per cent of interpreters (35 of 666 respondents) stated they had received at least six-monthly feedback from TIS National on their performance.

3.45 Providing individual feedback to nearly 3000 interpreters on a regular basis would be difficult. However, it may be useful for TIS National to explore options, such as regular client surveys in relation to interpreter performance, to allow it to assess client satisfaction and to provide feedback to interpreters on a more regular basis, and, in particular, to those interpreters whose performance is not to the required standard. In this context, there would also be merit in TIS National monitoring trends in its share of the interpreting market, to provide further insight into client satisfaction with interpreter performance.

Conclusion

3.46 TIS National actively seeks to manage its interpreter capability. As there is a limited pool of interpreters within Australia, its recruitment effort is directed at understanding demand and developing strategies to attract interpreters to register with the agency. An agreement with another commercial agency provides TIS National with a contingent workforce when it is unable to meet the demand for its services. TIS National's remuneration arrangements for its interpreter workforce are broadly comparable with other industry participants. Finalisation of the planned recruitment strategy and introduction of accreditation based pay may assist TIS National to increase its number of accredited interpreters.

3.47 TIS National has a range of initiatives to underpin the delivery of quality interpreting services that include prioritising accredited interpreters in the allocation of jobs, reimbursement of NAATI fees, and support for professional development opportunities. The interpreting service is taking positive steps to continue to develop the expertise and competence of its interpreter workforce. However, there would also be merit in TIS National

being more proactive in its assessment of client satisfaction with interpreter performance, through, for example, client satisfaction surveys and providing regular feedback (both positive and negative) to its interpreters.

3.48 The mystery shopper quality assurance program means TIS National is able to identify areas in its delivery of telephone interpreting services that require attention in a timely manner. Further, the program allows TIS National to recognise areas of improvement and/or quality in performance.

3.49 While complaints about interpreters' conduct and standard of interpreting comprise the largest proportion of feedback received by TIS National, it does not analyse its complaints data to provide more meaningful management information. Presentation of the complaints data in the context of the quantum of services delivered, for example by analysing the number of jobs, minutes of interpreting delivered and the number of interpreters subject to complaint, and the numbers of interpreters who worked over the relevant period, would provide a more informative picture of the performance of TIS National's interpreters.

4. Deploying Interpreters to Detention Facilities

This chapter examines the Department of Immigration and Border Protection's management of the deployment of interpreters to the immigration detention facility network. The department's work health and safety obligations to interpreters working in this environment are also discussed.

Introduction

4.1 Interpreters are an essential element in the effective management and processing of irregular maritime arrivals (IMA) at immigration detention facilities (IDFs). The activities undertaken include the initial processing of boat arrivals (arrival interviews), case management work, medical appointments, security interviews, pre-transfer assessments and protection visa interviews. Non-DIBP stakeholders within the detention facilities, particularly health and detention service providers, also use interpreters to communicate with detainees.

4.2 The DIBP detention network comprises approximately a dozen facilities, characterised as follows:

- regional (offshore) (Nauru and Manus Island);
- remote (Christmas Island and Curtin⁶¹);
- rural (Yongah Hill); or
- urban (Brisbane, Darwin, Sydney, Melbourne, Adelaide and Perth).

4.3 The provision of interpreting services to DIBP's detention network is TIS National's priority activity, and in 2013–14 cost DIBP \$83.3 million.

4.4 The ANAO examined DIBP's management of the deployment of interpreters to IDFs. The work health and safety obligations to workers, including interpreters, deployed to immigration detention facilities were also examined.

61 Curtin is scheduled to close in the near future.

Deployment of interpreters to IDFs

4.5 The deployment of interpreters to IDFs is a shared responsibility of DIBP's detention operations area and TIS National. Deployment activity includes:

- strategic planning to supply the correct numbers of interpreters in the languages required to the network (Planning and Programming Branch);
- pre-deployment preparation (briefing, logistics and medical requirements) (TIS National); and
- management of interpreters while deployed to the network (shared responsibility).

Strategic planning

4.6 The Planning and Programming Branch in DIBP's National Office is responsible for: planning interpreter distribution across the network; decisions about interpreter numbers at each centre; and interpreter allocation priorities between IDF sites. DIBP also liaises with TIS National on issues of interpreter policy and planning for the department's interpreter requirements and provides some oversight of interpreters while they are in the detention network.

Determination of interpreter numbers for the network

4.7 DIBP advised that interpreter numbers for IDFs are driven by demand, detainee demographics, detainee movements and activities at each site. The department uses interpreter allocation ratios, that is the ratio of interpreters to detainees in language groups, to inform allocations of interpreters and to measure trends in the allocation of interpreters to IDFs. For example, at one point in Inverbrackie a ratio of one interpreter to 40 detainees was actively used and interpreter ratios were tracked in Darwin for planning purposes. However, these ratios have not been formalised. Where no status determination⁶² is taking place⁶³, a ratio of between 1:30 and 1:50 interpreters to detainees is considered a 'possible yardstick' according to the Status Resolution Services Division's (SRSD) monthly performance reports. Current DIBP policy is

62 'Status determination' is the processing of an application for refugee status.

63 Where detainees are being held pending the commencement of processing, pending appeals or because their status has been resolved and they either cannot be returned immediately to their country of origin or they cannot be released into the community.

for interpreter usage to be reviewed in comparison to caseload and language group to ensure that there is an adequate coverage of languages without an oversupply of interpreters at any IDF or offshore processing centre (OPC).

4.8 DIBP determines interpreter numbers required at each detention centre on an ongoing basis. Requests⁶⁴ from interpreter coordinators⁶⁵ within the network provide the basis for the allocation of interpreters. The Planning and Programming Branch decides how many interpreters (and for what language) are deployed to each facility on the basis of these requests and an assessment of current activity levels in each of the facilities. DIBP then sends the relevant requests to TIS National. Table 4.1 sets out the numbers of interpreters in the network and the languages most in demand in 2013–14.

