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Translation as a sub-set of public and social policy and a consequence of multiculturalism: the provision of translation and interpreting services in Australia

Abstract: Translation can be an overt feature of public policy, typically in situations where there are status planning regulations that prescribe the use of two or more languages that then enable the development of translation infrastructure. In New World countries, one language, usually that of a former colonial power, is the *de jure* or *de facto* official language and seldom does translation feature as a national policy in its own right. Accounts for the provision of translation in a country such as Australia are to be found elsewhere. This article adopts a "looking sideways" approach to account for the provision of translation in a range of settings – healthcare, welfare, court/police, etc. In these areas, and since the introduction of *multiculturalism* in the mid-1970s, linguistic diversity of the Australian populace has been a component of policy formulation and the provision of translation has become a means for policy to be implemented. A national policy on languages that expressly includes translation does exist in Australia. However, it is the cross-portfolio convention of addressing language barriers in the provision of government services and beyond that accounts for translation. It is here conceptualized not so much as a cultural-linguistic value, but as a means for service delivery.

Keywords: translation policy, interpreting, public policy, multiculturalism

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1 Introduction

This article looks at translation – understood here as a hypernym that encompasses translation and interpreting (spoken and signed) – and public and social policy. The coupling of "public and social policy" with "translation" foregrounds the social and political processes that may determine and shape translation and its occurrence. Translation can occur as a "stand-alone" policy, but also as a response to national or local language policy that prescribes or strongly recommends the transfer of texts and their availability in bi- or multi-lingual societies. This is a top-down view of translation with relatively clear hierarchical lines that show a linear path between policy and activity. Translation can also occur without such a language policy. This raises the questions, how and why other areas of policy may lead to the need for and provision of translation as an outcome where this is otherwise not readily anticipated. The kind of view needed to account for translation in these circumstances is a "looking sideways" approach that locates elements of public and social policy that have particular desired outcomes, with translation functioning as a secondary activity that serves another, primary goal. These two views are not mutually exclusive: language policy that sets out the provision of translation as an attribute of a society's cultural-linguistic heritage can invoke other, "flow-on" benefits; public and social policy in general can refer to language policy where this exists and can foreground elements congruent to its own goals.

The title of this article suggests that we will be engaging in a "looking sideways" approach to translation in the country that we are focusing on, Australia. Australia is a country that has had, since the mid-1970s, a national policy of multiculturalism that is based on the desire for social cohesion and for the integration of diverse groups of people within the Australian populace. It also functions as a means of self-identification, both internally and outwards towards the rest of the world, e.g. "We are a multicultural country". A manifestation of cultural diversity is linguistic diversity, and with the advent of multiculturalism, linguistic diversity, by default, became an attribute of this national policy. This would lead one to think that translation itself should feature prominently as a policy in its own right, as it enables exchange between linguistically diverse groups. This kind of "top-down" view as a means of policy formulation for the provision of translation is not readily confirmed: a national language policy does exist that advocates translation and interpreting services, but the provision of these can perhaps seldom be attributed to the language policy itself. Instead, it is other areas of public policy that appear to account for their provision and this article adopts a "looking sideways" approach to these.

Further, we look at the provision of translation and interpreting (hereafter: "T&I") services in a concrete sense based on empirical data. This aspect of the article is a bottom-up perspective that looks at T&I at "the coalface" (O'Rourke and Castillo 2009). The purpose of looking at statistical data on the frequency and areas of provision of T&I services is to see if and how this provision relates to policy that is otherwise not language-focused, but that advocates accessibility of services to all residents. We look at the relationship between policy and provision of services, and consider how service needs "at the coalface" inform and shape policy. This understanding of policy is one that is both reflective of "things on the ground" in a real sense (as well as anticipatory of things to come) and also ideologically contextualized by way of the political positions of the policy-makers and/or the "popular opinion" of the day. The research questions that this article addresses are:

– How can we relate policy that is not primarily language-focused to the provision of T&I services?
– Can we account for such policy coming about through a theoretical model?
– When we look at translation and interpreting services in Australia, which instruments (e.g. legal precedents, guidelines, regulations) are invoked that appear to account for the provision of services, and which areas record what kind of levels of provision?

The following section presents concepts relating to language policy and translation policy, their definitions and a discussion of approaches within the discipline of Policy Studies. Section 3 gives a historical outline of the development of official policy on language use, including that of T&I in Australia, which today remains probably the most progressive policy document passed by a government on multilingualism and T&I that has received governmental sanction across the Anglophone world. A framework model from Policy Studies is applied descriptively to the development of this policy in order to provide an explanatory account for its emergence. Section 4 examines aspects of social and public policy *outside* language (and T&I) policy that have been instrumental in the provision of translation and, particularly, interpreting services across many areas of government service provision. Section 5 presents statistics on the total number of service requests for interpreting from the largest T&I agency in Australia and a sector-specific break-down of requests. The largest sector in which interpreting services are provided in Australia is healthcare. Sector-specific regulations are presented, together with data on requests for service and ability to meet service requests. Section 6 re-visits the political, macro-social and legislative features, both those that expressly relate to language and T&I, and those that are outside

this but which determine the provision of services. Translation policy is here conceptualized as a dynamic process and multi-party activity.

2 Background concepts and discussion

In a basic sense, this article explores the notions "translation" and "policy" and their co-occurrence, i.e. whether translation is always performed within the realm of some kind of policy, either *de jure* or *de facto*; and whether translation always transpires where policy appears to prescribe or at least advocate it.[1] The compound term "translation policy" appears to be a term of comparatively recent vintage (Toury 1995/2012; Krouglov 1997; Meylaerts 2007).[2]

As a preliminary, a definition of the term "public policy" is provided here from the field of Policy Studies as "an officially expressed intention backed by a sanction, which can be a reward or a punishment" (Lowi and Ginsberg 1996: 607). In this article, we employ the term "policy" to refer to both the proposal of a course of action (the "intention") *and* to its implementation (the "reward" or "punishment" *and* the way it is executed). Proposals are rarely intended to remain unexecuted, and our examination of events and data presented in this article is predicated on not only proposals but also actions, where the latter appear to follow or at least be related to the former. (Apparently unproposed or "policy-less" activities related to translation are still looked at in this article.) Proposals and their implementation need not be carried by a state or governmental organization, but they commonly are, and only where this is not the case will such (non-governmental) actors be expressly mentioned.

A further preliminary to our discussion of "translation policy" is the term "language policy" and the parallels with (and differences from) the former. Language policy is not co-terminous with the phrase "language planning", but one aspect of language planning – status planning – is often a pre-condition for an understanding of translation policy. Language planning in its most widely used meaning refers to two processes: corpus planning and status planning

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1 This article does not deal with micro- or macro-practice-based notions of "translation policy" referring to the decisions that a translator makes in the course of the translation of a text (Levý 2000 [1967]).

