

## Guide for Trainee/Freelance Interpreters

### Foreword

### What is NUBSLI?

The National Union of British Sign Language Interpreters (NUBSLI) was established in May 2014 in response to the government's changes to Access to Work. The campaign group, Stop Changes To Access to Work, had previously been established to challenge the divisive tactics being used by government against the deaf community and interpreters. However it soon became apparent that alongside the deaf community, the interpreting profession would also be targeted under the banner of the government's 2012 welfare reforms.



NUBSLI was set up to ensure BSL/English interpreters/translators have a strong political voice, and so that the interpreters/translators could be protected from imposed detrimental changes to terms and conditions, and fees. In protecting the BSL/English interpreting profession, the Union also serves to protect and uphold the British Deaf community's access to services.

### "Standing up for interpreters, Standing with the Deaf community"

To find out more about NUBSLI please see our website:

<http://nubsl.com/about-us>

## Guide for Trainee/Freelance Interpreters

### Who is this guide for?

The aim of this guide is to provide some basic information to trainee and newly qualified interpreters, about working freelance and the support available to you. The guide may be useful to other interpreters at any stage of their career who are about to start freelance work.

Advice and guidance is always available for members of NUBSLI, whose aim is to ensure interpreters feel protected, safe and supported. Members also benefit from Unite's legal services and a range of other membership benefits.

<http://www.unitetheunion.org/how-we-help/>

## Guide for Trainee/Freelance Interpreters

### SECTIONS:

#### **SECTION 1: SETTING UP**

- a) Registration
- b) Professional Membership
- c) NUBSLI – The National Union of BSL Interpreters
- d) HMRC - Unique Tax Reference/Sole Trader/Ltd Company
- e) Professional Indemnity Insurance (PII) and DBS
- f) Registering with agencies

#### **SECTION 2: FEES/T&Cs/FINANCE**

- a) NUBSLI Fee Guidance
- b) Terms & Conditions
- c) Record keeping
- d) Invoicing
- e) Chasing payment/late payment charges
- f) Pension/Critical Illness cover

#### **SECTION 3: WORKING PRACTICES**

- a) Professional competence
- b) Co-working/Co-interpreting
- c) Preparation
- d) Unethical practice/complaints

#### **Section 4: CPD**

- a) What is required?
- b) How to log and record
- c) Structured/Unstructured CPD

#### **SECTION 5: MISCELLANEOUS**

- a) Where can I get further info/help?
  - b) Joining NUBSLI
- Joining NUBSLI is as easy as 1, 2, 3...

## Guide for Trainee/Freelance Interpreters

### SECTION 1: SETTING UP

#### a) Registration

Registration is important as it shows that you have achieved the relevant qualifications needed to work as a BSL/English interpreter as per the National Occupational Standards in Interpreting. It also sets interpreters apart as “professionals” and gives those who you work with an understanding of what to expect.

There are currently three avenues of registration: NRCPD, RBSLI and SASLI. A number of agencies and contracts only engage NRCPD registered interpreters at present.

##### NRCPD

NRCPD registration currently costs £205 per annum for RSLI status, and £125 for TSLI status. Registered Sign Language Interpreters (RSLIs) must evidence 24 hours of Continuous Professional Development (CPD) per year to maintain their registration status with NRCPD. (For more information about CPD, see Section 4). Further details can be found at <http://www.nrcpd.org.uk/joining-a-register>

##### RBSLI

RBSLI registration currently costs £450 for three years of registration (with a £50 admin charge waived). You can pay annually with the first year costing £200 and £150 thereafter. CPD is strongly encouraged but evidence is not a requirement. Further information on RBSLI can be found at <http://www.rbsli.org/joinRBSLI>

SASLI maintains a register of Sign Language Interpreters and Communication Professionals in Scotland. Registration is available in various categories and levels depending on a number of factors, [available on their website](#) and is for trainee and full members. SASLI members are expected to accrue a set number of CPD points per membership year and be registered with the Protecting

## Guide for Trainee/Freelance Interpreters

Vulnerable Groups Scheme (PVG Scheme), which is managed and delivered by Disclosure Scotland.

