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1. Introduction

- 1.1 The Regulatory Centre for Irish Sign Language Interpreters Ireland CLG has been established for the purpose of maintaining the Register of Irish Sign Language Interpreters (RISLI), a voluntary, national, professional register.

- 1.2 A person who wishes to provide Irish Sign Language interpretation for a court or public body in Ireland must have their competence verified as having been accredited by RISLI. This is referred to in the Irish Sign Language Act of 2017.
- 1.3 This document sets out the procedure for considering complaints made to RISLI about an interpreter registered with RISLI.

2. Preliminary

The Complaints Officer

- 2.1 The consideration of complaints will be carried out by a Complaints Officer. A Complaints Officer is a person or persons appointed or instructed by RISLI, to act as Complaints Officer to consider complaints. They may be a practicing solicitor or barrister but do not have to be.
- 2.2 The Complaints Officer may be assisted by a member of the Registration Panel of RISLI with experience of interpreting, where the Complaints Officer deems this necessary.
- 2.3 The consideration of appeals will be carried out by a different Complaints Officer, not previously involved in the complaint. The Complaints Officer may be assisted by a different member of the Registration Panel of RISLI with experience of interpreting, and who has not previously been involved in the complaint. This will be done where the Complaints Officer deems it necessary.
- 2.4 The Complaints Officer may seek assistance from one or more of the RISLI staff, who will be responsible for administration. In addition, the Complaints Officer may seek assistance from a member of the Deaf community in the consideration of the complaint.

Interpretation/Translation

- 2.5 Information will be interpreted/translated into English/Irish Sign Language as required or requested.

Confidentiality

2.6 The consideration of complaints and appeals is strictly private and confidential. All parties involved in a complaint are requested to treat the complaint as confidential.

Brief details about complaints may be published, for example in the annual report. The information published may include:

- The number of complaints we receive each year
- What each complaint was about, for example a breach of confidentiality or poor professional conduct
- The outcome of the complaint

Any publication will not include information which would identify the persons involved.

Any sanction decided on may be reflected on the registrant's interpreter profile on the RISLI website, for a period of time to be specified by the Registration Panel.

3. Grounds for making a complaint

3.1 RISLI considers complaints about registered interpreters ("registrants") on the following grounds:

- (a) An act, omission, or pattern of conduct which is a breach of the code of conduct;
- (b) Poor professional performance.

3.2 Poor professional performance means the following:

The failure of an interpreter to meet the standards of competence that may reasonably be expected.

3.3 For a finding to be made against a registrant, the matter(s) complained about must be serious.

4. Making a complaint

- 4.1 Any person (including RISLI itself) may make a complaint about a registrant. If a complainant withdraws his or her complaint, the Registration Panel may decide to proceed with the consideration of the complaint as if it had not been withdrawn.
- 4.2 A complaint cannot be progressed against an interpreter who is not on the register at the time the complaint is made. In general, complaints about events which pre-date the opening of the register will not be considered, except in limited circumstances.

How to make a complaint

- 4.3
- a) **ISL Video:** By sending a video message in Irish Sign Language ("ISL") to RISLI. The video should cover the questions in the RISLI complaint form. See the complaints form in the Appendix.
 - b) **Meeting RISLI:** By seeking an ISL meeting via videoconferencing, or in person where appropriate, with an ISL interpreter or ISL-fluent staff member present to assist with filling out the complaint form.
 - c) **RISLI Website:** By completing the complaint form on RISLI's website.
 - d) **Post or Email:** By filling out the complaint form and sending the completed form to RISLI via post or email.

5. Consideration of complaints

Review by RISLI Staff member

- 5.1 When a complaint is received, a member of staff of RISLI may, where necessary, engage with the person making the complaint. The staff member may need to clarify aspects of the complaint and ensure that the complainant wishes to proceed with their complaint. If the consideration of the complaint is to proceed, the complaint will then be sent to a Complaints Officer.

Consideration by Complaints Officer

- 5.2 At any time during the consideration of the complaint the Complaints Officer may decide not to give further consideration to a complaint. The Complaints Officer will do this if they are of the view that:

- a) The complaint is trivial, or minor in nature.
- b) The complaint is vexatious, made in bad faith, or an abuse of process.
- c) The complaint is more properly addressed to another body or individual or is not within RISLI's remit.