2 As a macro-social quantity, translation policy was, in the twentieth century, sometimes a subset of language status planning decisions, which were themselves the consequences of political movements: left-wing ideology of "fraternalism between socialist peoples", e.g. the Soviet Union's official policy of translation between the country's languages, usually from Russian (Pleva 2012); or anti-colonial-liberationist movements, e.g. Zimbabwe's language and translation policy since the end of white rule (Kadenge and Nkomo 2011).

(Kloss 1968). Corpus planning refers to the codification or standardization of a language. Status planning refers to the allocation of a language to functional domains within a society, particularly where this is bi- or multi-lingual such that the status awarded to a language variety provides this language with some kind of regulated position (from that of an official national language to that of an officially recognized regional or minority language).

The national or regional regulations that formalize the status of co-official or minority languages facilitate if not prescribe translation as a means to achieve diglossia, especially where societal bilingualism may not be widespread. These top-down regulations can enable the establishment of visible and large-scale T&I infrastructure. A country that straddles the Old World/New World divide, South Africa, has adopted a progressive language policy in its 1997 constitution that affords equal standing to 11 national languages – nine indigenous languages and Afrikaans and English. This languages policy advocates the provision of media in all of the 11 languages, instruction in any of the 11 languages or combinations thereof, and nationally-sponsored translation and interpreting services between the 11 languages. The tacit ascendency of English as the "national lingua franca" is not conducive to some of these policy aims, but the policy has advanced T&I services far beyond those that existed before 1997.

Translation policy can be seen as a sub-set of or consequence of status planning, but it can be shaped by other factors that act independently of each other so that it may be hard to develop a uniform approach to describe its development. In setting out preliminary parameters, Meylaerts (2011a: 163–164) looks firstly at the area of government regulation: "a translation policy is [...] a set of legal rules that regulate translation in the public domain: in education, in legal affairs, in political institutions, in administration, in the media". In further work, Meylaerts (2011b) outlines conventions of translation policy in a cross-national analysis, identifying four "regimes" of practice:

> [...] complete institutional multilingualism with obligatory multidirectional translation in all languages; complete institutional monolingualism and non-translation; institutional monolingualism and translation into the minority language; institutional monolingualism at the local level and institutional multilingualism with multidirectional mandatory translation at the superior [...] level. (Meylaerts 2011b: 749–753)

At the same time, Meylaerts (2011a, 2011b) is also cognizant of the wide range of relatively informal settings in which a translation policy also seems to pertain. She concludes with an appeal that "future research needs to be more interdisciplinary, exploring the complex relations between various translation policies and linguistic justice, integration, equal opportunities" (Meylaerts 2011a: 167). This article is a response to her call to examine processes in, and relations

between, different spheres of public life, and to take into account that translation policy is, as Ozolins (2010: 196) expressed it, often a product of "cross-portfolio policy making".

A discussion of the factors that contribute to the formulation of translation policy is offered by González Núñez (2016). He focuses his analysis on the provision of translation services in the UK for two different groups – autochthonous linguistic minorities (e.g. Welsh, Gaelic) and allochthonous (or immigrant) ones (e.g. Punjabi, Polish) – and initially posits that the provision of such services is premised on language policy: "issues of translation are intractably bound up with language policy". This position needs some clarification for a country such as the UK that, for example, appears to have few obvious characteristics of a language policy,[3] and no mention of an official language: English is the *de facto*, but not the *de jure* official language. In the UK, the provision of language rights to autochthonous minorities is of recent vintage, and official language planning measures are devolved to regional (Scottish, Welsh) governments through legislation such as the *Gaelic Language (Scotland) Act 2005*, and these measures are *not* the concern of government at the UK national level. To account for the provision of translation and interpreting services, including those for immigrant language groups, González Núñez (2016) shifts focus from language policy to policies to do with human rights and non-discrimination regulations (e.g. the UK *Human Rights Act* 1998 and the UK *Equality Act* 2010). In these regulations, language background is but one of many attributes alongside disability, age, gender, etc., based on which residents must not be discriminated against. The flow-on effect at the level of local government is that councils often provide translations into locally-used immigrant languages not only in a reactive sense (i.e. a local resident requests an interpreter to sight translate a document into Urdu), but for the "inclusion" of all local communities and the "accessib[ility]" of council services to them (González Núñez 2016: 9–10).[4]

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3 "Language planning" does not really exist as macro-social notion in an official or national sense in the UK. It is otherwise conceptualised as relating to the choice of *foreign* languages taught in schools (e.g. Department for Education and Skills 2007) or as a means to select and limit the number of spouse-visa-holders eligible to stay in the UK (UNAOC 2010).

4 Parallel to this are different narratives such as instructions to councils that they "should think twice before continuing with, or providing new, written translation materials – considering the impact on both those who actually use them, and also thinking through how English speakers will perceive the special provision of written materials that do not feature any English" (Department for Communities and Local Government 2007: 10); and the following directive: "Stop translating documents into foreign languages: only publish documents in English. Translation undermines community cohesion by encouraging segregation" (Department for

The provision of T&I services in the UK, an "Old World" country with a long heritage of Anglophone monolingualism, but now a host country to many millions of migrants, is interesting to observe. The UK situation shows a residual "over-arching" influence of Anglophone parochialism (e.g. "You should speak English") with an accompanying laissez-faire, but now increasingly interventionist approach to language matters, such that these condition the provision of T&I services, in particular the provision of interpreting services. Observing the greater need for interpreting services in many countries with growing migrant populations, Ozolins (2010) focuses on the provision of these services in a cross-national comparison that seeks not only to describe how different countries have similar or differing conventions, but why this is the case. In accounting for why countries have particular spectrums of response to multilingual communication needs in interpreting – from "neglect, *ad hoc* means (by friends, family, volunteers), to generic language services (e.g. a telephone interpreting service) and comprehensiveness (availability of interpreting services as a component for all public services)" (Ozolins 2000), Ozolins (2010: 195) posits that there are four macro-level factors that are present in all situations of the provision of public service interpreting. Macro-social factors are of key importance in policy formulation, and Ozolins's four factors are presented here due to their relevance to our analysis:

> The obvious reliance on government funding and budgets to provide language services in the public sector, and the changing ideologies of public sector finance that affect the nature and quality of language services;

> The increasing diversity of languages that must be catered for, preventing any easy meeting of needs and standards in a smaller range of languages, and constantly bringing new demands and practitioners into the interpreting environment;

> The institutional basis of language services, making it an institution-led field (identifying needs, looking for resources, determining responses, setting whatever standards, limiting commitment) rather than a profession-led field where a set of standards and practices have evolved and been established through a professional socialization process;

> The inevitably cross-sector needs for interpreting: non-speakers of dominant languages may have many interactions with the public service. Language policy thus entails cross-portfolio policy making, as opposed to the usual sector-specific public policy development processes. (Ozolins 2010: 196)

To these four macro-social factors, Ozolins (2010: 198) adds governmental interest and institutional complexity as key determinants of policy making as well as social attitudes and public vs. non-governmental traditions of service provision.