Table 4.1: Numbers of interpreters in the detention network and languages in demand in 2013–14

Interpreters in the network	Numbers
Number of interpreters deployed to the network during 2013–14 (total)	2064
Average number of interpreters deployed to the network during 2013–14 (monthly)	256
Number of interpreters in the network at 28 November 2014 (total)	236
Languages in demand	Percentages
Languages in highest demand in the network during 2013–14	Farsi (Persian) (26%), Tamil (14%), Arabic (11%), Vietnamese (8%), Mandarin (8%), Rohingya (6%), Hazaragi (6%), Somali (3%), Pashtu (3%), Indonesian (2%), Other (14%) ¹
Languages in demand	Percentages
Languages in demand in the network as at 28 November 2014	Farsi (Persian) (28%), Arabic (14%), Tamil (11%), Rohingya (9%), Pashtu (8%), Hazaragi (8%), Somali (4%), Vietnamese (4%), Bengali (3%), Other (11%) ²

Source: TIS National Annual Performance Report 2013–14 and TIS National data.

Notes 1 and 2: Figures do not add up to 100 per cent due to rounding.

64 Until towards the end of 2014, requests were being received on a daily basis but became less frequent due to the greater stability in the detention network.

65 Interpreter coordinators manage interpreter schedules, including ad hoc requests for interpreters and act as a central liaison point for interpreters.

Planning for interpreter deployments

4.9 Interpreter allocation is a critical element in the provision of interpreter services. Under allocating interpreters to a facility will mean delays in processing of claims for refugee status or in the other critical activities that take place in detention facilities, including undertaking health assessments and developing treatment plans. Over allocating interpreters means that DIBP is incurring additional expenses in having a costly resource underemployed for a period of four to eight weeks. The more effectively the Programming and Planning Branch is able to target the deployment of interpreters to the individual facilities, the more efficient is the deployment program.

4.10 Following concern over the potential for an over allocation of interpreters to parts of the detention network, DIBP has sought to target interpreter allocations more effectively to reduce the time that interpreters were not formally engaged in interpreting activity. The SRSD's performance report for the final quarter of 2013–14 notes that:

Spending rates reduced from an average of \$9.6m per month in Jul-Sep 2013 and to an average of \$5.4m per month in Apr-Jun 2014. Based on the demand-driven allocation, this was \$400k within allocation in Apr-Jun 2014 for the number of detainees in the network based on an interpreter to detainee ratio of approximately 1:40.

4.11 The reduction in the numbers of detainees, combined with less activity⁶⁶ generally in the IDF network, has resulted in a reduction in the department's monthly expenditure on interpreters. However, the department has not assessed the potential contribution to this reduced expenditure of the more efficient allocation of interpreters.

4.12 Monthly performance reports provide detailed information on detention operations, including the deployment of interpreters. The reports contain information on:

- the ratios of onshore and offshore detainees per interpreter;
- total funds expended on interpreter services; and

⁶⁶ The cessation of onshore processing means there are fewer interviews taking place between detainees and DIBP case management staff. Because there are fewer arrivals on Christmas Island, there are fewer internal transfers taking place.

- monthly interpreter expenditure—onshore, offshore and total expenditure.

4.13 For example, the report for the March 2014 quarter showed the following variations in interpreter to detainee ratios:

- the number of onshore detainees per interpreter varied from almost 32:1 in July 2013 to a peak of 39:1 in January 2014, decreasing to 34:1 in March 2014; and
- the number of offshore detainees per interpreter ranged from 10:1 in July 2013 to a peak of almost 30:1 in January 2014, decreasing to 20:1 in March 2014.

4.14 SRSD performance reports supply critical data about the deployment of interpreters around the network. This type of data informs the department about trends, including movements in interpreter demand, onshore and offshore, and cost attributions for onshore and offshore interpreter provision. However, decisions on the allocation of interpreters on a day-to-day basis require ongoing liaison with the interpreter coordinators⁶⁷ for an assessment of the detainee cohort (numbers of detainees in each language group) and the types of activities taking place within individual centres. For example, whether or not detainees are being actively processed to determine their refugee status is a significant factor, as is the number and length of mental health interviews individual detainees require. Further, a reduction in absolute numbers does not mean that the numbers of interpreters required to be deployed reduces correspondingly. Where language needs vary and numbers are small, a base number of interpreters will continue to be needed.

The costs of deploying interpreters

4.15 Interpreters are paid according to the IMA on-site interpreting assignments schedule attached to the deed of standing offer. There is a percentage loading of between 15 and 30 per cent, depending on the categorisation of the facility. Travel to the facility and accommodation at or near the facility is either paid for or provided by DIBP. While on deployment, the deed of standing offer provides for interpreters to be paid for a seven day week, including for a scheduled day off, depending on operational requirements.

67 Interpreter coordinators manage the delivery of the interpreting function in a detention facility. They are employed within the Detention Operations Division.

4.16 The costs of deploying interpreters to detention facilities is high. Costs include travel to and from the detention facility from the interpreter's home base, taxi fares to and from airports, accommodation, salaries and allowances. Most facilities are in remote locations and most interpreters are in the southern capitals, making travel costs significant. For example, Table 4.2 shows that the cost of deploying one interpreter to Darwin, excluding airfares, amounts to \$7186 per week (as at March 2014). The average number of interpreters deployed to Darwin from July 2013 to March 2014 was 43 interpreters⁶⁸, at a total cost of approximately \$308 998 per week.

Table 4.2: Costs of deployment (Darwin)

	Week day (\$)	Weekend (\$)
Full day rate	659.5	1058.4
Travel allowance	113.1	113.1
Accommodation	140.0	140.0
Total	912.6	1311.5

Source: DIBP data.

