



29 April 2026

P. Peach

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Kia ora P. Peach

**Transfer of request for official information, reference: GOV-047109**

Thank you for your email of 28 March 2026, asking for the following information under the Official Information Act 1982 (the Act):

*I am requesting the following information under the Official Information Act 1982 relating to subcontracting practices and NAATI credential compliance within interpreting and translation services procured by the Accident Compensation Corporation (ACC / Te Kaporeihana Āwhina Hunga Whara).*

**SECTION A: SUBCONTRACTING ARRANGEMENTS**

- 1. Whether ACC'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 ACC'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 ACC requires providers to disclose the identity, location, or credentials of individual interpreters or translators — including subcontractors — who carry out assignments on ACC's behalf.*
- 4. Whether ACC has any knowledge of, or has sought information about, assignments being routed to interpreters or translators located outside New Zealand.*
- 5. Any instances where ACC 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, ACC 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 ACC requires its interpreting and translation providers to maintain and supply a current register of credentialed practitioners working under ACC contracts, and if so whether ACC has received and reviewed such registers.*
- 8. Any audits, spot checks, or compliance reviews conducted by ACC 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 ACC since 1 July 2024 from staff, claimants, or members of the public regarding the qualifications or conduct of an interpreter or translator engaged through ACC's services.

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

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

12. Whether ACC 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 ACC 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 ACC'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.

If any part of this request is refused, please:

- Identify the specific OIA provision relied upon for each withholding;
- Consider whether the public interest in transparency around publicly funded services and the fair treatment of workers outweighs any commercial sensitivity; and
- Release any information that can be made available in redacted or aggregated form.

This request is being transferred in full to the Ministry for Ethnic Communities for response because ACC understands the information is more closely connected with their functions. This decision was made under section 14 of the Act.

If you have any questions about this transfer, you can email me at [GovernmentServices@acc.co.nz](mailto:GovernmentServices@acc.co.nz).

Ngā mihi



Nicky Judd

**Manager Official Information Act Services**

Government Engagement