Communities and Local Government 2013). See Schäffner (2009) for a comprehensive discussion of popular attitudes and the provision of T&I services in the UK.

2.1 Notions of policy and models of policy formulation

Our attention now moves to the notion of what policy is, the study of policy-making and to evaluative models of policy design and implementation. The study of policy, sometimes also termed "public policy" to refer to the key role of the state or government as the main protagonist, is an established subject area in a number of disciplines: law (legislation as an outcome of policy); economics (private and public sector analysis as a basis for economic policy); occupational psychology (organizational behavior as a basis for workplace satisfaction and productivity); sociology (socio-economic demographics, distribution of wealth, need for and access to public services as a basis for social policy). As such, Policy Studies is now a recognized discipline. When we add "translation" as an attribute to policy, it may be harder to distinguish this as a distinct area as language use intersects almost universally across all areas of human contact albeit often in a non-obvious way. Translation may not be readily identifiable or "containable" in the same way as "education" or "welfare" to be the subject of policy formulation and implementation. Notwithstanding this, it is instructive to subject what we consider to be "translation policy" to an analysis of how such a policy could come about. Keeping this in mind, we seek to identify where there is provision of translation services, whether the following pertains: is the provision of translation services an example of the implementation of a recognizable translation policy, or is it a consequence of some other kind of policy?

Early research on public policy quickly came to the conclusion that policy was not an event that represented a single governmental decision, but a process that reflects interconnected decisions, and which almost invariably involved not one decision-maker but many (Dye 1972). Although it would appear to be self-evident, Anderson (1984) and Bacchi (2009) make explicit the contention that public policy underscores the connection between the perception of a problem (regardless of whether that problem is real or imagined) on the one hand, and government pronouncements on the other. What a "problem" is and how it may be significant enough to warrant discussion, either in the public domain or amongst a select few, belongs to the realm of policy formulation. Further, public policy can be conceived of as a goal-oriented activity as posited by Jenkins (1978) who, by implication, reasoned that the study of policy must include its subsequent evaluation, i.e. the study of policy should include the proposal of a policy, its implementation, then a review of the policy's content vis-à-vis its implementation. There can be lesser or greater degrees of government involvement in the formulation and carriage of policy, from a low level that leaves policy delivery to "voluntary"

instruments such as "family and community" or "private markets" to a high level in which "compulsory instruments" are employed such as "regulation", "public enterprises" and "direct provision" so that the policies are put into effect (Howlett et al. 1995). In between, there can be a "mixed level" of involvement consisting of "information and exhortation" (e.g. public announcement campaigns), "subsidies" (e.g. grants and sponsorships), and "tax and user charges" (e.g. user-pay regimes as a disincentive).

There are a number of models within Policy Studies that claim applicability to policy development across different fields. These include, amongst others, the Stages Heuristic – policy described in terms of chronologically following stages, from agenda setting to policy evaluation (Lasswell and Kaplan 1950; Nakamura 1987); the Institutional Rational Choice framework – how institutional rules alter the behavior of strategic actors pursuing self-interested goals (Ostrom 2007); the Punctuated-Equilibrium framework – policy process tends to feature long periods of incremental change punctuated by brief periods of major policy change (Baumgartner and Jones 1993); and the Advocacy Coalition Framework, which focuses on the interaction of advocacy coalitions, with policy change being a product of the competition and interaction between these coalitions (Sabatier and Jenkins-Smith 1988). The contribution that these Policy Studies models provide to our understanding of "policy" and "translation policy" is that policy formation, at least in countries with a democratic tradition, is a multi-party process with macro-social dynamics that intersect with individual events and protagonists, sometimes in a separate way, sometimes in a cumulative or collective way. The broadness of the term policy and an indiscriminate approach to elements that pertain to it is a useful heuristic.

In this article, we adopt the Multiple Streams Framework (hereafter: "MSF") developed by Kingdon (1995) whose work was influenced by Cohen et al. (1972). Kingdon's MSF seeks to describe policy-making as a complex set of interactions with multiple actors, often with competing and unpredictable objectives in a surrounding environment that may be ambiguous or diffuse. The framework centers on three streams of actors or processes: the *problem stream*, the *politics stream*, and the *policy stream*. The three streams are regarded as existing in parallel within the policy-making environment until they are "coupled", that is, joined together when propitious circumstances called *policy windows* open and when *policy entrepreneurs*, the actors who take advantage of the policy windows, place the idea on the decision-making agenda. The diagram in Figure 1 presents in visual form the different streams of the MSF model and their relationship to each other and to policy output.

The MSF and an application of it to translation policy in Australia is returned to in Section 3.1 below.
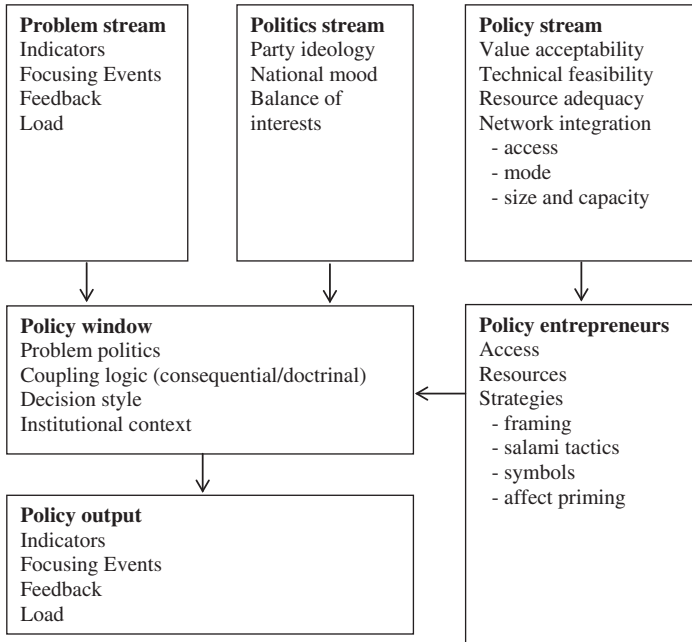

Problem stream
Indicators
Focusing Events
Feedback
Load
	Politics stream
	Party ideology
	National mood
	Balance of
	interests
		Policy stream
		Value acceptability
		Technical feasibility
		Resource adequacy
		Network integration
		  - access
		  - mode
		  - size and capacity

Policy window
Problem politics
Coupling logic (consequential/doctrinal)
Decision style
Institutional context

Policy entrepreneurs
Access
Resources
Strategies
  - framing
  - salami tactics
  - symbols
  - affect priming

Policy output
Indicators
Focusing Events
Feedback
Load

Figure 1: Multiple streams framework for policy formulation, adapted from Sabatier (2007: 10).