Both regulatory bodies require evidence of your BSL/English Interpreting qualifications as well as DBS Checks (*see point e*).

## Guide for Trainee/Freelance Interpreters

### **b) Professional Membership**

Becoming a member of a professional membership organisation holds many benefits. If you decide to become a member there are two professional membership organisations; the Association of Sign Language Interpreters (ASLI) and Visual Language Professionals (VLP).

#### ASLI

ASLI aims “to encourage good practice in sign language interpreting and to support our fellow professionals”. ASLI provides various training opportunities nationally at reduced rates for members, holds regional and national meetings, and has links to various resources including best practice recommendations. Current membership fees per annum are, £180 as an Associate member, and £204 as a Full member, both include annual PII cover. It is also possible to join as a Student member for £48 a year. To find out more:

[https://www.asli.org.uk/cpd/why\\_join\\_asli](https://www.asli.org.uk/cpd/why_join_asli)

#### VLP

VLP’s aim is “to support each other on a local and national basis, to promote and maintain high standards of sign language interpreting and encourage good practice throughout the profession”. Membership with VLP is only open to RSLIs and the annual cost is £50 which includes PII cover. To find out more:

<http://www.vlp.org.uk/membership/>

Both membership organisations hold conferences which interpreters can attend at a cost (discounts for members). Attendance at two days if a conference will usually provide you with around 12 hours of structured CPD – *see section 4*.

Both have email forums that can be accessed for information and support.

## Guide for Trainee/Freelance Interpreters

### c) NUBSLI – The National Union of BSL Interpreters

The National Union of British Sign Language Interpreters (NUBSLI) is part of Unite the Union. It is the fastest growing union of a single profession and the first national union of sign language interpreters in the world.

NUBSLI's aim is to protect the rights of BSL/English interpreters/translators working in the UK.

There are many benefits to joining NUBSLI and you will be a part of Unite the Union with further additional benefits:

Access to NUBSLI benefits:

- Being part of a democratic collective voice and having your say on issues that affect you
- Representation at the highest levels of government giving interpreters a political voice
- Representation to relevant groups (UKCoD, NRCPD, RBSLI, BDA, NRPSI/NUPIT/PI4J)
- Support with late payment issues
- Support with other legal and business issues
- Experienced union reps to support you and provide guidance
- Emergency support offered outside usual working hours
- Support offered for employed or freelance interpreters
- Freelance fee guidance which is updated annually by members
- Access to the monthly meeting via webinar
- Discussion on the issues affecting us now

## Guide for Trainee/Freelance Interpreters

- Regular communications keeping you up to date
- Making the profession more united and robust
- Free booking of rooms for CPD at Unite regional office for NUBSLI members
- Buddy system for Trainee interpreters
- Access to CPD via attendance at monthly or annual meetings or via webinar training
- Being part of a campaigning organisation working towards making our work/Access for Deaf people better
- Access to local members via Regional Organisers
- Be part of the 30% of interpreters who are already members and working together to make our work sustainable and to continue quality of access to the Deaf community

### Access to Unite member benefits:

- Access to a 24 hour free legal helpline
- Free will service
- Access to affiliated services' discounts e.g. foreign currency, insurances
- Discount rates for the Unite hotel in Eastbourne
- Discounted rates for financial advice in your own home
- Access to member breaks at Esher Place, Surrey
- Access to a credit union
- Access to the People's Operator for great mobile phone deals
- Discounts for other services – e.g. tax return service
- Vouchers for referring new members to Unite
- Being part of the largest Union in the UK and campaigning with other Unions on similar issues
- Critical illness insurance advice
- Pension advice
- Free eye test



## Guide for Trainee/Freelance Interpreters

Membership cost is dependent on the number of hours you work (part time, full time or on leave), for further information see:

<http://www.unitetheunion.org/growing-our-union/joinunite/contributonrates/>

Find out more on page 22. There is more information online:

<http://www.nubsli.com/join-us>

### **d) HMRC - Unique Tax Reference/Sole Trader/Ltd Company**

As a freelance interpreter you must register with HMRC as self-employed. You need to decide on the structure of your business. This is usually either a sole trader or a limited company.

