



# Federation of Ethnic Communities' Councils of Australia

**Feedback on recommendations arising from the Royal  
Commission into Violence, Abuse, Neglect and  
Exploitation of People with Disability**

**9 February 2024**



*FECCA pays its respects to Aboriginal and Torres Strait Islander Elders past and present and recognise the land we live and work upon was never ceded. FECCA proudly supports the Uluru Statement from the Heart and its call for the establishment of a First Nations Voice protected by the Constitution.*

*FECCA acknowledges that our work on behalf of multicultural Australia has learnt from and been enriched by First Nations peoples and organisations. We are committed to continuing to listen, learn and support First Nations peoples in the journey to a more inclusive society.*

## Who we are

The Federation of Ethnic Communities' Councils of Australia (FECCA) is the national peak body representing people from multicultural communities and their organisations across Australia. Through the membership of state, territory, and regional councils, we represent over 1,500 community organisations and their members.

## What we do

For over 40 years, FECCA has proudly worked alongside culturally and linguistically diverse communities, the broader Australian society and government to build a successful, productive and inclusive multicultural Australia where everyone, no matter their background or how long they have lived in this country, has the opportunity to belong and reach their full potential.

FECCA draws on the lived experiences of the people and their descendants who have migrated to Australia and the expertise of its extensive and diverse membership to develop and promote inclusive, innovative and responsible public policy that reflects the needs and perspectives of multicultural Australia. We are committed to building a strong, innovative and inclusive nation that harnesses its greatest strength, the diversity of its people.

## Foreword

FECCA thanks the Federal Government for the opportunity to provide feedback on the recommendations arising from the Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability (the Royal Commission).

As the peak body representing the interests of Australia's diverse multicultural communities, FECCA is a strong advocate for the delivery of and access to high quality language translation and interpretation services. We have a long history of leadership in the language sector. Our thought leadership includes key reports such as the [Bilingual and Bicultural Workers report](#), the [scoping report on the sector and key recommendations](#) and [the use of language services in aged care](#). During the COVID-19 pandemic, FECCA was funded by the Department of Health and Aged Care to develop [protocols for translation of community communications](#) in partnership with the Australian Institute of Interpreters and Translators (AusIT). Acknowledging FECCA's leadership in the sector, we have been invited to advise the Government through the National Language Services Forum. We use this and other platforms to build pathways for sustainable language services and assert the need for the development of a national language policy, as outlined in our submission to the [Multicultural Framework Review](#).

For further enquiries, please contact FECCA CEO Mary Ann Geronimo at [ceo@fecca.org.au](mailto:ceo@fecca.org.au) or on (02) 6282 5755.

## Introduction

The 2021 Census reveals more than half of Australian residents (51.5 per cent) were born overseas or have at least one parent born overseas; and over 5.5 million Australians speak a language other than English at home. This represents 22.8 per cent of Australia's population speaking a language other than English at home, up from 21.8 per cent in 2016. Of those who spoke a language other than English at home, 71.8 per cent were first-generation Australians.<sup>1</sup>

Australia's Multicultural Access and Equity Policy sets out to ensure that Australian Government programs and services meet the needs of all Australians, regardless of their cultural and linguistic

---

<sup>1</sup> <https://www.abs.gov.au/media-centre/media-releases/2021-census-nearly-half-australians-have-parent-born-overseas>

backgrounds. It acknowledges that Government services and programs must be responsive to the needs of our culturally diverse communities.

Despite this, people from multicultural backgrounds continue to face barriers to accessing services across government agencies. Barriers to access can include a lack of or inadequate in-language information; lack of information in plain English; increased online services and limited face-to-face service provision; limited awareness and use of the national Translation and Interpreting Service (TIS) and other interpreting and translating services; and limited cultural competency among front-line staff.<sup>2</sup> In order to ensure multicultural communities have access and equity in service delivery, FECCA calls for strengthening the interpretation and translation sector through improving work conditions, wages, setting enforceable industry standards and enacting a national language policy.

## Language Services Recommendations

FECCA supports the overall recommendations of the Royal Commission on language services as they address critical issues around interpreter access and workforce development. Improving access to language services and developing a skilled workforce of interpreters and translators is crucial for fostering inclusivity and ensuring that people from diverse linguistic backgrounds have equitable access to services. However, some fundamental challenges need to be addressed for the successful implementation of the recommendations. We make the following recommendations to address these challenges:

### Workforce and conditions

**Recommendation 1: Increase full-time interpreter and translator positions.**

**Recommendation 2: Define the roles of interpreters and bilingual / bicultural workers and provide appropriate remuneration to both for the professional deployment of their language and cultural skills.**

**Recommendation 3: Improve working conditions, fostering a culture of respect and appreciation for interpreters' expertise is crucial for the profession.**

### *Insecure employment and low salaries*

The Government provides interpreting services to assist in delivering equitable access to services and information to all citizens. However, the high demand for these services currently outstrips the availability of quality interpretation. This in turn leads to heavy reliance on casual and freelance interpreters, creating significant job insecurity for many language services practitioners. In this environment many practitioners are forced to operate as freelancers, struggling to make a living wage due to low hourly rates, travel and associated costs. This makes it difficult for interpreters to maintain a stable income.<sup>3</sup> As a result, many qualified practitioners are driven away from the profession. This high turnover and shortage of language practitioners threatens access to quality language services, leaving communities vulnerable inequitable access to Government services.