The Complaints Officer will inform the complainant and registrant and will provide reasons for their decision.

The consideration of the complaint by RISLI will be at an end.

- 5.3 If the Complaints Officer decision to proceed with the consideration of the complaint, the registrant who is the subject of the complaint will be notified in writing that a complaint has been received, and that it is being considered.
- 5.4 The registrant will be provided with a copy of the complaint.
- 5.5 Once the Complaints Officer has decided to proceed with the complaint (see 5.2 above) the registrant will be informed that they may submit a response to the complaint. The Complaints officer may ask the registrant to submit this response within a specific period time.

Seeking further information on the complaint

- 5.6 When considering a complaint, a Complaints Officer may:
 - a) Seek further information or documentation from the registrant or complainant.
 - b) Request any person or organisation to provide information, documents, or other evidence which the Complaints Officer considers relevant to the consideration of the complaint.
 - c) Where appropriate, take statements or seek accounts from relevant witnesses.
 - d) Obtain any expert evidence, or assistance as the Complaints Officer deems necessary.
 - e) Take such reasonable steps as the Complaints Officer deems necessary for the consideration of the complaint.

- 5.7 The registrant will be provided with all documentation received by the Complaints Officer. The registrant will be given an opportunity to submit a response before the Complaints Officer is ready to make the final decision on the complaint.
- 5.8 After providing all documentation to the registrant and giving them an opportunity to submit a response the Complaints Officer may seek further information on the complaint (see 5.6 above). If the Complaints Officer receives further information on the complaint (as in 5.6 above), this information will be provided to the registrant (as in 5.7 above).
- 5.9 On receipt of any final response from the registrant the Complaints Officer may:
- a) Decide that there is no case to answer (no prima facie case), and that no further steps should be taken. The Complaints Officer will provide reasons for their decision. The consideration of the complaint by RISLI will be at an end; or
 - b) Decide that there is case to answer (a prima facie case), and a notice will be sent to the registrant.

The Complaints Officer will inform the complainant and registrant of his or her decision.

Notice sent to the Registrant

- 5.10 The Complaints Officer will prepare a notice which will outline all the allegations. The notice will be sent to the registrant.
- 5.11 The Complaints Officer may still seek further information on the case (as in 5.6 above). This can be done before or after sending the notice to the registrant.
- 5.12 All information and documentation gathered will be provided to the registrant, and they will be given an opportunity to submit a response in advance of the Complaints Officer making a final decision on the complaint.

Evidence Hearing

- 5.13 The Complaints Officer may convene an Evidence hearing, if the Complaints Officer deems it appropriate to do so. The Complaints Officer may seek the views of the

complainant and registrant. At an Evidence hearing, the complainant, or any other witness, individual or expert involved in the complaint whose evidence is required, may be asked to attend. The registrant will be invited to attend and may question and cross-examine witnesses or call his or her own witnesses. Evidence hearings will take place in person, unless the Complaints Officer deems it more appropriate to hold the Evidence hearing remotely, or in a hybrid manner Evidence hearings will take place in private unless the registrant requests that it takes place in public, and the Complaints Officer believes that it would be appropriate, having taken into account the views of the Complainant and any witnesses. If it is decided to proceed in public, the Complaints Officer may decide to anonymise any individual or entity involved, including any information which could identify that individual or entity, if they deems it appropriate.

Complaints Report

5.14 The Complaints Officer may make findings in respect of whether there has been:

- a) an act, omission, or pattern of conduct which is a breach of the code of conduct and/or
- b) poor professional performance on the part of the registrant.

The decision and reasons for the decision will be recorded in a Complaints Report, which will be provided to the registrant and to the complainant.

5.15 In the event that a finding(s) is made in respect of the registrant, the Complaints Officer may decide to do one or more of the following:

- a) Request the registrant to undertake not to repeat the conduct to which the complaint relates, or request other undertaking(s) the Complaints Officer deems appropriate.
- b) Issue a formal written warning to the registrant.
- c) Admonish the registrant in writing.
- d) Attach conditions to the registration of registrant for a specified period.
- e) Suspend the member from the register for a specified period.
- f) Remove the registrant from the register.