HMRC will register you for self-assessment and provide you with a Unique Tax Reference (UTR) number. This number identifies you with the Tax Office as self-employed and you will be required to submit a self-assessment tax return every financial year. The paperwork differs depending on whether you are a sole trader or a limited company.

Being a limited company (usually 'limited by shares') is a slightly more complex process in that you need a company name, to be registered with companies house and additional documents such as a Memorandum of Association. However, the setting up process is quite straightforward, it takes 24 hours and costs as little as £15. If you register via the online system, you can also use standard articles of association. Find out more here:

<https://www.gov.uk/register-a-company-online>

Whilst the paperwork is more complex, it has the benefit of keeping your business finances separate from your personal finances, and as

## Guide for Trainee/Freelance Interpreters

a Director of the company you are not liable for any of the company's debts. Also, limited companies pay Corporation Tax which can be less than the tax paid as a sole trader.

Some self employed people complete their own tax return and some use an accountant. Whichever you choose you will need to keep

### MEMBERSHIP BENEFIT:

Unite provide a discount to members for  
their Tax Return service.

<http://yourtaxrefund.co.uk/index.php?page=unite>

records of your income and expenditure and receipts. Information about allowable business expenditure can be sought from HMRC or an accountant.

### **e) Professional Indemnity Insurance (PII) and DBS**

Professional Indemnity Insurance (PII) is a registration requirement for all interpreters. This insurance covers any fees/compensation costs should someone make a complaint against you or engage in a legal dispute over the services you have provided. You can obtain your own PII via insurance companies such as MHA or Hiscox. Cost will depend on level of cover but can be as cheap as £35. If you are a member of VLP or ASLI you will have PII provided as part of your membership.

An enhanced Disclosure Barring Service (DBS) check is also a requirement for registration. Anyone who works with children or vulnerable adults is required to hold this check.

There are lots of agencies that will be able to process a DBS check on your behalf for a charge. Please contact us for recommendations at: [communications@nubsli.com](mailto:communications@nubsli.com).

## Guide for Trainee/Freelance Interpreters

Once you have a DBS certificate in place, you can set up an automatic annual renewal for £13. Go to the gov.uk renewal website to find out more:

<https://www.gov.uk/government/news/renew-your-dbs-update-service-subscription-dont-miss-out>

### f) Registering with agencies

There are many agencies that you can register with to obtain work. Some are more reputable than others. There is no charter or quality mark for agencies. It is useful to ask local interpreters about the best agencies to work with in your area.

## SECTION 2: FEES/T&Cs/FINANCE

### a) NUBSLI Fee Guidance

NUBSLI carried out a membership survey across the country to establish a guide on fees to assist freelance interpreters. This can be seen here: <http://nubsli.com/guidance/interpreter-fees/>

The aim of this work was to establish a benchmark of fair, appropriate and sustainable fees for interpreters. The need for this guidance was heightened by government and some agencies attempting to drive down the profession's fees and terms and conditions. In establishing fee guidance NUBSLI has made it possible for interpreters to be

## Guide for Trainee/Freelance Interpreters

working in solidarity with one another to ensure we are all paid a fair wage and remunerated appropriately.

The fees for interpreters can vary slightly region to region. Nevertheless, a 'call-out' fee of 3 hours, along with working to full/half day charged sessions developed as industry standard to ensure that the profession can be maintained. It is becoming more commonplace for agencies to offer rates of pay on 2 hour minimums, and hourly thereafter. This practice is threatening the sustainability of the profession. All interpreters should be paid a minimum of 3 hours per booking, whether TSLI or RSLI.

Following the survey results, a call out fee has been included in the guidance. The fee reflects that some interpreters are able to do more assignments per day and therefore charge less to accommodate this.