For instance, in the Aged Care sector, FECCA has heard aged care service providers express various challenges such as long wait times to access interpreters and their lack of experience in accessing TIS National services.

---

<sup>2</sup> [Multicultural Framework Review](#)

<sup>3</sup> <https://www.anao.gov.au/work/performance-audit/management-interpreting-services>

*'One of our Connectors has just advised me that, yet another CHSP provider has said that potentially they will reject due to language barriers. They advised that they could use TIS, but it would be easier for them to directly contact our casual Bilingual Support Worker rather than using TIS (to support a client with service registration/intake) – their excuse being there can be a long waiting period on hold on the phone'.*

From an EnCOMPASS (Aged Care Navigation project) partner organisation

FECCA has also received reports about the low annual income benchmark of \$50,000 for interpreters. This benchmark significantly underestimates the demands and responsibilities of the profession, making interpreting uncompetitive with other industries that require similar qualifications and expertise.

To attract and retain top talent, the interpreting workforce strategy should prioritise professionalisation and competitive salaries. This means shifting away from relying on experience recognition and accreditation and taking steps towards establishing, enforcing, and upholding rigorous industry standards that emphasise<sup>4</sup>:

- Professionalism, by upholding ethical conduct and fostering a culture of continuous improvement.
- Competence, by ensuring interpreters possess the necessary skills and qualifications to deliver high-quality services.
- Fair compensation, by recognising the expertise and responsibilities of interpreters with competitive salary structures.

To build the supply of interpreters in the face of growing demand, some Language Service Providers (LSPs) engage untrained and uncertified bilingual speakers as interpreters. Some also work with overseas-based interpreters with no contextual knowledge of factors affecting a successful interpreting service with a person with disability. For LSPs, these options come at a cheaper cost. However, it undermines the quality of interpretation services. Some interpreters often lack the professional grounding and commitment to ethical practice necessary for optimal service quality.

FECCA recognises bilingual workers, bicultural workers, interpreters, and culturally competent general staff, are key to and play differing professional roles within the language services ecosystem. A cohesive strategy on language services must consider how existing bilingual / bicultural aged care workforce can complement the use of interpreting services. FECCA recommends sustaining the Linguistic Availability / Performance Allowance (LAPA) program which is implemented for existing bilingual / bicultural aged care workforce. Our recommendation on this can be found [here](#). To ensure that needs-based, appropriate language services are provided to all those who need it, FECCA recommends the roles of interpreters and bilingual / bicultural workers are clearly defined and both supported with the appropriate remuneration for the professional deployment of their language and cultural skills. This approach would guarantee a steady pool of professionals, and elevate the profession's value, justifying competitive salaries.

### **Poor working conditions**

While competitive salaries are crucial for attracting and retaining talented interpreters, creating a safe, respectful, and professional working environment is equally important. During our consultations, FECCA regularly hears experiences of poor working conditions, particularly in the

---

<sup>4</sup> <https://jccd.org.au/wp-content/uploads/2022/05/JCDD-Recommended-National-Standards-for-Working-with-Interpreters-in-Courts-and-Tribunals-second-edition.pdf>

courts. Specific concerns include the lack of support and recognition, disrespect towards interpreters and lack of access to information.<sup>5</sup>

These negative experiences discourage skilled professionals from entering or remaining in the field, ultimately impacting service quality and access. Therefore, the proposed workforce strategy should promote recognition, fostering a culture of respect and appreciation for interpreters' expertise is crucial for the profession.

## Quality

**Recommendation 4: Strengthen complaints mechanisms to ensure poor quality translation and interpretation can be reported by consumers accessing the service.**

### *Quality of translation services*

The capability of interpreters to provide culturally safe and respectful language service, particularly over the phone is inconsistent. Aside from NAATI (National Accreditation Authority for Translators and Interpreters) accreditation or equivalent recognition (both general or specialising in health or legal sectors), little has been reported on professional development and quality assurance to ensure that interpreters are equipped with adequate skills and knowledge. While this approach is well-intentioned and aims to address the gap in the sector, it carries unintended consequences for users by compromising the standard of interpretation being delivered.

Instances of poor-quality translation services are common, and seemingly minor errors can have significant repercussions. We saw this during the COVID-19 pandemic, where inaccurate translations hindered vital information dissemination to multicultural communities, putting them at serious risk.