4.17 DIBP's internal reporting shows that monthly expenditure on interpreters for the detention network has fallen from an average of \$9.6 million per month in July to September 2013 (a peak of \$11.0 million per month in August 2013) to \$5.4 million per month in April to June 2014. As can be seen from Table 4.3, the quarterly cost of providing interpreters to onshore facilities was \$11.3 million, and \$8.3 million to offshore facilities. While costs per interpreter are almost identical for the two different types of facilities, costs per detainee are significantly higher in the offshore processing centres: costs per detainee are \$824.5 onshore and \$1413.0 offshore, while costs per interpreter are just over \$30 700 for both onshore and offshore facilities. This analysis indicates that a detainee in an offshore facility requires significantly more support from interpreting services than a detainee in an onshore facility. DIBP advised that this result can be partially attributed to the fact that detainees in offshore processing centres are having their refugee claims assessed while those in onshore facilities are not. A greater need for health services might also be a factor.

68 Averaged over nine months from DIBP data.

**Table 4.3: DIBP expenditure on interpreting services
January–March 2014**

	Onshore	Offshore
Number of detainees	13 705	5874
Number of interpreters	368	270
Number of detainees per interpreter	37	22
Total spend for the quarter (\$million)	11.3	8.3
Cost per detainee	824.5	1413.0
Cost per interpreter	30 706.5	30 740.7

Source: ANAO analysis of DIBP SRSD performance report March 2014.

Preparation of interpreters for deployment

4.18 Prior to deploying interpreters to remote and offshore facilities, TIS National provides information to interpreters initially via telephone and then by email. Once an interpreter has accepted an offer of deployment, TIS National orally advises them of the general details of the deployment⁶⁹, with follow up written material being provided prior to departure for the deployment. This material includes booking details, travel itinerary and accommodation information, a TIS National timesheet, a statement of departmental expectations of interpreters and a DIBP prepared pre-deployment brief, which includes information specific to the location to which the interpreter is being deployed.

4.19 Notwithstanding this preparation, only 151 of the 311 respondents to a question on preparation for deployment in the ANAO survey of interpreters, felt that the information provided by TIS National prepared them fully, while 134 respondents advised that the information prepared them partially and 26 respondents that the information did not prepare them at all. During face to face discussions⁷⁰, the interpreters advised the ANAO that the information provided by TIS National and DIBP did not prepare them sufficiently, especially if it was their first deployment.

69 TIS National's oral advice covers such matters as: accommodation and other facilities (cooking and bathroom arrangements), internet and telephone access; dates of travel and working arrangements; whether they need a current Australian passport; the requirement for a visa to work on Manus Island; and the necessary vaccinations for the deployment.

70 The audit team held face to face discussions with interpreters at Melbourne Immigration Transit Accommodation, Wickham Point and Blaydin detention facilities.

4.20 In general, the ANAO's assessment of the site specific written material provided by DIBP is that it is reasonably comprehensive, although the currency of the material was not obvious. Documents were not dated and appeared to have been originally prepared at various dates, from January and November 2013 to January and July 2014. It is possible that the range of material provided to the ANAO was not available to the interpreters interviewed by the ANAO earlier in the year and deployed to other sites prior to that time.

Management of interpreters on deployment

4.21 The management of interpreters during their deployment has been an evolving challenge for DIBP and TIS National. Deployment to detention facilities, both onshore and offshore is a challenge for all staff, not just interpreters. However, as contractors engaged by TIS National, DIBP should have appropriate arrangements in place to support the wellbeing of interpreters and to address their legitimate concerns.

Interpreter concerns

4.22 During the period between 2010–12⁷¹, when boat arrivals were increasing rapidly and interpreter resources were stretched, interpreters began to raise concerns with DIBP about their deployment experience. These concerns centred around issues such as accommodation, travel time and access to vehicles for social, medical and retail purposes, professional standards, including how DIBP staff and service providers were using interpreters and matters relating to pay and conditions, including simplification of the deed of standing offer and problems with receiving incorrect payment.⁷²

4.23 The standard of accommodation provided to interpreters at Christmas Island, Curtin and Nauru in particular, but also Darwin has been the source of much concern, stemming partly from a perceived lack of response from the department in dealing with accommodation issues. DIBP advised that the accommodation guidelines prioritise the allocation of accommodation by length of deployment where, generally speaking, the longer the potential deployment the better the accommodation allocated. However, this necessarily

71 DIBP experienced 'surge' periods over the period 2011–13, during which times, because of the number of boat arrivals on Christmas Island, all staffing resources were stretched, including interpreters, DIBP and service provider staff.

72 These issues are much the same as those raised with the DIBP/TIS team which visited Darwin, Curtin and Christmas Island in mid-2012 discussed in paragraph 4.25.

means that interpreters will generally be allocated less desirable accommodation because their deployments, initially around four weeks, are typically shorter than DIBP staff and other contractors. Recently interpreters in Darwin were relocated to the same accommodation as DIBP staff.

4.24 One of the major issues raised by interpreters in the ANAO survey was the perceived lack of consistency in accommodation and security arrangements at individual centres.⁷³ This concern was reflected in DIBP's July 2014 survey of interpreters who had experienced deployment to a detention facility during the previous 12 months. In particular, in response to the question *'Is there anything that would improve the work health and safety for interpreters at IDFs and OPCs'*, over 44 per cent of respondents recommended improvements to accommodation and a separate room for interpreter use between appointments, as well as a safer area for interpreters to wait on Manus OPC.

4.25 Previously, in response to the interpreters' concerns, in mid-2012, a senior DIBP executive and the TIS National Director travelled to Curtin, Darwin and Christmas Island detention facilities for discussions with interpreters and to gain a better understanding of the problems being experienced by interpreters on deployment. DIBP and TIS National drew up an action plan and commenced putting in place strategies for more effectively managing interpreters while on deployment. These strategies are still being implemented and include:

- development of an escalation protocol to resolve issues where the interpreter coordinator was unable to do so;
- a formal feedback mechanism; and
- the implementation of regular group meetings of interpreters, managed and minuted by the interpreter coordinator.