We would recommend that interpreters think about local market forces when quoting for bookings, so as not to have a detrimental impact on other interpreters in the area. The work of NUBSLI on fees guidance requires the collective support of freelance interpreters sticking to their terms and conditions and fighting for fair and appropriate pay.

*Please note: NUBSLI have taken advice from Unite the Union's legal department about this piece of work and can confirm that this does not breach any competition laws.*

For more information on NUBSLI Freelance Fee Guidance please see the FAQs on our website:

<http://nubsli.com/guidance/interpreter-fees-faqs>

### **b) Terms & Conditions**

Your terms and conditions (T&Cs) are the guidelines and stipulations you set out regarding your working practices. Most interpreters will

## Guide for Trainee/Freelance Interpreters

have a set of terms and conditions which detail cancellation terms, and specific conditions under which they are prepared to work. For example they may stipulate the following type of information: when a co-worker is needed, any required preparation materials and the need to be notified in advance if an assignment is to be streamed or recorded for public use. Some choose to include their fee rates as well. The industry standard cancellation terms are as follows:

- Over 14 days – no charge
- 14-8 days – 50% charge
- 7 – 0 days – 100% charge

*Please note: NUBSLI are in the process of producing template T&Cs, in collaboration with legal experts from Unite the Union, to assist members.*

### c) Record keeping

Accurate and timely record keeping are essential. It is recommended that you keep an up to date spreadsheet or log of all your bookings with the following information:

- Invoice number
- Date of booking
- Name of agency/ booker
- Booking reference number
- Agreed fee
- Agreed travel/expenses
- Date invoice was sent
- Date payment received

You may wish to log further details such as the name of any co-workers and preparation requested or received.

Also, keep notes on any incidents or issues, e.g. travel problems, if the client does not arrive (how long did you wait, who said you were able

## Guide for Trainee/Freelance Interpreters

to leave), any differences between the information provided about the job you accepted and the actual booking, and so on. These are essential in order to protect yourself in the case of any disputes.

Be aware of the need to protect any sensitive data appropriately so as to not be in breach of the Data Protection Act. Seek advice if you are not certain.

### d) Invoicing

Timely invoicing is important to ensure you are paid within a given period. It is important you keep a record of when you sent your invoice to the organisation so that you can chase late payment and keep evidence. Sending invoices electronically is useful in identifying when invoices were sent.

Some interpreters choose to use invoicing software which provides a secure way to create and access your invoices remotely. Whilst some of these incur a charge there are benefits to using this method, for example you are able to set up automatic late payment notifications to your clients, and can send invoices simply from a smart phone. Any cost of business software can be offset against tax liability.

Some examples of invoicing software are:

- Freshbooks <http://www.freshbooks.com/>,
- Clearbooks <https://www.clearbooks.co.uk/>
- Quickfile <http://www.quickfile.co.uk/>
- Invoice2go <https://invoice.2go.com/en-uk/>
- Free Agent <http://www.freeagent.com/>

## Guide for Trainee/Freelance Interpreters

### e) Chasing payment/late payment charges

Government Late Payment Legislation stipulates that invoices should be paid within 30 days. See the gov.uk website for more information: <https://www.gov.uk/late-commercial-payments-interest-debt-recovery/when-a-payment-becomes-late>

If you have agreed a longer payment period with a client (e.g. 40 days) then the late payment fee is applicable after the date you have agreed. An interest calculator showing what you are legally entitled to charge is also available via this website which is currently set at 8% plus the Bank of England base rate, plus a compensation charge. It is good practice for your invoices to include a statement about the fact that you will levy late payment charges in accordance with legislation if necessary.

It is advisable to send a reminder on, or soon after, the due date. The point at which the decision to reissue an invoice with late payment charges added is an individual one. This may depend on what, if any, interaction you have received following a reminder email.

NUBSLI are able to access legal advice and representation via Unite's legal department if members require support around late payments.

## Guide for Trainee/Freelance Interpreters

### f) Pension/Critical Illness cover

As a freelancer you will need to arrange your own pension, should you wish to have one. You can find out more about pensions here:  
<http://www.unitetheunion.org/unite-at-work/pensions/>

Not all interpreters pay for critical illness cover, although it is also recommended.

