



Australian Sign Language Interpreters and Translators Association

NDIA Review Submission

The Australian Sign Language Interpreters and Translators Association (ASLITA) is a not-for-profit body and is the national peak organisation representing the interests of Auslan/English Interpreters, Deaf Interpreters and Translators in Australia.

ASLITA has a 30+-year history of advocating for the Auslan/English Interpreter industry. Our unpaid, voluntary board works to address industry needs, uphold best practice protocols, and advocate for the working conditions of practitioners. We adopt a proactive and collaborative approach to resolving industry-wide challenges, partnering with employers, practitioners and clients (both Deaf and non-deaf people) to support a sustainable and robust interpreting sector.

For further information on this submission please contact:

National President

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ASLITA acknowledges Aboriginal and Torres Strait Islander peoples. We acknowledge the Traditional Owners of the lands on which we live, learn and work. We pay our respects to ancestors and Elders past, present and future. We honour Aboriginal and Torres Strait Islander peoples' unique culture and spiritual connection to the land, waters and seas and their contribution to enriching Queensland and Australia's communities. We also acknowledge the past leaders of Deaf community, who, through adversity and discrimination, have preserved the rich culture and language of the Australian Deaf community, Auslan.



Overview

The interpreting and translating industry has a symbiotic relationship with the Deaf, hard of hearing and Deafblind community, providing essential access to community life. The NDIS has significantly impacted our sector, yet the NDIA has not consulted ASLITA regarding these changes. The industry is a delicate ecosystem; even minor adjustments, such as the removal of cancellation fees and travel payments, can have far-reaching negative effects on interpreters, translators, providers and participants.

We wish to highlight several factors that are currently affecting the viability and sustainability of this already over-burdened field. These issues directly relate to the NDIS Pricing Guide, particularly:

1. Classification as 'consumables'
2. Removal of cancellation fees
3. Removal of minimum booking times
4. Removal of paid travel time
5. Lack of pricing structure
6. Differentiation of role of Communication Guides
7. Lack of training and resources

Industry Context

The interpreting and translating industry is highly casualised and almost entirely unregulated. Generally, interpreters and translators work on a casual basis for one or more language services providers and/or as sole traders. A minority are employed as staff interpreters with language services providers and for on-demand providers such as Convo Australia and the National Relay Service. As a result, this largely



female workforce experiences little financial security: there is no paid leave, minimal superannuation, and no guaranteed work.

Interpreters and translators, like the Deaf community, are concentrated primarily in metropolitan areas, with very limited availability and varying skill levels in regional, rural and remote locations. Interpreters often must be flown in from metropolitan areas to serve regional communities for critical assignments such as mental health assessments, court or police interpreting, or conferences. The Disability Royal Commission highlighted an ongoing shortage of interpreters—particularly in non-metropolitan areas—not only in absolute terms but also in the number of skilled practitioners suitable for complex assignments.¹

Interpreters and translators are certified by the National Accreditation Authority for Translators and Interpreters (NAATI), with certification levels including:

- **Certified Provisional Deaf Interpreter (CPDI)** – Deaf individuals certified to work between Auslan and non-standard sign languages
- **Certified Provisions Interpreter (CPI)** – hearing individuals certified to work between Auslan and English in generalised contexts (social settings, education)
- **Certified Interpreters (CI)** – hearing individuals certified to work between Auslan and English in more specialised, high-risk settings including legal settings (police and court) and mental health. They must have a minimum 3 years experiences as CPI before applying to be tested at CI level.
- **Certified Conference Interpreter (CCI)** - hearing individuals certified to work either into Auslan or into English at a higher level of proficiency specialising in conferences, health or legal settings.

¹ p77 <https://disability.royalcommission.gov.au/> ; <https://www.health.gov.au/>



- **Recognised Practising Translator (Written English into Auslan)** – deaf individuals have credentials to translate written English into Auslan, and conduct translation of English source documents or videos into Auslan.
- **Recognised Practising Deafblind Interpreter** – hearing or deaf individuals (already NAATI-certified) in Auslan or Deaf interpreting, has credentials as Deafblind interpreter using a range of communication techniques:
 - Tactile sign language
 - Close range signing
 - Visual frame signing
 - Finger spelling
 - Social haptic communication.

Communication guides, as described in the NDIS price guide, are not NAATI-certified and do not possess the professional skills to provide language access. NAATI offers a Community Language Aide test, but this is limited in scope and does not replace an interpreter or translator.

Pre-NDIS Industry Practice

Historically, interpreters and translators were remunerated on a tiered system. Casual practitioners have always been paid hourly, with a minimum two-hour per booking, and rates varied by business hours, evening, weekend and public holiday with fees applying for cancellations within a 24 to 48 hour period. Currently, CPDI and CPI have received an hourly rate of \$50 to approximately \$65 over the last 10 years, CIs \$70 - \$80 and CCI \$80+. Since the introduction of the NDIS price guide and its single capped price, Language Service Providers (agencies) and Sole Traders have shifted almost universally to charging rates at the cap price, regardless of NAATI certification, skills and experience.



Beyond NAATI certification, there is no regulatory authority governing the industry to protect NDIS participants or practitioners.