4.26 The management of interpreters while on deployment is partly the responsibility of the interpreter coordinator and partly of TIS National. Management arrangements include interpreter meetings for disseminating information, providing complaints and feedback mechanisms for interpreters during and post deployment, and the performance management of interpreters. The interpreter coordinator has a role in each of these activities.

73 For example, not all centres have an adequate 'interpreter room' in an appropriate location, where interpreters can wait and prepare between appointments, and where service providers and DIBP can locate them for ad hoc interpreting requirements.

The role of the interpreter coordinator

4.27 The responsibility for coordinating interpreting services in a detention facility lies with the interpreter coordinator, a DIBP employee within the Detention Operations Division. This responsibility primarily focuses on liaising with service providers (predominantly facilities management and health services) and scheduling interpreters. Interpreter coordinators are also the central liaison point for IMA interpreters in National Office, as well as managing feedback relating to interpreter performance and responding to any issues interpreters may be experiencing on-site.

4.28 Interpreter coordinators are appointed at a range of levels, depending on the facility. The pre-deployment preparation and training of interpreter coordinators includes an e-learning module, which must be completed by all interpreter coordinators prior to taking up their position. DIBP recognises that newly appointed interpreter coordinators are not always aware of their responsibilities. Often there is a time lag between training and deployment, DIBP has considered placing the interpreter coordinator with the IMA deployment team and TIS National prior to deployment. This initiative has not yet been implemented.

4.29 The ANAO also notes that, in February 2014, the IMA liaison team in DIBP commenced teleconferences with interpreter coordinators in the facilities to share information about movements around the network, interpreter issues, feedback avenues, infrastructure and facilities. A TIS National representative participates in the teleconferences. These meetings are an important mechanism for DIBP to communicate with interpreter coordinators but the frequency of these meetings is not consistent.

Interpreter meetings

4.30 During their deployment, interpreters and coordinators are required to have regular group meetings, as set out in the Interpreter Detention Operations Procedure (DOP).⁷⁴ The meetings are to enable an exchange of information, with coordinators providing interpreters with information updates and general feedback and interpreters raising any issues of concern. The procedures require minutes of the discussion and agreed outcomes to be

74 The current version was updated on 1 July 2014, but interpreter meetings have been required since 2011.

recorded, forwarded to IMA interpreters section and, as at 1 July 2014, copies provided to TIS National.

4.31 DIBP, in its Interpreter Review Action Plan 2013, noted that not all IDFs were conducting these meetings. The ANAO analysed the minutes from 76 meetings from across eight facilities over the period July 2012 to January 2014. The ANAO's analysis confirmed that interpreter meetings did not take place regularly around the network and/or minutes were not always taken.⁷⁵ While copies of some minutes were forwarded to the IMA interpreters section in National Office, the department did not monitor receipt of the minutes, nor did it track issues raised and their resolution. When contacted in late November 2014, TIS National had no knowledge of the requirement that it was to be provided with copies of the minutes and it had not received the minutes of any interpreter meetings to date.⁷⁶

4.32 However, analysis of the interpreter meeting minutes available also demonstrates that, in some centres, there was a genuine degree of cooperation and respect between DIBP and the interpreters. This partnership is reflected in DIBP's responsiveness to interpreter concerns locally and the efforts made by the interpreters to facilitate the activities at the centre. At other centres, the interpreter meeting minutes reflect the instructions and advice about facility operations given to interpreters but do not report concerns raised by the interpreters and actions to be taken to address these concerns.

Resolution of concerns during deployment

4.33 In July 2014, TIS National, in consultation with DIBP, developed an escalation protocol for dealing with interpreter complaints beyond the interpreter coordinator, made by interpreters while on deployment at IDFs. While detention procedures provide for the interpreter coordinator to be the first point of contact for any issues or concerns, if the matter has not been resolved within five days, interpreters can escalate the matter to the IDF manager and/or TIS National. If interpreters require supplementary

75 For example, the ANAO identified four sets of minutes for meetings held in Darwin and the agenda for nine meetings, only one of which was minuted. Meetings commenced in July 2012 at Curtin, Inverbrackie, Leonora and Christmas Island, but the frequency of the meetings and recording of minutes is variable. For example, there are minutes for five meetings at Curtin in 2012, one in 2013 and meetings re-commenced in January 2014. At Inverbrackie, meetings were held regularly (fortnightly) from July 2012 until May 2013.

76 Staff in TIS National had not been made aware of the latest version of the DOP and were still working from the April 2013 version, instead of the 1 July 2014 version. Notification of the revision was not communicated to the operational staff in TIS National.

guidance or assistance while they are on-site that cannot be resolved by the coordinator, TIS National has an IMA Interpreter Liaison Officer available to them. DIBP has not been able to provide data on the implementation date of the escalation protocol, the frequency of use of the protocol, the range of issues raised and how they were resolved.

Feedback from interpreters

4.34 DIBP is in the process of introducing a formal feedback mechanism for interpreters at the conclusion of their deployment to inform the department of any issues which may require further attention. This feedback mechanism was developed during mid-2014, following TIS National and DIBP identifying the need to develop an avenue for feedback from interpreters at IDFs to DIBP in mid-June 2012. The process requires the interpreter and the coordinator to complete a one page feedback form together, which the coordinator forwards to TIS National and the IDF manager. To date the feedback form has not yet been finalised.

Performance management of interpreters

4.35 DIBP's detention procedures provide for managing the work performance and behaviour of interpreters while on deployment. Interpreters are required to adhere to the AUSIT Code of Ethics and also, as for all other employees, the local procedures in each of the facilities. It is important that DIBP is mindful of interpreters' performance in particular, given that poor interpreting on their behalf can impact on a client's application for refugee status.