3 A national policy on languages and the emergence of a translation policy in Australia

The discussion in the preceding section indicates that a number of factors contribute to policy development. This section looks at policy in regard to language(s) and translation but does not present information from the pre-1770 period on likely conventions of translation between speakers of different indigenous languages before the arrival of Europeans and it does not focus on the reasons why the establishment of Australia as a federation of states in 1901 had a constitution that contained no mention of an official language. Attention is focused on the post World War II era, from the 1970s when a social-democrat (Labor Party) government came to power in 1972 that began to consider changes in the way that migrants were treated. The then minister for immigration and ethnic affairs, Al Grassby, commissioned task forces in each state to investigate the adequacy of post-arrival migrant services, but also areas beyond

immigration such as education and law (Martin 1978: 148–50). He espoused a sense of pluralism that was already the reality of Australian society, with its indigenous history, British colonizers, and post World War II large-scale European migration, labelling the different ethnic and linguistic groups "the family of the nation" (Ozolins 1993: 111).

Grave shortcomings that were identified led to the establishment of the Emergency Telephone Interpreter Service in February 1973, the first telephone interpreter service in the world. In 1975 and 1976, large grants were made by the federal government for T&I services in hospitals (Ozolins 1993: 148). The first full-time courses (at post-secondary level) in T&I commenced in 1975. In 1977, the National Accreditation Authority for Translators and Interpreters (NAATI) was formally established with responsibility for testing and accrediting candidates, approving tertiary courses in T&I, and maintaining a register of accredited practitioners. It was also tasked with the establishment of a professional association.

In the census collection of 1976 (conducted every five years in Australia) information was elicited on residents' use of languages other than English (hereafter: "LOTE").[5] In 1978, the Galbally Report, commissioned by a conservative (Liberal Party) government was released. The report's brief had been to survey post-arrival services for new migrants, including the provision of T&I services. In a number of places, the Galbally Report[6] specifically identifies T&I services: the required expenditure; the extension of Commonwealth government translating and interpreting services and additional services provided by the states and territories; the additional financial recognition to be given to bi- or multilingual Commonwealth public servants whose linguistic skills are employed (the Language Availability Performance Allowance); funding to healthcare for the employment of interpreters and bilingual health workers; the extension of the Telephone Interpreter Service to wider parts of the country; Commonwealth funding to states for their areas of responsibility that require T&I services; interpreting in the school and university sector (Galbally 1978: 2, 4, 6, 8, 11). It is important to note that these recommendations were made not due to an appreciation of Australia's linguistic diversity per se and the importance of T&I as a cultural-linguistic expression of this, but due to the desire to map out

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5 Proficiency level in English was a question added in the (1986) census with four gradings available: "I speak English very well / well / not well / not at all". The inclusion of this question was in part motivated by the desire of demographers and policy-makers to elicit in approximate terms the projected need for T&I services amongst the general LOTE-speaking population.
6 The Galbally Report was itself translated into the ten most widely spoken languages of the time and presented to the Parliament in the ten languages.

particular government steps. It was social policy that determined these steps that were intended to foster a cohesive and inclusive society. Such a society would reduce the risk of disadvantage, disengagement and alienation that policy-makers could see occurring in other countries with large immigrant populations.

Since the mid-1970s a national policy on language had been discussed, especially in relation to the decline in foreign language learning, but also in relation to indigenous languages, "migrant" languages, and the teaching of English itself. The acceptance of the Galbally Report added the provision of services in languages other than English to the list. It was not until 1987, however, that a *National Policy on Languages* (hereafter: "NPL"), written by Professor Joseph Lo Bianco was published. The NPL outlined a number of focus steps: acquisition of English, including literacy amongst LOTE-speakers; the teaching of Aboriginal languages (and also the codification of some of them as a co-requisite to this); an increase in the teaching of "community (immigrant) languages" and "languages of international or regional importance"; and language services, including T&I. The NPL emphasizes the importance of training of interpreters and translators for all languages groups – immigrant and indigenous languages as well as Auslan (Australian sign language). Policy vision comes through in this document through the call for T&I to be considered not a "stop-gap" measure for peripheral groups, but an integral part of intra-group communication, i.e. amongst all those who belong to the Australian population:

> Interpreting and translating ought to be regarded as an aspect of service provision in Australia rather than a welfarist program for the disadvantaged. To this end the continued professionalization of the field is urgently required. It is important that this extend to the development of control of entry mechanisms and registration of interpreters/translators so that professional, accredited personnel only are used. A multilingual society needs to guarantee that language does not become a barrier to access to information and services. Consequently, the profession of interpreting/translating is a necessary component in providing access and equity in relation to the provision of services paid for by the whole community, regardless of their linguistic backgrounds. (Lo Bianco 1987: 164)

To the domestic needs of Australia's population, Lo Bianco also added the international ones: the importance of trade, scientific and tourist contact between Australia and neighboring south-east and east Asian countries means that there is a commensurate need for high-level T&Is for Indonesian/Malay, Japanese and Mandarin Chinese as well.

Two things stand out: firstly, the NPL was the first language policy of its kind in any Anglophone country; secondly, as far as T&I was concerned, a large number of the policy directives were realized. What we also see here is an

example of social policy "catching up" with the demographic reality of a society. When a country's population features variety in its ethnic, linguistic and religious composition, it is incumbent on those governing the country to provide a response to this variety that allows the expression of different and diverse practices as a feature of the country's domestic life. Australia was also not isolated from events taking place elsewhere. In the post World War II era, decolonization took place across many continents, and in the 1960s the "ethnic revival" occurred in North America, part of a worldwide ethnic rights movement. At the same time, the notion of social equity taken up usually by left-wing governments as a result of the ideological upheavals that happened across the Western world in the late 1960s also contributed to this shift in re-creating Australia as a more open, tolerant and just society. Movements that followed the ethnic revival and the push for social egalitarianism, such as the recognition of indigenous population (1980s) and access and equity for those with disabilities (1980s and 1990s) also had commensurate effect on social policy in Australia, and subsequently on T&I: Australian indigenous languages and also Auslan were added to the list of languages in which NAATI now conducted testing and accreditation (see Section 4 below).

