



IRISH TRANSLATORS' and INTERPRETERS' ASSOCIATION CUMANN
AISTRITHEOIRÍ agus ATEANGAIRÍ na hÉIREANN

**Submission to the Office of Government Procurement in
response to their Request for Information on the provision
of interpretation and translation services**

August 2019

The Irish Translators' and Interpreters' Association

The Irish Translators' and Interpreters' Association (ITIA) was founded in 1986 as a not-for-profit organisation. It is the only professional association in Ireland representing the interests of practising translators and interpreters. The ITIA aims to promote the highest standards within the profession and to foster an understanding among translator and interpreter clients of the highly-skilled and exacting nature of the profession. To this end we have introduced translation tests for our top category of membership, professional membership. We also have a separate test for professional members who wish to specialise in the translation of legal documents and become ITIA certified legal translators. The ITIA is not a translation company and does not provide translation or interpreting services. We have no corporate members. We represent some 300 translators and interpreters who are bound by our codes of ethics.

Below we respond to the issues raised in the OGP request for information, dealing first with translation and then with interpreting.

Range of languages

A complicating factor in the provision of interpreting and translation services in Ireland is the large number of languages involved. However, it is more of an issue for interpreting than for translation because while translators can be recruited outside Ireland, interpreters are needed on-site for face to face interpreting.

Translation

Access to high quality translators

Translation courses are available at a number of universities across Ireland. For example, there are undergraduate courses at University of Limerick and Dublin City University and postgraduate courses at NUI Galway, University College Cork and Dublin City University. However, the range of languages is quite limited – typically, French, Spanish, German, Italian, Irish, Chinese and Japanese – and does not meet all the needs of the public sector in Ireland. It is worth noting that there are translation courses in other European countries in particular – see for example, the European Masters in Translation¹ (EMT) network set up by the European Commission. Most EU countries have appropriate training for translators. Another option is the Diploma in Translation from the Chartered Institute of Linguists in London. Experienced, professional freelance translators, based in Ireland and abroad, are available in many language combinations, and indeed many are members of the ITIA. We acknowledge that it may be difficult to locate professional translators for some languages for which no accreditation is available.

Accuracy/ Monitoring of translation

Contracts typically stipulate that a percentage of translations have to be checked by an independent third party. It is important that the third party should include professional translators who are qualified in the relevant language combination who can carry out

¹ https://ec.europa.eu/info/resources-partners/european-masters-translation-emt_en

informed translation quality assessment. International standards are an important way to ensure that translators are qualified and that their work is reviewed by another person to ensure that translations are fit for purpose.

Standards for Translation Services

Please note that the European Committee for Standardization standard EN 15038 (2006) was replaced by ISO 17100 in November 2015.

ISO 17110: 2015 Requirements for translation services. This standard focuses solely on translation and is very useful. We believe that all contracted translation companies should use this standard which details translator qualifications and professional competences and includes the professional competences of revisers and reviewers. It also pins down the process in translation service project management in detail. Most importantly, it provides that translations are revised by comparing the source text with the target text.

ISO 9001: 2015 relates to quality management systems and is widely used by organisations and companies including some in the translation industry.

The ITIA recommends that all translation companies hold up to date accreditation for ISO 17100 and ISO 9001.

This National Standards Authority of Ireland search facility is useful for checking that companies are currently certified for ISO standards:

<https://www.nsai.ie/certification/search-for-a-certified-company/>

New Technologies for Translation Services

Nowadays, most translators use computer-assisted technology (CAT) tools. For example, translation memory (e.g. Trados, MemoQ) is particularly useful for translators who are working on documents where the same terminology is being used repeatedly. The translation memory retains the translations chosen and suggests them when the term comes up again. This saves time, ensures consistency and reduces costs.

Another development is machine translation, which is advancing but still far from perfect. To ensure confidentiality and best possible results, a specific machine translation (e.g. Kantan) would need to be developed for a particular field and languages. Machine translated texts generally need to be post-edited by a human translator. Indeed, post editing by a human is a requirement for compliance with GDPR where personal data are involved. Machine translation plus post editing can work well for some language combinations and again can reduce the cost of translation.

Obstacles to the delivery of translation services

The rates paid by some translation companies are an obstacle to the provision of a quality service. The ITIA has heard of rates as low as 3c a word. This is unsustainable and is an indicator that the translators concerned are unqualified or perhaps starting out and anxious to build up experience. Qualified professional full time translators will not accept these rates because they cannot make a living on them. The ITIA appreciates that cost is an important criterion but if the Office of Government Procurement is concerned about quality, it is

essential that translators are qualified (for language combinations where courses are available) and that they are appropriately remunerated.

Interpreting

Access to high quality interpreters

In 2008 the then Office of the Minister for Integration Policy commissioned a report² on interpreting and translation but its recommendations were not implemented. Article 5.1 of EU directive 2010/64/EU on the right to interpretation and translation in criminal proceedings provides that:

Member States shall take concrete measures to ensure that the interpretation and translation provided meets the quality required under Article 2(8) and Article 3(9).