4.36 The interpreter coordinator is expected to address less serious matters, such as inappropriate dress, not speaking in the first person in interviews, or rudeness. Detention procedures recommends that this be done either on an individual basis or in group situations, such as interpreter meetings, where a general discussion may take place. DIBP's procedures provide for an escalation process for more serious breaches, but the DIBP document does not define what a serious breach is, nor does it give examples. The interpreter coordinator or facility manager must afford the interpreter procedural fairness when investigating allegations of serious breaches. In this context, the relative responsibilities of the interpreter coordinator and TIS National in the performance management of interpreters are not clear, to DIBP staff, TIS National and the interpreters. However, for such matters as termination of a deployment for a breach of the Code of Ethics, a last resort, termination action

is normally only taken following consultation between the Planning and Programming Branch and TIS National.⁷⁷

Work health and safety in the detention environment

4.37 DIBP's detention facilities are most often located in remote and offshore places with few local amenities and limited accommodation and services. The facilities are not easily accessible and aspects of life in places such as Nauru, Manus Island and Christmas Island can be challenging and hazardous. For these reasons, work health and safety matters have a heightened importance for all workers, including interpreters.

4.38 Interpreters work in a variety of situations in the DIBP detention network, with the majority of their work spent interpreting in interviews for the determination of refugee status and for medical and mental health appointments. The work is intensive, intellectually demanding, and at least six days a week for the period of deployment, which can be from four to eight weeks.⁷⁸

The application of the work health and safety legislative framework to DIBP and interpreters

4.39 Moves to harmonise the Australian work health and safety (WHS) framework resulted in amended legislation being adopted in most jurisdictions throughout Australia and taking effect for Commonwealth agencies from 1 January 2012. Key features of the WHS framework are set out below.

77 In the period 1 April 2013 until 22 May 2014, 13 interpreters had their deployments terminated for code of conduct breaches.

78 Interpreters are initially deployed for a period of four weeks and then, if necessary and appropriate, extended for a further period of four weeks. Deployments to Manus Island are limited to four weeks only, because of visa restrictions.

The Work Health and Safety Act 2011

The aim of the legislation was to provide all workers in Australia with the same standard of health and safety protection regardless of the work they do or where they work. Two important principles of the legislation in relation to immigration deployment are:

- workers and other persons should be given the highest level of protection against harm to their health, safety and welfare from hazards and risks arising from work as is reasonably practicable; and
- health includes psychological health as well as physical health.

Reasonably practicable is also a key concept in the principles. In determining what is reasonably practicable, the following matters need to be considered:

- the likelihood of a hazard or risk occurring;
- the degree of harm that might result if the hazard or risk occurred;
- what the person concerned knows about the hazard or risk;
- the availability of suitable ways to eliminate or minimise the hazard or risk; and
- the cost of eliminating or minimising the hazard or risk.

The duty of care of a person conducting a business or undertaking (PCBU) requires the PCBU to:

- provide a working environment that is safe and without risks to health, including safe access to and exit from the workplace;
- provide adequate facilities for the welfare of workers at work;
- provide information, instruction, training or supervision to workers needed for them to work without risks to their health and safety;
- monitor the health of workers and the conditions of the workplace; and
- maintain accommodation owned or under their management and control to ensure the health and safety of workers occupying the premises.

Source: Guide to the Model Work Health and Safety Act, p. 7.

4.40 DIBP, as an entity of the Australian Government, is a person conducting a business or undertaking (PCBU) for the purposes of the Act. The legislation has extra-territorial application and also applies to persons other than direct employees, that is contractors and others undertaking work for DIBP or on DIBP premises. This means that the legislation applies to DIBP and, through the

definition of the term ‘worker’⁷⁹, covers interpreters working in the detention network, whether in onshore or offshore processing centres.

4.41 Detention facilities are shared workplaces, managed by an independent contractor and within which other services are provided by specialist agencies. DIBP has an overarching duty of care and a duty under the Act to consult and cooperate or coordinate with every other person who has a duty⁸⁰ in relation to the same matter, such as its service providers. The department has the same duty of care responsibilities for offshore facilities, with the added complication that it must cooperate with foreign governments (Papua New Guinea and Nauru), that have no responsibility under Australia’s WHS legislation, and where workplace standards may not equate to Australian standards.

4.42 There is also a requirement in the legislation for consultation that requires the department to share information, give workers the chance to express their views, ask questions and contribute to the decision making process. To give effect to the consultation requirement, the department uses the WHS consultative mechanisms it already has in place within the network. These mechanisms include a system of work health and safety committees in the department and all detention facilities, and work health and safety representatives throughout the department.

Identification of risks and mitigation strategies

4.43 Following the introduction of the new legislation and increased activity in offshore processing centres, DIBP reviewed support arrangements for employees and workers. The result was the development of mechanisms to identify risks to personnel deployed to IDFs, including interpreters, and mitigation strategies to support workers when deployed throughout the network.

Mechanisms for identifying risk

4.44 The most significant mechanisms employed by DIBP for identifying risks in the detention facilities include:

- the establishment of a committee structure to identify WHS risks;

79 A person is a worker if the person carries out work in any capacity for a person conducting a business or undertaking, including work as (a) an employee; or (b) a contractor or subcontractor.

80 Persons with duties under the Act include service providers who manage and provide services within immigration detention facilities.

- annual WHS surveys of workers who have been deployed over the previous 12 months; and
- IDF environmental scans, including site visits, usually undertaken on an annual basis.

4.45 DIBP requires WHS committees to be established in each IDF and OPC, and to include representation from the contracted facilities managers (Serco or Transfield), DIBP and from other contracted service providers. DIBP advised that these committees are its primary means of employee consultation. However, membership does not include representation from the interpreter cohort. DIBP considers that, as interpreters are contractors they are represented by the department at the meetings. However, the ANAO notes that other contractors, for example International Health and Medical Services (IHMS), are members of these committees. DIBP advised that the standard procedure is for WHS issues raised by interpreters to be dealt with by the team supervisor or team leader and, where necessary, escalated to the WHS committee and or centre manager pending the type of issue being raised.