The NPL has not been superseded by another, similar document, but by the late 1990s other federal government policy documents had shifted focus so that the notion of a "language policy" and the term itself became less frequently used (Lo Bianco 2010, 2011). The principles and policy observations of the original policy document still remain as a referral source, but its reach and impact is now, some 30 years later, commensurately smaller.

3.1 The Multiple Streams Framework and its application to translation policy in Australia

This section relates back to the description of the Multiple Streams Framework (MSF) provided in Section 2 and applies this model to the development of translation policy in Australia, culminating in the NPL released in 1987. The MSF is re-visited here with an outline of its three streams which are then related to the formulation and implementation of translation policy.

The *problems stream* of the framework considers the existence and nature of an issue that requires attention. It encompasses how such issues come to the attention of policy makers, how the policy makers learn that such an issue exists and what the *indicators* are that elevate the issue so that it is noticed enough to be a *problem*. The highlighting of an issue is often brought about by a *focusing event* which could be a system-wide event such as a natural disaster, a crisis, a

powerful experience or a symbol. The effect of a focusing event is dissipated if it is not accompanied by some confirmatory *feedback* that the issue is still a live one. The total *load* of issues on the policy makers is also a contributing factor to an issue fading away or getting greater attention. Not every issue becomes a problem and some problems are not really problems but they are still introduced into the policy process because it suits some political objective for them to be regarded as such. This specific distinction between issues and problems also allows the policy makers to classify issues as characterizing one problem instead of another, i.e. to aid in "problem definition" that affects the policy response; for example, the issue of interpreters could be classified as a problem of service provision or a problem of uptake of English classes for migrants.

Looking at the characteristics that describe the problems stream, we locate the following phenomena relevant to the situation of LOTE-speakers in Australia over the last forty years and how they "fit" into the MSF model. The obvious issue in the immediate post World War II years was the lack of proficiency of the recently arrived migrants and the indicators were their inability to adequately communicate with English-speakers in a range of public, commercial and employment-related settings and the inability of English-speakers to communicate with them (Koch-Emmery 1953). There was, however, on-going and growing feedback about this issue, to state and federal governments, from key sections of public life: healthcare, police, the judiciary and education. The load of this issue continued to increase annually with further intakes of LOTE-speaking migrants. A policy of assimilationism that advocated (and predicted) rapid language shift to English was, for many if not most, unattainable. By the early 1970s, what had been an issue was by then a "pressing problem" that could not be overlooked.

Moving to the *politics stream* of the MLF model, this stream looks at (party) *ideology* which may have its own yardstick to assess policy proposals. In addition, the politics stream is influenced by the *national mood*, something brought about by such things as ("single-issue") campaigns (e.g. *Save the whale!*), pressure group lobbying (e.g. *Equal pay for women!*), administrative or legislative changes (e.g. consumer law as a catalyst for the notion of consumer rights) that, at a macro-social level, can be detected by such instruments as public opinion polls that monitor mood swings. This perception of national mood is instrumental in promoting certain items on the agenda or retarding the progress of others or altogether eliminating some from consideration. This kind of approach operates on a *balance of interests* litmus test in order to decide which issues will advance in the policy-making environment.

Related to T&I, we observe from the 1960s on aspects of the national mood common to other Western countries, namely a period of egalitarianism and liberalism to which even conservative parties were not immune. "Inward-

looking" Anglo-centric monolingualism, as but one aspect of monocultural-ism, appeared less desirable as the *sole* characteristic of a society that increas-ingly "looked outwards" and even saw itself as cosmopolitan in many ways. The equality of different ethnicities, and with these, their languages, and a general feeling of egalitarianism which now extended across not only class lines but ethnic ones captured the national mood. Australia had become, in comparative terms, an affluent country and there was the feeling that the country could also financially afford the services for all residents to partici-pate equally in public life.

The *policy stream* was likened by Kingdon (1995) to a large number of policy ideas floating in a "policy primeval soup". These ideas are generated by groups, networks, communities, researchers and others and are subjected to varying degrees of scrutiny or even trialled by means of papers, hearings and conversa-tions. Of the large number of extant policy ideas only a few receive serious consideration and those that do are selected using the criteria of *technical feasibility* and *value acceptability* in order to establish whether such ideas could actually be developed and whether they are of sufficient worth to pursue and there are *resources* to do it. The overlay of another criterion serves to further sort the ideas, this being whether the ideas are congruent with the values of the policy-makers and could be *integrated* into existing policies.

In relation to the development of a translation policy in Australia, and perhaps reflecting the pragmatic approach that is adopted in regard to many issues, the criteria of technical feasibility and value acceptability are recogniz-able in the initial measures undertaken. For example, where a service is going to be formally defined and resourced, policy-makers can look to see if there are not already protagonists providing this service, even in a partial or unrecognized way, and for service provision to be undertaken via the recognition, elevation and extending of these services. An instance of the application of this criterion relates to those public servants who employed their linguistic skills in their work with members of the public. With the implementation of a formal policy, this led to the introduction of the Language Availability Performance Allowance, as mentioned above, a supplement to these public servants' standard salary. This move performed multiple functions: existing capacity could be used; the finan-cial cost was moderate when compared to the cost of employing new staff to perform this function; the allocation of a financial reward ensures some measure of sustainability of these services.

To look at the macro-social level, the misdiagnoses, miscarriages of justice and critical misunderstandings with emergency services that were frequently reported and widely known had not only a social cost to them (not only borne by the LOTE-speaker) but a monetary one – the need to extend treatment, re-open

trials and treat needlessly injured residents is financially costly to the state (Martin 1978). Senior public servants began to calculate the projected T&I needs for the population, what these may cost, and whether the federal government could or should fund these. This aspect of policy formulation involves cost-calculating and cost-effective responses. It is important to note that these practical aspects – i.e. the planning, then implementation and delivery of a policy decision – are aspects that can themselves greatly shape the content of the policy.

As shown in Figure 1, Kingdon (1995) suggests that when the three streams meet at critical moments, they could constitute a policy window. When this window opens, the issue becomes a part of the policy agenda and commensurate policy-making steps follow.

The provision of T&I services as well as the policy of multiculturalism had in the then minister for immigration and ethnic affairs Al Grassby (1972–1975) an ardent and highly effective policy entrepreneur. Himself a trilingual, Al Grassby was a popular politician who succeeded in convincing large sections of the Australian public that egalitarianism, and harmony with and mutual tolerance for newly arrived migrants was *the* key to the country's advancement. He also sought to associate the multilingual and non-British heritage of large sections of the population as a characteristic of a nascent Australian nationalism. While Grassby was the "show man" of multiculturalism, the "hard-headed" field worker who researched the needs of Australia's non-English-speaking-background population (hereafter: "NESB") was a prominent lawyer, Frank Galbally, whose common-sense approach convinced both politicians and the general public. Figure 2 maps the main features of T&I policy formulation to the MSF.