The ITIA is not aware of any relevant initiatives being taken by the Irish state to tackle the issue of quality. Interpreter provision in Ireland is very problematic. From 2004 to 2009 there was a Graduate Certificate in Community Interpreting course at Dublin City University. This course was run by Mary Phelan and interpreters were trained for Polish, Russian, Romanian, French and Spanish. This training was language specific, which meant that students received feedback on the accuracy of their interpreting and how to improve. However, these qualified interpreters were not prioritised for work and few are currently working as interpreters. Ten years later, there is no training course in Ireland for community interpreters. Nor is there any test to establish if interpreters meet required standards. Experience is no guarantee of quality.

Interpreters working on the Irish market can be divided into a number of groups, from largest to smallest:

- Interpreters who have a qualification in another area but have no qualification in interpreting, translation or even languages
- Interpreters who have no qualification at all
- Interpreters who have a qualification in translation. This is a useful background but will require a lot of self-directed learning to become proficient at interpreting
- Interpreters who hold a qualification in conference interpreting. The difficulty here is that the training is quite specific and may not prepare them for typical community interpreting settings
- A very small number of interpreters hold the Diploma in Public Service Interpreting from the Chartered Institute of Linguists in the UK or the Graduate Certificate in Community Interpreting from Dublin City University, which is no longer available.

² *Developing Quality Cost Effective Interpreting & Translating Services for Government Service Providers in Ireland* (2008)

Some translation companies provide half or full day training to interpreters but this is totally inadequate. Some companies have their own in-house test, but again we would question if such an approach is fit for purpose. It is a real problem that there is no properly accredited course for interpreters who work for the courts, Garda, in hospitals, international protection and for social welfare. The State spends quite a lot of money on interpreting but has no guarantees whatever as to the quality of the work.

This issue will not be solved until there is an incentive for interpreters to obtain qualifications and supports introduced for universities to provide training courses. In addition or alternatively, a State examining system could be introduced. From a given date, e.g. 2030, only qualified interpreters would be permitted to continue working in this area. However, current low rates of pay (see below) are a significant barrier to locating suitable personnel.

Accuracy/ Monitoring of Interpreting

Monitoring of interpreting is complex but it can be done. One approach would be for a qualified person who is fluent in the relevant languages and qualified to accompany an interpreter to an assignment and to take notes. Another approach would be for a qualified person to listen to recordings of an interpreted session, transcribe what was said in English and the other language, and translate what was said in the other language into English and then write a report. These solutions are not cheap but, given the absence of training courses in Ireland, it is essential to monitor a percentage of interpreted events to establish if interpreters are competent. In addition, ethical issues can be very problematic in interpreting. For example, the interpreter may take sides with one party against the other. Or the interpreter may provide advice or interject their own opinions. Or the interpreter may not interpret all that is said. Untrained interpreters may not appreciate the importance of confidentiality.

Standards for Interpreting Services

There are three ISO standards for interpreting services but as far as we are aware, none of the translation companies based in Ireland are currently accredited. We wonder why this is the case. The standards are:

ISO 13611 2014 Interpreting – guidelines for community interpreting. This standard details competences related to interpreting and goes on to detail required qualifications and experience of interpreters.

ISO 18841 2018 Interpreting services – general requirements and recommendations. This standard is quite general and applies to all types of interpreting, including conference interpreting.

ISO 20228 legal interpreting. This standard details the competences and qualifications of legal interpreters. Very few interpreters based in Ireland meet these standards.

Again, the National Standards Authority of Ireland search facility is useful for checking if companies are currently certified for ISO standards:

<https://www.nsai.ie/certification/search-for-a-certified-company/>

New technologies for Interpreting Services

This is a non-runner for the foreseeable future. There has been some discussion about using voice recognition plus machine translation plus a digitised voice for interpreting but this may never become reality.

However, telephone and video interpreting have been used successfully in other countries. Telephone interpreting, provided by a company in the UK, is used by the ambulance service in Ireland. Telephone interpreting should be provided by professionals, preferably on a dedicated landline.

Obstacles to the delivery of interpreting services

The fact that there is no training course in Ireland for interpreters who work with public sector bodies is a huge problem.

Rates of pay for interpreters are also extremely problematic and are certainly not an inducement for those with relevant qualifications. The current hourly rate before deductions varies between €12 and €18 per hour. Most translation companies do not pay for transport unless the interpreter has to travel to another county. Interpreters are not reimbursed for time spent travelling to and from assignments. Basically, interpreters are on zero hour contracts with no guarantee of work. In such circumstances, they are unlikely to continue in this line of work long term. As a result, companies are constantly recruiting new freelance interpreters.

Recommendations

- We strongly recommend that requests for tender insist on ISO standards for translation and interpreting, that certification be verified by the contracting body, and that ongoing certification be a condition for all contracts. 'Compliance with' standards is insufficient.
- The situation regarding lack of training and testing for interpreters is not going to change in any way unless steps are taken at government level to ensure that all interpreters working in Ireland are trained and tested.
- There is a need to rethink the qualifications required of interpreters in requests for tender.

We are happy to share our expertise with representatives of the OGP to discuss the matters raised here in more detail. We can also direct you to Irish-based experts in translation technology if needed.

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