4.46 Analysis of the minutes of WHS meetings over the last 12 months indicates that work health and safety matters raised by interpreters at their weekly meetings are not routinely raised with the work health and safety committees in the individual facilities. For example, the minutes of the Christmas Island WHS meetings reflect provision in the agenda for the raising of WHS issues by detainees but there is no corresponding item for issues to be raised by interpreters. There is also acknowledgement in the other minutes of the need to involve all stakeholders in WHS matters. To facilitate the process, DIBP could require that a dedicated agenda item for WHS matters raised at interpreter meetings form part of the standard WHS agenda at all detention facilities.

4.47 DIBP introduced annual IDF surveys for its staff in 2012. In 2013, issues such as a lack of familiarity with the Employee Assistance Program (EAP) program, lack of knowledge about notifiable incidents and a lack of awareness of WHS instructions for those working at IDFs, were identified through the survey and an action plan was developed in response. In 2014, the 750 interpreters who had been on deployment during the previous 12 month period were also surveyed, with 242 responses from interpreters being

received.⁸¹ In the survey, DIBP sought responses from interpreters in relation to general work health and safety matters, particularly in relation to personal security while on deployment, bullying and harassment and other policy and procedural matters, improvements to work health and safety while on deployment, and health and wellbeing support.

4.48 DIBP also conducts environmental scans at IDFs on an annual basis to review WHS practices and management at each facility. The environmental scans have been developed in conjunction with Comcare and are aimed at assisting the department in reducing injuries, illnesses and/or incidents. During 2013–14, the department conducted inspections at Villawood, Christmas Island, Yongah Hill, Pontville and Melbourne immigration transit facilities. Issues such as client aggression, security arrangements, induction procedures, personal security, incident reporting and WHS reporting were among those identified in the July 2013 to June 2014 environmental scan visits. In 2013, an action plan was prepared, that identified five concerns across all facilities. These included:

- a low level of awareness of the EAP scheme;
- low participation rates in EAP inductions and exit interviews;
- insufficient compliance with security protocols and awareness of the *National OHS Instructions for Workers Working at IDFs*;
- staff not being aware of designated smoking areas; and
- lack of knowledge about the requirements to lodge notifiable incidents to Comcare.

4.49 Remedial action is identified in the plan. In most of the cases, actions amounted to monitoring of relevant activities, revision of training material and enhanced communications strategies. However, the plan does not specify timeframes for completion of corrective action.

4.50 The department would benefit from developing a better reporting mechanism after undertaking environmental scans of detention facilities. Such a mechanism could provide details by facility of any shortcomings in work health safety procedures identified during the environmental scans, and set out an improved process for corrective action, including nominating timeframes for

81 DIBP advised that, at the time of the survey, 250 of the interpreters surveyed were on deployment and may not have been able to respond to the survey because of the unavailability of the internet.

undertaking individual actions, responsible officers and a mechanism for identifying and reporting on actions that have been finalised.

Comcare assessment of detention facilities

4.51 Comcare conducts, at its own instigation, liaison inspections with PCBUs to share knowledge, learn the working environment and liaise with management, workers and health and safety representatives. While the Comcare scheme relies on PCBUs having robust safety systems in place and being responsible for identifying their own risks and acting on them, Comcare inspections assess the systems which have been implemented and advise the entity about anything requiring rectification. The test used by Comcare is what is ‘reasonably practicable’, an important consideration when making assessments in the detention network and particularly at Nauru and Manus Island.

4.52 Since the commencement of the WHS legislation (January 2012), Comcare has undertaken five site inspections of Manus Island and Nauru OPCs. The most recent report on Manus Island concluded:

I am satisfied that DIBP are ensuring as far as reasonably practicable the health and safety of workers at MRPC.⁸² There is no evidence of any non-compliance with section 19 of the *Work Health and Safety Act 2011* (the Act). There are, however, some areas of potential improvement.

4.53 The areas of potential improvement included road maintenance and a modified cleaning regime to rectify a problem with mould in the kitchen.

4.54 DIBP Comcare premiums have doubled since 2011–12, increasing from \$7.78 million to \$17.0 million in 2014–15. However, DIBP’s premium rates have only increased at around the same rate as that for all agencies taken as a whole. While the department expected its Comcare premium to rise by 2.04 per cent for 2013–14, ‘the rate increase was reduced to 1.92 per cent as a result of improved performance by the department in work health and safety outcomes’.⁸³

82 Manus Regional Processing Centre.

83 Department of Immigration and Border Protection, 2013–14 Annual Report, p. 278.

Mitigation strategies

4.55 DIBP has put in place a number of mitigation strategies to support the health and safety of DIBP workers, including interpreters. Mitigation strategies include:

- pre-deployment medical assessments and vaccinations;
- WHS inductions at each IDF site by DIBP staff and the service provider;
- pre-deployment guides for each of the facilities;
- the provision of the employee assistance program on-site and counselling service for interpreters to receive counselling, participate in workshops, conflict resolution and to address personal matters; and
- for DIBP employees, pre-deployment resilience assessments and post deployment debriefs.

4.56 DIBP has developed a Professional Support Framework (PSF), aimed at providing 'enhanced support to all staff deploying to immigration detention facilities (IDFs) and offshore processing centres (OPCs)' through targeted programs.⁸⁴ DIBP advises that implementation of the PSF in early 2014 has resulted in:

- the EAP provider having a physical presence on Manus Island and Nauru;
- the resilience and support programme being expanded to include staff whose deployment is less than three months;
- a programme of mandatory post deployment debriefs being introduced; and
- all staff deployed to Christmas Island, Nauru or Manus Island since March 2014 undergoing these programmes.

84 These programs include: national delivery of change management workshops with a separate focus on managers and staff; enhanced support mechanisms for staff, including comprehensive pre-deployment health clearances; pre-deployment resilience assessments and the opportunity to undertake the 'Resilience and Self Care Support Program' run by the department's EAP provider; mandatory post deployment debriefs with the EAP and home managers; a professional support training programme for staff going on deployment; the extension of on-site counselling support for Manus Island and Nauru; and a more robust performance management process for staff on deployment.