Issues and Recommendations

1. Classification as ‘consumables’

Translators and interpreters are currently included in the pricing guide under consumables (03_090_0121_1_1). Translators and interpreters are professionals certified by the National Accreditation Authority of Translators and Interpreters (NAATI), we provide a service as contractually agreed to for each individual job assignment. As such, we do not meet the definition of a consumable item and we strongly believe we are incorrectly categorised.

Recommendation

Reclassify interpreters and translators as professional service providers.

2. Removal of cancellation fees

Recent changes have removed the ability for interpreters to claim fees for short-notice cancellations, which has major implications for industry viability and sustainability.

Traditionally, cancellations within 24 hours (48-hours for education booking) have been billed at 100% to compensate for the impossibility of finding replacement work at such notice. Without this, interpreter incomes are threatened, making the career less sustainable and further deterring practitioners from working in or remaining in the field.

This insecurity may push interpreters to avoid longer bookings or higher-risk NDIS appointments, limit participants choice, and encourage adoption of less suitable communication options. Evidence suggests that financial insecurity is a



major factor in workforce attrition²³ and the removal of the cancellation fees further impacts the viability of interpreting as a profession.

Recommendation

Restore the right to claim for short notice cancellations.

3. Removal of two-hour minimum paid times

Removing the two-hour minimum makes many short assignments financially unviable, especially factoring in unpaid time for travel, preparation, and administration. Consequences include interpreters declining short appointments, leaving participants to rely on less suitable communication options. To compensate, some participants may request longer bookings than necessary, creating inefficiencies and placing more burden on the already limited supply of skilled interpreters and translators.

Minimum payments help offset inherent unpaid time in travel, administration, and professional development.

Recommendation

Reinstate the two-hour minimum payment.

4. Removal of paid travel time

Most interpreters are based in metropolitan areas, while many job assignments and participants are outside city limits. Without paid travel time or mileage, interpreters are likely to decline regional or inconveniently-placed jobs which underserves participants in already disadvantaged areas. This further exacerbates inequity in access to interpreting services and therefore access to the community and supports.

² Heuston and Dillon (2024) ASLITA National Conference presentation; Aurbach (2022) Report into interpreter job engagement and satisfaction.

³ <https://ausit.org/wp-content/uploads/2025/07/Language-Services-Sector-Interpreter-and-Translator-Practitioner-Survey-Report-Key-Findings.pdf>



Recommendation

Reintroduce compensation for travel time and costs.

5. Lack of pricing structure

The lack of a tiered pricing structure means both new and highly experienced interpreters are able to charge the same rates, despite vast differences in skills and responsibilities. There is no incentive for practitioners to pursue advanced qualifications, especially since costs for professional development and recertification are borne personally. Only CI and above are suitable for high-risk assignments, yet expertise is not properly recognised or rewarded.

Language Service Providers cannot bill separately for the administrative overhead required for booking and coordination. Instead, charging the maximum allowed within the system for the line item of interpreting or translating, unit limit of \$135.74 and passing on a portion of that to remunerate the interpreter or translator.

Sole Traders cannot bill for the administrative time involved in organising requests for interpreting and translating and invoicing for work.

The language within the NDIS Price Guide, 'unit', does not naturally reflect industry standards of charging hourly rates. Interpreting and translating services are not measured in any meaningful way in 'units'.

Recommendation

Introduce pricing structures and line items that account for different certification levels and the administrative costs of providing services.

Replace 'units' as the unit of measure to per hour.

6. Differentiation of the role of Communication Guide

Communication Guides serve a role distinct from that of an interpreter or translator. Interpreters and Translators are professionally trained and assessed



by NAATI to deliver accurate, impartial language interpretation across critical settings, bound by strict ethical standards. Communication Guides are not NAATI certified interpreters – their role is to assist with general communication and daily tasks.

The incorrect use of Communication Guides risks miscommunication, breaches of confidentiality and ultimately the safety of the participant. Within the NDIS, limited understanding has led to Communication Guides being used as a cost-effective substitute, reinforced by rising pay rates despite lacking formal qualifications and credentials. To safeguard equitable access to trained interpreters for Deafblind, Deaf and hard of hearing participants, a clear distinction between the roles should be adhered to and NDIS pricing to reflect the quality and standard of work involved.

Recommendation

That a separate role, category, description and pricing structure be established for Communication Guides to recognise that their work is distinct from that of interpreters and translators, and that they do not bear the ongoing costs required to maintain NAATI certification and continued professional development that interpreters and translators must bear.

7. Lack of Training and Resources

To date, the NDIA has not provided any information or training sessions or resources for interpreters and translators to understand their obligations and requirements under the NDIS. The above changes have been implemented with no information provided for Sole Traders or Language Service Providers to understand the changes and the rules for example, service agreements and invoicing.

Recommendation

Develop accessible, easy to find and attend community workshops, educational videos and information resources for interpreters and translators to understand NDIS rules and their obligations within the scheme.



Collaborate with ASLITA to disseminate upcoming changes and relevant information and resources to upskill the workforce, to better comply with NDIS rules and regulations.

Conclusion

ASLITA recommends that the NDIA recognises interpreters and translators as professionals, restores industry-standard cancellation and travel provisions, reinstates minimum booking times, introduces a tiered pricing structure, and allows for separate billing of administrative costs. These measures will sustain the viability of the profession, ensure continued access for Deaf, hard of hearing, and Deafblind communities, and uphold the quality and equity of NDIS-funded language access.

If you require any further information, please contact the ASLITA National President at the address above.