#### MEMBERSHIP BENEFIT:

Unite can help you find the type of cover you need including income protection in case you get sick or have an accident.

Find out more and get advice here:

<http://www.unitelife.org/index.php>



## Guide for Trainee/Freelance Interpreters

### SECTION 3: WORKING PRACTICES

#### a) Professional competence

NRCPD have a Code of Conduct to which regulated Trainee Interpreters and RSLIs must adhere. The Code states; "2.1. You should only undertake assignments for which you have the appropriate qualifications, competence and experience."

(You can see the full Code of Conduct here:

<http://www.nrcpd.org.uk/code-of-conduct>)

Trainee interpreters should not undertake assignments in the following domains:

- Legal – Police/Court/Solicitors
- Mental Health
- Child Protection
- Social Services
- Disciplinary meetings
- Any assignment which involves the signing of legally binding documentation

If you are asked to undertake this work by an agency, you should refer them to the NRCPD Code of Conduct and contact NUBSLI for support.

#### b) Co-working/Co-interpreting

Co-working (or team interpreting) occurs when the duration or complexity of the assignment requires two or more interpreters. This is usually for bookings over 2 hours, or on occasions it can be less than 2 hours when the demands of the assignment necessitate more than one interpreter.

## Guide for Trainee/Freelance Interpreters

You should request the name of your co-worker in advance from the person/agency who has booked you. This is important so that you can ensure they are suitably qualified and registered with NRCPD or RBSLI. It is also good practice to make contact with your co-worker prior to the booking to: share any relevant existing knowledge that either one of you may have, to talk over preferred ways of working together and to prepare for the assignment.

### c) Preparation

You are entitled to request preparation information and materials for assignments you are booked for and also to receive this with sufficient time to make use of the information.

If you have requested preparation and do not receive it you are entitled to withdraw from the booking under NRCPD's Code of Conduct, section 3.

In addition, it is good practice to use your initiative to prepare as fully as possible, e.g. using the internet to do research ahead of the assignment or speaking to colleagues.

### d) Unethical practice/complaints

If you are concerned about the behaviour or practice of another interpreter, agency or client you can contact NUBSLI, your registration body (NRCPD, RBSLI or SASLI) or the booking agent. NRCPD, RBSLI and SASLI have complaints procedures which can be accessed via their websites.

NUBSLI is interested in unethical practice by any agencies and welcomes case studies. If you have any information about agencies not adhering to industry standard fees or terms and conditions or practices such as charging interpreters fines please send to



## Guide for Trainee/Freelance Interpreters

[communications@nubsl.com](mailto:communications@nubsl.com). This information will be used to support the work of NUBSLI and in supporting our members.

## Guide for Trainee/Freelance Interpreters

### Section 4: CPD

#### a) What is required?

Continuous Professional Development (CPD) is the training, learning and development that is undertaken post qualification. As practice professionals, it is crucial for interpreters to maintain an up to date level of knowledge, to continue to develop our skills and challenge our thinking.

CPD can include conference events, training courses, webinars, further reading/research, mentoring or supervision and meetings with colleagues or mentors/supervisors

NRCPD currently require RSLI interpreters to log 24 hours worth of CPD per registration year. This means that you need to start collecting CPD hours from the day you upgrade your registration from TSLI to RSLI, ready to submit when you renew your registration the following year. You should decide on your own objectives for the year and record this as part of your evidence. The CPD you undertake during a year should link back to your personal set objectives.

The hours are split into 'Structured' and 'Unstructured' (*see point c*). Further information and details can be found in the NRCPD CPD handbook here:

<http://www.nrcpd.org.uk/continuous-professional-development>

RBSLI do not have CPD as a mandatory requirement for registration. However they do support the practice and have a system for their registrants to log their CPD. RBSLI recommend interpreters log 18 hours of CPD per registration year. Further information can be seen here: <http://www.rbsli.org/cpd>

Information on SASLI CPD requirements can be found on their website:



## Guide for Trainee/Freelance Interpreters

<http://www.sasli.co.uk/cpd/>

## Guide for Trainee/Freelance Interpreters

### b) How to log and record

You can log the hours achieved on the NRCPD, or RBSLI websites under your account profile.

