

## **Annex One:**

*Relating to subcontracting practices and NAATI credential compliance within interpreting and translation services procured by the Ministry of Education (Te Tāhuhu o te Mātauranga).*

### **SECTION A: SUBCONTRACTING ARRANGEMENTS**

- 1. Whether the Ministry of Education's interpreting and translation providers are permitted to subcontract assignments to third parties, including overseas-based agencies or individual contractors located outside New Zealand.*
- 2. Any conditions or restrictions in the Ministry of Education's contracts with interpreting and translation providers regarding the use of subcontractors, including any requirements that subcontractors be based in New Zealand or hold an appropriate New Zealand work visa.*
- 3. Whether the Ministry of Education requires providers to disclose the identity, location, or credentials of individual interpreters or translators — including subcontractors — who carry out assignments on the Ministry's behalf.*
- 4. Whether the Ministry of Education has any knowledge of, or has sought information about, assignments being routed to interpreters or translators located outside New Zealand.*
- 5. Any instances where the Ministry of Education became aware that an assignment was conducted by a person located outside New Zealand or by an uncredentialed subcontractor, and any action taken as a result.*

### **SECTION B: NAATI CREDENTIAL COMPLIANCE**

- 6. What mechanism, if any, the Ministry of Education uses to verify that individual interpreters and translators carrying out assignments on its behalf — including those engaged through subcontracting arrangements — hold a valid NAATI credential or Working Towards NAATI (WTN) status.*
- 7. Whether the Ministry of Education requires its interpreting and translation providers to maintain and supply a current register of credentialed practitioners working under Ministry contracts, and if so whether the Ministry has received and reviewed such registers.*
- 8. Any audits, spot checks, or compliance reviews conducted by the Ministry of Education on its interpreting and translation providers since 1 July 2024 to verify NAATI credential compliance, including the methodology and findings of any such reviews.*
- 9. Any instances since 1 July 2024 where a provider was found to have used an interpreter or translator who did not hold the required NAATI credential or Working Towards NAATI (WTN) status, and any consequences or remedial action taken.*

10. *Any complaints received by the Ministry of Education since 1 July 2024 from staff, students, families, or members of the public regarding the qualifications or conduct of an interpreter or translator engaged through the Ministry's services.*

#### **SECTION C: INTERPRETER AND TRANSLATOR PAY VISIBILITY**

11. *Whether the Ministry of Education has any information about the rates or fees paid by its providers to individual interpreters or translators for assignments conducted on the Ministry's behalf.*

12. *Whether the Ministry of Education has ever sought, as part of contract negotiations, tendering processes, or performance reviews, any information about the pay or working conditions of interpreters or translators engaged through its provider contracts.*

13. *Any internal policies, briefings, risk assessments, or correspondence within the Ministry of Education regarding the fair remuneration or employment conditions of interpreters and translators working under its contracts, including any concerns raised about the margin between rates paid to providers and rates passed on to practitioners.*

14. *Whether the Ministry of Education's tendering or procurement criteria for interpreting and translation services include any consideration of whether providers pay practitioners at or above a minimum rate, living wage, or industry standard.*