The release of the NPL, with frequent references to the importance of T&I to social cohesion, access to public services, access to education, occupational safety, trade, tourism, and technical, academic and cultural exchange with other countries marked a formalization of practices that were either already being provided, or that could be implemented in a reasonable space of time. At the same time, the recipients of the NPL were principally public servants, pedagogues and educational policy-makers. It is hard to assess the actual "reach" of the policy to those beyond these fields. This policy document could certainly wield authority as a guideline which those in the T&I sector could invoke when they sought to establish T&I services in a range of settings in which these had not been hitherto provided. But the NPL was not as strong a catalyst for T&I as it may have appeared, and the influence of it began to lessen by the end of the 1990s. We need to also look elsewhere to see how T&I services would be subsequently introduced across a range of settings in Australia. The following section traces these developments.
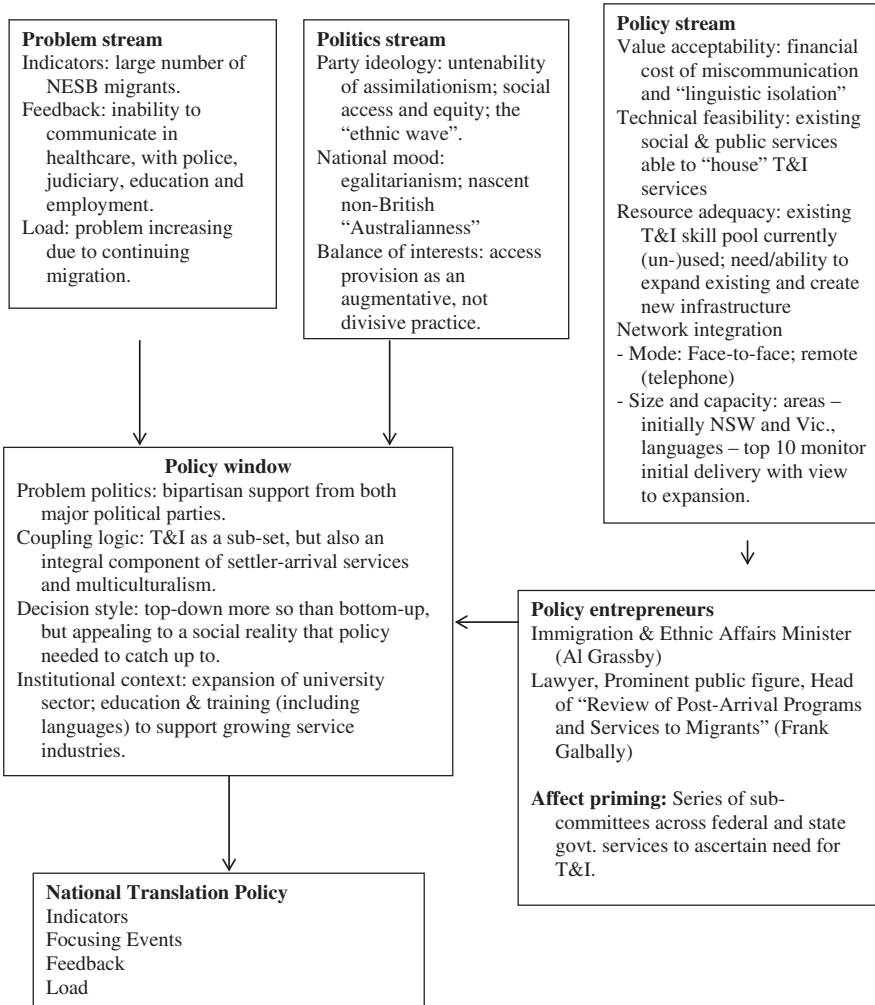
Problem stream
Indicators: large number of
    NESB migrants.
Feedback: inability to
    communicate in
    healthcare, with police,
    judiciary, education and
    employment.
Load: problem increasing
    due to continuing
    migration.

Politics stream
Party ideology: untenability
    of assimilationism; social
    access and equity; the
    "ethnic wave".
National mood:
    egalitarianism; nascent
    non-British
    "Australianness"
Balance of interests: access
    provision as an
    augmentative, not
    divisive practice.

Policy stream
Value acceptability: financial
    cost of miscommunication
    and "linguistic isolation"
Technical feasibility: existing
    social & public services
    able to "house" T&I
    services
Resource adequacy: existing
    T&I skill pool currently
    (un-)used; need/ability to
    expand existing and create
    new infrastructure
Network integration
- Mode: Face-to-face; remote
    (telephone)
- Size and capacity: areas –
    initially NSW and Vic.,
    languages – top 10 monitor
    initial delivery with view
    to expansion.

Policy window
Problem politics: bipartisan support from both
    major political parties.
Coupling logic: T&I as a sub-set, but also an
    integral component of settler-arrival services
    and multiculturalism.
Decision style: top-down more so than bottom-up,
    but appealing to a social reality that policy
    needed to catch up to.
Institutional context: expansion of university
    sector; education & training (including
    languages) to support growing service
    industries.

Policy entrepreneurs
Immigration & Ethnic Affairs Minister
    (Al Grassby)
Lawyer, Prominent public figure, Head
    of "Review of Post-Arrival Programs
    and Services to Migrants" (Frank
    Galbally)

Affect priming: Series of sub-
    committees across federal and state
    govt. services to ascertain need for
    T&I.

National Translation Policy
Indicators
Focusing Events
Feedback
Load

Figure 2: Presentation of translation policy formulation in Australia according to the Multiple Streams Framework.

4 Social and public policy in Australia and the provision of translation and interpreting services

Discussion here centers on laws, declarations or charters and the effect that they have when implemented or followed. These regulations pertain to a supra-

national (or international), national or state (or local) level that determines – or at least strongly influences – the provision of services to residents. The T&I focus here will be on interpreting services, as the demand for these is generally higher, and they are indicative of "front-line" and "personnel-intensive" service provision.

Presentation of laws, declarations or charters proceeds from international ones to national ones, then to state (provincial) or local ones. There is a hierarchical relationship that determines that declarations from "higher-order" authorities have a commensurate effect on lower ones; in the case of Australia, only laws passed by Australian legislature apply in Australia, notwithstanding Australia being a signatory to many international conventions.