In addition to the log of time, you must keep your own more detailed records and evidence, (such as emails, certificates of attendance, powerpoint slides) of your CPD. If you are selected for audit from the NRCPD you need to be ready to present this evidence. This needs to include your CPD aims and objectives for the year, a reflective log of the activity undertaken, including what you learnt and gained in relation to your yearly objectives and your practice as a whole.

Therefore it is advisable to keep this record up to date and in order throughout the year, as and when you do any CPD.

NUBSLI has created two additional documents available for download for you to use for recording your annual CPD plan and one for recording the activities you have undertaken to complete your plan. They can be downloaded from the NUBSLI website on the same page this guide is available on:

<http://nubsl.com/resources/cpd-template/>

#### CPD Apps

Some interpreters use smartphone apps to record their CPD points. There are several of these available. Examples of these are:

- CPDMe
- CPD Log

They can be found from the compatible app-stores for your device (Android/iTunes). Ask colleagues for recommendations.

## Guide for Trainee/Freelance Interpreters

### c) Structured/Unstructured CPD

NRCPD require you to undertake a mix of CPD and hence the hours are divided into structured and unstructured.

In basic terms 'structured' CPD is the more formal activities with set objectives laid out e.g. training, organised events, facilitated supervision, courses and conferences (including the conferences of the membership organisations).

#### MEMBERSHIP BENEFIT:

NUBSLI offers free room bookings for members undertaking CPD. Contact us for more information:  
[communications@nubsli.com](mailto:communications@nubsli.com).

Branch Meetings can be recorded as CPD if they meet your learning objectives.

CPD certificates of attendance are emailed to members who attend NUBSLI meetings, whether they attend in person or remotely.

'Unstructured' CPD is the training or further learning you undertake on your own, this could be further reading, peer supervision groups or meetings with colleague(s) such as NUBSLI meetings, or self-reflection of your practice. Recording yourself interpreting and carrying out a discourse analysis or writing up a self-reflection account is another example of unstructured CPD.

## Guide for Trainee/Freelance Interpreters

### d) Supervision/Mentoring

It is good practice and strongly recommended for all interpreters to make arrangements to engage their own supervisor or mentor.

Group supervision:

Many interpreters set up their own peer supervision groups which can take a structured format and be facilitated (either by a more experienced interpreter or another professional, such as a psychologist), or more informally as a forum for colleagues to discuss issues with each other.

Individual mentoring/supervision:

One to one supervision/mentoring is extremely beneficial in allowing a practitioner the space to take a more holistic perspective on their work, allowing for more informed thinking to develop enhanced self-reflection skills.

The benefits of these practices are widely recognised. During the early stages of your career either mentoring or supervision is highly recommended.

#### MEMBERSHIP BENEFIT:

NUBSLI offer trainee members a Buddy as a point of contact and support to reach out to with any further questions or to be signposted to the right source of information.

Please contact [communications@nubsli.com](mailto:communications@nubsli.com) to request this.



## Guide for Trainee/Freelance Interpreters

### SECTION 5: MISCELLANEOUS

#### a) Where can I get further info/help?

There is lots of help and support available to you from NUBSLI and Unite the Union, you can contact us here:  
[communications@nubsli.com](mailto:communications@nubsli.com)

#### b) Joining NUBSLI

**Joining NUBSLI is as easy as 1, 2, 3...**

1. Join using Unite's website (or join using the Unite the Union app).  
<http://www.unitetheunion.org/growing-our-union/joinunite/>
2. Wait for an email confirming your membership number.
3. Send your membership number to  
[communications@nubsli.com](mailto:communications@nubsli.com).

Important: Once you've joined Unite, you must tell us your membership number. This is to make sure that you are added to NUBSLI.