### *Complaints mechanisms*

The impact of poor-quality interpretation services is exacerbated by the fact that some members of multicultural communities may lack familiarity with formal complaint mechanisms, leaving them voiceless when faced with inadequate translations. They are unable to navigate official channels to report poor quality interpreting services.

Additionally, while existing government mechanisms may address individual interpreter issues, they fail to effectively hold service providers accountable for poor quality translation services. This lack of accountability erodes public trust in complaint outcomes, further weakened by the absence of a centralised oversight mechanism. This lack of transparency reduces trust in government by multicultural communities.

Building trust and ensuring effective policy implementation require robust safeguards, including establishing an independent oversight on complaints mechanism. To ensure impartial and transparent investigations of complaints, it is equally important to ensure that the complaints mechanisms are culturally safe and accessible. This should be considered alongside implementing consequences for poor service quality, such as fines or other sanctions, incentivising providers to prioritise quality service and improve accountability.

Alongside these accountability measures, maintaining high standards for interpreters is crucial. This means valuing both formal qualifications and relevant experience to ensure competent and qualified professionals deliver accurate and nuanced translations.

---

<sup>5</sup>[ia.professionalsaustralia.org.au/Interpreters/News/New%20Campaign%20for%20Australia's%20hardworking%20translators%20and%20interpreters%20launches%20today.aspx](http://ia.professionalsaustralia.org.au/Interpreters/News/New%20Campaign%20for%20Australia's%20hardworking%20translators%20and%20interpreters%20launches%20today.aspx)

## National language policy

### Recommendation 5: Develop a national language policy.

#### *Building inclusion with a National Language Policy*

Australia's dynamic multicultural landscape necessitates the establishment of a robust language policy that not only embraces the rich linguistic diversity but also promotes effective communication for all Australians, irrespective of their ethnic backgrounds. A language policy would play a key role in developing and maintaining identity. Losing a language is like losing a piece of one's heritage, identity, and community spirit. Language allows us to connect with our families, engage in our communities, and contribute meaningfully to the national conversation. While English plays a vital role, Australia is far more than just an English-speaking nation, it worth noting that over 400 languages spoken across the country.

Additionally, nearly one million Australians face significant challenges due to limited or no English proficiency. This growing demand for quality interpreting services exposes a critical shortage of qualified professionals<sup>6</sup>. While Government efforts exist to cater to the language needs of multicultural communities and ensure access through translation investments it's time for a fundamental shift in perspective. Communities don't ask to have everything translated but want the flexibility to talk in their language when needed.

Australia currently lacks a comprehensive National Language Policy. This leaves valuable guidelines and good practice protocols not effectively enforced, relying solely on the good intentions of those tasked with implementation. [The National Standards for Working with Interpreters in Australian Courts and Tribunals](#) exemplify this vulnerability.

The absence of a language policy can also result in interpretation services that may be inconsistent and reinforce potential biases, potentially undermining access and equity issues for the people and communities who rely on them. Without a national policy, millions of Australians are potentially at risk of exclusion or minimum access to essential services, participating fully in public life, or engaging meaningfully in society due to language barriers.

Languages other than English must be perceived as valuable assets rather to the nation. This shift in perspective acknowledges the significant contributions that bilingual individuals bring to the workforce and society. As highlighted in our [Multicultural Framework Review](#) submission, a comprehensive official language policy is the key to unlocking a truly inclusive and prosperous Australia.

#### *International cases*

Australia should look to and learn from international examples such as South Africa and Canada, which have successfully developed and implemented national language polices.

South Africa's 11 official languages demonstrate the power of multilingualism in deepening democracy and boosting social, cultural, and economic vitality. Section 6 of the nation's Constitution guarantees equal status to 11 official languages, with all official languages constitutionally equal. This policy ensures citizens can access government services and information in their preferred language, fostering inclusive communication and engagement.<sup>7</sup>

---

<sup>6</sup> <https://www.abc.net.au/listen/programs/lawreport/interpreters-court/102595632>

<sup>7</sup> [https://www.gcis.gov.za/sites/default/files/images/resource\\_centre/GCISLanguagePolicyJune2016.pdf](https://www.gcis.gov.za/sites/default/files/images/resource_centre/GCISLanguagePolicyJune2016.pdf)

Similarly, Canada's bilingualism, enshrined in the *Official Languages Act (1969)*, guarantees English and French speakers' equal opportunities in federal institutions and services. The Act sets out three broad principles concerning respect for official languages in the federal public service: the right of Canadians to communicate with and receive services from federal institutions in the official language of their choice, subject to certain conditions; the right of employees of federal institutions to work in the official language of their choice, in certain places; and the government's commitment to ensure English- and French-speaking Canadians have equal opportunities for employment and advancement in federal institutions. Canada's commitment to bilingualism is further evidenced by dedicated funding for language education programs in schools and communities across all provinces.<sup>8</sup>

---

<sup>8</sup> [https://link.springer.com/10.1007/978-0-387-30424-3\\_24](https://link.springer.com/10.1007/978-0-387-30424-3_24)