A landmark document in human history is the 26-page *International Covenant on Civil and Political Rights* of 1966 (UN OHCHR n.d.) which implicitly mentions the right to an interpreter where criminal charges are laid. There are equivalent laws or charters on human rights passed at the national (or state) level in Australia that are congruent to this. For example, in the Australian state of Victoria, the *Charter of Human Rights and Responsibilities Act* (2006), section 25, paragraph (1)(h)(i) states that in criminal proceedings, the accused has the right "to have the free assistance of an interpreter if he or she cannot understand or speak English". This charter appears late in coming – in practice, the principle of the provision of an interpreter in criminal cases had been established in countries within the common law tradition in 1916 in England (*R v Lee Kun* [1916] 1 KB 337).[7] In Victoria, the importance of interpreting services of a legal nature *outside* the courtroom was recognized and included in Section 464D of the Victorian *Crimes Act* 1958 which states that:

> [...] if a person in custody does not have a knowledge of the English language that is sufficient to enable the person to understand the questioning, an investigating official must, before any questioning or investigation [...] commences, arrange for the presence of a competent interpreter and defer the questioning or investigation until the interpreter is present.

Similar acts, e.g. the Victorian *Evidence Act* (2008), regulate that interpreters be provided for witness-giving statements in court. The effects of such laws, as well as other policy guidelines, are that, in Victoria, interpreting services are provided as a basic and free service to suspects and witnesses in criminal

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7 The privileging of the court situation as the only one that the state sees fit in passing regulations is a common one: in code law countries such as Austria, Germany and Spain, the court interpreter has a recognised status in the judiciary, but the provision of interpreting services before, outside and after court proceedings is not similarly regulated.

proceedings with the following: police officers, lawyers, courtroom officials, prison staff, parole officers and Ministry of Justice employees in regard to release conditions and rehabilitation. Free interpreting services are provided on request to those requiring legal advice on family law, consumer law and some areas of civil law. These include for example, hearings at tribunals (lower-level courts) on public housing, welfare payments, salary entitlements, guardianship and power of attorney of family members etc. In fact, the service provision goes further: at initial points of contact, suspects, witnesses, plaintiffs, applicants, respondents are asked if they require an interpreter. The provision of interpreting services has resulted from a number of laws and guidelines for the functioning of legal processes (JCCD 2017). To these we can add the procedural aspect of those working in the executive, judiciary and others in the legal field: the fear that information gathered from a LOTE-speaker without the services of a professional interpreter may be erroneously expressed or be the response to incorrectly understood elicitations.

It was a mix of these regulations, and the overdue recognition of the (linguistic) rights and needs of Aboriginal Australians from the 1980s onwards that led to the establishment of interpreting services for speakers of indigenous languages: the Northern Territory Aboriginal Interpreter Service and the Kimberley Interpreting Service in Western Australia. The catalyst for this was, arguably, the heightened awareness of indigenous issues (see "national mood" in the MSF *politics stream*) and a now pre-existing T&I infrastructure (see "technical feasibility" in the MSF *policy stream*) rather than T&I services for indigenous languages per se. In some, mostly remote areas of Australia, the inability to communicate adequately with many indigenous Australians was indeed a problem about which feedback had accumulated and which represented a "load" in the MSF *problem stream*, but perhaps for these areas only, and not at a national level.

The existing T&I infrastructure had been set up with immigrants in mind. But that policy did not specifically distinguish which LOTEs would attract T&I services; instead, *all* LOTEs were to be serviced. With the raised social and political awareness of the existence and needs of indigenous languages, there was no logical reason to exclude these languages from the T&I services extended to other languages. In this way, the provision of T&I services for indigenous languages could reasonably easily "fit" into a policy, funding and regulatory framework that had already been established. The first Australian Aboriginal languages were accepted for testing and accreditation by NAATI in 1983. These kinds of occurrences show that service provision can often proceed in unforeseen ways where past battles fought can benefit others in an unanticipated way. The same can be said in relation to disability, and the passing of anti-

discrimination laws on the basis of disability from the 1980s onwards that accompanied the establishment of T&I training and accrediting in Auslan in 1982.[8] Policy entrepreneurs, within the public service and amongst community groups, were able to lobby policy-makers at critical points to achieve these goals. They didn't so much make demands, but pointed out the untenability of awarding services to some groups and not to others, e.g. "How can we reasonably exclude indigenous languages and Auslan from T&I services when we provide these for others?".

While the provision of interpreting services in police, legal and court interactions is now well established, the single biggest field for which interpreting services are provided in Australia is the healthcare sector (Dragoje and Ellam 2007). When a patient is admitted to a public hospital in most urban areas, the need for an interpreter is one of the preliminary pieces of information elicited at the first point of contact. The comprehensive provision of interpreting services (often with written translated material in most higher-demand languages) in Australian urban hospitals is a consequence not so much of laws passed by national or state parliaments, but by charters issued by state-level Departments of Health. For example, the national *Australian Charter of Healthcare Rights* (2008) states that patients have "a right to be informed about services, treatment, options and costs in a clear and open way", with an even clearer message issued in the second person: "You can use interpreters if English is not your first language. Interpreter services are free and can be provided in person or by phone" (Australian Commission on Safety and Quality in Healthcare, n.d.: 2). The *Australian Charter of Healthcare Rights in Victoria* (Australian Commission on Safety and Quality in Healthcare, n.d.: 9, 12. original punctuation) is even clearer in defining patients' rights: "You have a right to an accredited interpreter if you need one when using a publicly-funded healthcare service, such as a hospital or community health center" and "Interpreters should be provided at important points during your care, such as when discussing medical history, treatments, test results, diagnoses, during admission and assessment and when you are required to give informed consent".

This kind of specification of interaction type for which an interpreter "should be provided" gives not only patients but also healthcare providers a clear direction on when an interpreter needs to be present. The wide range of

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8 Federal anti-discrimination legislation on the basis of race, the *Racial Discrimination Act*, was passed in 1975, while the federal *Disability Discrimination Act* was passed in 1992. The acceptance of Auslan by NAATI as a language in which T&I testing would be conducted occurred only after much lobbying from Deaf and other activist groups, but NAATI's actions were in fact ahead of the federal government.

interactions listed means that, in effect, an interpreter is requested for *all* interactions where a patient otherwise receives medical advice or treatment. Garrett (2009) provides a comprehensive description of interpreting services in hospitals, tracing the relationship between health, welfare and immigration policies and the provision of services. She contends that "Interpreter Policy" is nested within multicultural and mainstream healthcare policy and proposes a "Model of Interpreting Policy in Healthcare" to show how the provision of interpreting services is shaped partly by overt guidelines that *prescribe* them, and partly by a host of other factors that point to the *need* for them in order for other goals to be achieved (Garrett, 2009: 45; see Ozolins, 2010; concept of "cross-portfolio" provision).