6. Appeal

6.1 A registrant may appeal a decision made under paragraph 5.13 and/or 5.14. Any appeal shall be made within 21 days of receipt of the Complaints Officer's decision.

The Appeal will be considered by a Complaints Officer not previously involved in consideration of the complaint.

- 6.2 The Complaints Officer may seek further information on the complaint (as in 5.6 above), where the Complaints Officer deems it necessary to do so.
- 6.3 Any additional information and documentation gathered will be provided to the registrant, and they will be given an opportunity to submit a response in advance of the Complaints Officer making a final decision on the appeal.
- 6.4 The Complaints Officer may convene an Evidence hearing, if the Complaints Officer at his or her discretion deems it appropriate to do so. The Complaints Officer may seek the views of the complainant and registrant in this regard. At an Evidence hearing, the complainant, or any other witness, individual or expert involved in the complaint whose evidence is required, may be asked to attend. The registrant will be invited to attend and may question and cross-examine witnesses or call his or her own witnesses. Evidence hearings will take place in person, unless the Complaints Officer deems it more appropriate to hold the Evidence hearing remotely, or in a hybrid manner. Evidence hearings will take place in private unless the registrant requests that it takes place in public, and the Complaints Officer believes that it would be appropriate, having taken into account the views of the Complainant and any witnesses. If it is decided to proceed in public, the Complaints Officer may decide to anonymise any individual or entity involved, including any information which could identify that individual or entity, if they deem it appropriate.

Decision on the Appeal

- 6.5 The Complaints Officer may:
 - a. Confirm the decision(s) the subject of the appeal in whole or in part.
 - b. Annul the decision(s) the subject of the appeal in whole or in part, and make a new decision(s) as appropriate.
 - c. Give other directions as it considers appropriate.
- 6.6 At any stage during the consideration of an appeal, the Complaints Officer may request that a member of the Registration Panel with experience of interpreting be appointed to consider the appeal with the Complaints Officer. This would mean that there would be a panel of two persons (the Complaints Officer and Registration Panel member) considering the appeal and making collective decisions from that point on.

7. The Registration Panel

- 7.1 The Registration Panel will be notified of the outcome of a complaint or appeal. The Registration Panel will be provided with all reports prepared by the Complaints Officer(s). These reports may be anonymised where appropriate.
- 7.2 The procedures may be amended by the Registration Panel from time to time.

Consultation

Appendix – The Complaints Form

You can complete this form:

1. in written English or
2. by sending us an Irish Sign Language Video.

This form has three parts. Part 1 is about you. Part 2 invites you to fill in details about your complaint and Part 3 is a statement we ask you to read and sign. This is followed by information on sending us the completed form, by post, email or by sending an ISL video message by email or by mobile phone.

Part 1: Details about you

Name	
Address	
Mobile number	
Would you prefer us to only text you?	Text only <input type="checkbox"/> Text and Phonecalls <input type="checkbox"/>
Email address	

Part 2: Details about your complaint

1. Who is the interpreter you are complaining about?

2. When did the incident happen?

Date:
Time:

3. Where did it happen?

4. What happened? Please give a lot of detail if you can. You can send the information in ISL or written English.

5. Were any other people there? Yes No

Did they see what happened? Yes No

If yes, please write their names, and, if you have their permission, include their contact details if you know them.

Name 1:
Contact details

Name 2:
Contact details

Desired results of complaining

6. What do you want RISLI to do about the complaint?

Part 3: Your statement

Please tick the box and sign and date below.

To the best of my knowledge, I confirm that all the information I have given in this application form was accurate at the time I completed this form.

Signed: _____

Date: _____

Where to send your completed form or ISL video

Please send this form, and any other documents or ISL video to:

Post

Register of Irish Sign Language Interpreters (RISLI),
Deaf Village Ireland,
Ratoath Road,
Dublin 7 D07 W94H

Email

admin@risli.ie

Phone

086 138 0180

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