Pre-deployment strategies for interpreters

4.57 DIBP recognises that there is a heightened risk of exposure to infectious and tropical diseases for workers in the detention environment. Interpreters, therefore, receive health checks and vaccinations as part of the pre-deployment program for deployees to the detention network.

4.58 As mentioned above, DIBP staff also have access to a resilience assessment and self care support program, and post deployment WHS debriefs with an appropriate person. To date, the department has not extended resilience assessment and training (in the form of a self care support program) or the post deployment debrief to interpreters. The ANAO notes that there has been at least one case of severe mental breakdown of an interpreter in an offshore processing facility and instances where interpreters are reporting fatigue at the six week mark.

4.59 The most recent TBSSC meeting in November 2014 agreed that resilience assessments should be extended to an initial group of 250 interpreters and that, pending agreement on an appropriate funding model for the program, it would be extended beyond the initial cohort.

4.60 The ANAO considers that there would be value in extending the resilience program to interpreters and providing them with an opportunity for a post deployment debrief through the EAP.

Conclusion

4.61 Deployment of interpreters to the complex immigration detention environment is a major undertaking. Pre-deployment processes, management of interpreters on deployment and post deployment follow up are all essential elements of an effective deployment operation. While DIBP has well-developed arrangements for deploying interpreters, oversight arrangements for interpreters have been less than adequate. DIBP would benefit from a more proactive approach to managing interpreter meetings to track the issues raised by interpreters. By not monitoring the meetings, the department is missing an opportunity to identify potential work health and safety (WHS) issues, which are often raised by interpreters in the formal meetings. The department may also wish to consider implementing a confidential feedback process, separate from the interpreter coordinator managed feedback process to enable interpreters to provide feedback where the interpreter coordinator is the subject of concern.

4.62 DIBP has established procedures for dealing with interpreter performance issues while on deployment but the respective roles of the interpreter coordinator and TIS National are not clearly defined. It would be helpful to the department, to TIS National and to the interpreters if the roles and responsibilities of DIBP, TIS National and the interpreter coordinator were more clearly defined and set out in the pre-deployment documentation provided to interpreters. Further, DIBP is aware that some interpreter coordinators are not well prepared for their role and has advised that it is considering arrangements to better prepare them prior to deployment. Continuation of regular teleconferences with interpreter coordinators and IMA interpreters, especially where new interpreter coordinators have been deployed to a detention facility, should be a priority for the department.

4.63 The department has in place a sound framework to manage WHS risks in the heightened risk environment of IDFs and OPCs. It takes care to identify and manage risks throughout the network and that its own employees are well prepared for deployment and have available to them services on return from a deployment. To better support interpreters, the ANAO notes the department's recent decision to provide resilience assessments to interpreters. There would also be benefit in interpreters participating in resilience training and mandatory post deployment debriefs.

Recommendation No.2

4.64 To improve the support arrangements provided to interpreters before, during and after deployment to facilities in the detention network, the ANAO recommends that the Department of Immigration and Border Protection provides contracted interpreters with appropriate resilience preparation and debriefing services.

DIBP response:

4.65 *Agreed. The Department agrees with the ANAO's recommendation and will implement improved support arrangements for interpreters before, during and after deployment to facilities in the detention network.*

4.66 *Progress has already been made with the planned implementation of appropriate resilience testing and preparation for interpreters, along with existing health screening checks already in place, prior to deployments.*

4.67 *The department will also review the post deployment support arrangements and will include debriefing services to complement its suite of Employee Assistance Program (EAP) services already available to interpreters.*



Ian McPhee

Canberra ACT

15 April 2015

Appendices

Appendix 1: Response from the Department of Immigration and Border Protection



Australian Government
Immigration and
Border Protection Portfolio

DEPUTY SECRETARY

Dr Tom Clarke
Executive Director
Performance and Audit Services Group
Australian National Audit Office
GPO Box 707
Canberra ACT 2601

Response to the proposed audit report on the Management of interpreting services

Dear Dr Clarke

Thank you for your letter dated 27 February 2015 and the opportunity to provide comments on the proposed audit report on the Management of Interpreting Services by the department's language service provider TIS National.

The Department of Immigration and Border Protection (DIBP) agrees with the two recommendations as presented in the Section 19 report.

Attached is the DIBP response to Recommendation no.1 Paragraph 2.49 and Recommendation no. 2 Paragraph 4.64 and summary of our comments to be included in the report under Appendix 1.

I would like to thank the Australian National Audit Office team for the co-operative and professional manner they have adopted in working with us on this matter. I look forward to continuing the good working relationship developed during this performance audit.

If you would like further information on this matter, please contact Trevor Neroy, Director, TIS National on (03) 9235 3651.

Yours sincerely

Michael Manthorpe PSM
Deputy Secretary
Visa and Citizenship Services Group

27 March 2015

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Attachment A

Recommendation No.1

2.49 To provide a sound basis for TIS National's charging of fees for interpreting services, the ANAO recommends that the Department of Immigration and Border Protection:

- *Reviews the policy basis for setting the fees to internal and external clients; and*
- *Takes steps to comply with the applicable requirements and government guidelines.*

Department's response:

The Department will progress on this recommendation by:

1. The first element of the recommendation being addressed as part of the DIBP/DSS review of TIS National which is currently underway; the policy basis on which charges and fee structures are applied will be clarified, agreed and formally documented, consistent with government policy.
2. The second element of the recommendation will be addressed through two tactical activities:
 - a. TIS national will invest in engaging an independent supplier to undertake a detailed cost/service analysis providing a current cost base on which the elements under the Cost Recovery Guidelines can be applied, following this;
 - b. TIS National will participate in the voluntary tender submission process available as part of a Competitive Neutrality Review this financial year, noting possible MOG timeframes.

Recommendation No. 2

4.64 To improve the support arrangements provided to interpreters before, during and after deployment to facilities in the detention network, the ANAO recommends that the Department of Immigration and Border Protection provides interpreters with appropriate resilience preparation and debriefing services.

Department's response:

The Department agrees with the ANAO's recommendation and will implement improved support arrangements for interpreters before, during and after deployment to facilities in the detention network.

Progress has already been made with the planned implementation of appropriate resilience testing and preparation for interpreters, along with existing health screening checks already in place, prior to deployments.

The department will also review the post deployment support arrangements and will include debriefing services to complement its suite of Employee Assistance Program (EAP) services already available to interpreters.

Appendix 2: Response from the Department of Social Services



Australian Government
Department of Social Services

Finn Pratt PSM
Secretary

Dr Tom Clarke
Executive Director
Performance Audit Services Group
Australian National Audit Office
GPO Box 707
Canberra ACT 2601

Dear Dr Clarke

Thank you for your letter of 27 February 2015 regarding the Australian National Audit Office's (ANAO) proposed audit report on *Management of Interpreting Services* by the Department of Immigration and Border Protection (DIBP).

The Department of Social Services (DSS) welcomes the findings outlined in the audit report and appreciates the opportunity to respond.

I note that while there are no recommendations for DSS, the ANAO report provides a constructive range of findings which will usefully inform the joint DSS/DIBP review of Translating and Interpreting Services (TIS National) currently underway.

DSS agrees that a clarification of the strategic objectives of TIS National will inform future improvements to effective service delivery and that this will be considered as part of the TIS National review.

DSS also notes the report's acknowledgement of the role that TIS National plays in relation to the Government's Multicultural Access and Equity Policy, an area for which DSS is responsible.

Provision of high-quality interpreting and translating services is essential, both for non-English speakers accessing key services and for government agencies in meeting multicultural access and equity objectives. Language services also contribute to efficient and effective service delivery and help government agencies mitigate risk in their dealings with the public.

DSS agrees that the extent to which TIS National monitors its contribution to the achievement of access and equity objectives may also usefully be considered as part of the review process, taking into account a clarified strategic rationale for TIS National.

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www.dss.gov.au

25 MAR 2015

DSS will continue to work with DIBP to support the review work.

A short response to the proposed report is at **Attachment A** as requested.

Should you wish to discuss this matter further, please contact Ms Kris Cala, Branch Manager, Settlement Branch on 02 6146 6554.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Finn Pratt'.

Finn Pratt

20 March 2015

Attachment A

DSS response to the Section 19 report on the *Management of Interpreting Services*

DSS welcomes the ANAO report, which provides a constructive range of findings that will usefully inform the joint DSS and DIBP review of TIS National currently underway.

DSS agrees that a clarification of the strategic objectives of TIS National will inform future improvements to effective service delivery and that this will be considered as part of the TIS National review.

DSS also notes the report's acknowledgement of the role that TIS National plays in relation to the Government's Multicultural Access and Equity Policy, an area for which DSS is responsible.

DSS agrees that the extent to which TIS National monitors its contribution to the achievement of access and equity objectives may also usefully be considered as part of the review process.

DSS will continue to work with DIBP to support the review work.

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Australian Trade Commission

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Across Entities

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The Ethanol Production Grants Program

Department of Industry and Science

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Management of the Disposal of Specialist Military Equipment

Department of Defence

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Administration of the Tariff Concession System

Australian Customs and Border Protection Service

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Delivery of Australia's Consular Services

Department of Foreign Affairs and Trade

ANAO Report No.22 2014–15

Administration of the Indigenous Legal Assistance Programme

Attorney-General's Department

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Administration of the Early Years Quality Fund

Department of Education and Training

Department of Finance

Department of the Prime Minister and Cabinet

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Managing Assets and Contracts at Parliament House

Department of Parliamentary Services

ANAO Report No.25 2014–15

Administration of the Fifth Community Pharmacy Agreement

Department of Health

Department of Human Services

Department of Veterans' Affairs

ANAO Report No.26 2014–15

Administration of the Medical Specialist Training Program

Department of Health

ANAO Report No.28 2014–15

Management of Interpreting Services

ANAO Report No.27 2014–15

Electronic Health Records for Defence Personnel

Department of Defence

ANAO Report No.28 2014–15

Management of Interpreting Services

Department of Immigration and Border Protection

Department of Social Services

Better Practice Guides

The following Better Practice Guides are available on the ANAO website:

Public Sector Financial Statements: High-quality reporting through good governance and processes	Mar. 2015
Public Sector Audit Committees: Independent assurance and advice for Accountable Authorities	Mar. 2015
Successful Implementation of Policy Initiatives	Oct. 2014
Public Sector Governance: Strengthening performance through good governance	June 2014
Administering Regulation: Achieving the right balance	June 2014
Implementing Better Practice Grants Administration	Dec. 2013
Human Resource Management Information Systems: Risks and Controls	June 2013
Public Sector Internal Audit: An Investment in Assurance and Business Improvement	Sept. 2012
Public Sector Environmental Management: Reducing the Environmental Impacts of Public Sector Operations	Apr. 2012
Developing and Managing Contracts: Getting the Right Outcome, Achieving Value for Money	Feb. 2012
Fraud Control in Australian Government Entities	Mar. 2011
Strategic and Operational Management of Assets by Public Sector Entities: Delivering Agreed Outcomes through an Efficient and Optimal Asset Base	Sept. 2010
Planning and Approving Projects – an Executive Perspective: Setting the Foundation for Results	June 2010
Innovation in the Public Sector: Enabling Better Performance, Driving New Directions	Dec. 2009
SAP ECC 6.0: Security and Control	June 2009
Business Continuity Management: Building Resilience in Public Sector Entities	June 2009
Developing and Managing Internal Budgets	June 2008