Within the field of mental health, legislation in Australian states requires the provision of interpreter services. For example, the Victorian *Mental Health Act* (1986) (Part 2, Section 5B, Section 18[3]) requires this at the point of admission, and at other points where permission for treatment is requested, the "legal rights and relevant provisions [...] are explained to patients and other people with a mental disorder in the language [...] which they are most likely to understand". Further, the act specifies that at the point of admission, "the statement [prescribed printed admission statement] may be printed in different languages", and "in addition to the statement, the patient must be given an oral explanation of the information contained in the statement [...] in the language [...] which he or she is most likely to understand". The wording of this law relates to the perceptionary or cognitive capability of mental health patients. This wording is widely understood and applied to the situation of patients with limited proficiency in English in a way that interpreters are requested for such interactions.

This section has discussed the effects of government-sanctioned laws and public funding of a range of services chiefly in the health and legal sectors for T&I services. The following section presents quantitative data that offer a closer picture of where and to what extent these are provided.

5 The provision of interpreting services in Australia: national and cross-sector data, and data from a healthcare provider

This section presents data "from the coalface". The intention here is for us to look at statistics on the number of requests for interpreting services (face-to-face, or remotely via telephone or video-link), the ability for T&I service providers to meet these requests, and the distribution of requests across public and private

sectors. Section 5.1 below presents data from ONCALL Language Services, the single-largest private T&I agency in Australia, and a supplier of interpreting services to both public and private organizations. Section 5.2 presents data from Northern Health, the major public healthcare service in Melbourne's northern suburbs that services a catchment area of approximately 750,000 residents. Here statistics are provided that show the number of interpreting requests.

5.1 Cross-sector data on interpreting services from a national T&I agency

This section offers a snapshot view of numerical statistics of interpreting services across Australia. The previous sections have described how an official language policy with the provision of T&I services outlined within it was formulated and how other areas of general public policy have led to regulations that require or strongly support the provision of interpreting services in a variety of settings. The situation in Australia is therefore, as Ozolins (2010: 196) reminds us, one in which there is an "institutional basis of language services, making it an institution-led field (identifying needs, looking for resources, determining responses, setting whatever standards ...) rather than a profession-led field where a set of standards and practices have evolved". This distinguishes Australia from other, mainly European countries in which diplomatic and conference interpreting were the primary fields in which interpreting pedagogy and practice were first developed, with the addition of *public service interpreting* being a development that has occurred only since the late 1990s or early 2000s. In Australia, the institutional basis of interpreting services, across a broad range of services for all members of the Australian community, gave rise to a term synonymous to *public service interpreting*, namely *community interpreting* (Bell 1997; Hale 2007). The data provided here relate almost exclusively to public service interpreting. The statistics in Table 1 relate to the calendar year 2015.

Table 1 shows all service requests, including face-to-face and remote requests. The total number of requests that ONCALL Language Services received for the year 2015 was 410,017. ONCALL provides a significant share of interpreting services in Australia – with variation across states – but on the basis of the number of service requests shown here, and with the addition of the share of other T&I agencies (both private and public) in Australia, together with the services provided by in-house interpreters (mainly in hospitals), we estimate that the number of service requests for interpreting services for 2015 was approximately 3.5 million (Australia has a population of 24.5 million). As Table 1 shows, the healthcare sector is the single largest service area, accounting

Table 1: Statistics for service requests for 2015 (ONCALL Language Services 2016).

Field of service request	Interpreting request delivered	Cancelled by client	Inability to service	Total requests
Consultancy/Corporate/ Finance/Research	105	5	0	110
Court/Legal/Police	17,687	3,073	1,052	21,812
Education	1,344	37	30	1,411
Employment	1,967	184	32	2,183
Government	7,973	595	200	8,768
Healthcare	162,391	17,040	16,650	196,081
Immigration	574	43	22	639
Industry/NGOs	40	6	1	47
Insurance	5,142	328	108	5,578
Welfare	147,117	15,150	11,121	173,388
Total	**344,340**	**36,461**	**29,216**	**410,017**
Percentage	**84 %**	**9 %**	**7 %**	**100 %**

for almost half of all service requests. The second largest is welfare, which to a great degree also encompasses occasions of service with healthcare and social work services. Court/legal/police interpreting is the third-largest area, but much smaller than the first two areas. The other areas are "government", i.e. interpreting services for government departments themselves, insurance (customer service), employment (services for HR departments), and education (parent-teacher meetings, university-level delegations).

Service requests are overwhelmingly – 98 % – from publicly-funded organizations, i.e. the government directly or indirectly purchases these services. Remembering that service requests are made for all languages – "immigrant", indigenous and Auslan – and that T&I agencies are obliged by their contractual relationships with interpreting service purchasers to provide a comprehensive level of service, it is instructive to locate the extent to which services are delivered and where they are not delivered. A larger proportion of non-delivered services is due to cancellation by the client before the occasion of service itself where the services of an interpreter had otherwise been secured. A lesser proportion, 7 % of all requested services, could not be delivered due to the inability to provide an interpreter for the requested language at the requested time and date. We can view these statistics as an aspect of the *implementation* of translation policy – how the needs for interpreting services are met by providers, and how comprehensively these are met. ONCALL is able to provide service delivery to the levels shown in Table 1 above, in approximately 200 languages and dialects across a country as large as Australia. In general, demand for

interpreting services is growing, particularly for telephone interpreting services, as is the number of practicing interpreters. Data from another major service provider also indicates this (VITS 2015).

The data from Table 1 indicate the infrastructure in place to provide interpreting services: interpreting services as an integral component of service delivery across a range of public (and some private) services; purchasing and booking systems to secure interpreting services; language service providers as organizations or intermediaries (private or public) in matching required services with available human resources; availability of suitably skilled interpreters across a wide range of languages (Hlavac 2016). There are attendant processes that monitor the performance and efficiency of delivery as an internal organizational feature. For example, the Department of Social Services (2016) has its own *Multicultural Access and Equity Policy* with an instrument, the *Multicultural Access and Equity Assessment Tool* that "allows Australian Government departments and agencies to measure their[...] actions against best practice [...]". Another example of evaluative tools used by the same department is the *Assessing Interpreting and Translating Services Form* (Department of Social Services 2016).

There is also research, usually publicly-funded, into the need, availability and use of interpreting services that engages with a range of stakeholders: LOTE-speakers, ethnic community groups; occupation-specific associations; sector-specific organizations; demographers; public-sector agencies; T&I agencies. Recent examples of these include Foundation House (2012, 2013), while there are other examples of research that include T&I services as a standard component of service provision for public services, e.g. ECCV (2012), OMAC (2014), FECCA (2015), JCCD (2016).

5.2 Data on the provision of interpreting services from a healthcare provider

The focus now switches to a public healthcare facility, Northern Health. Northern Health services approximately 750,000 people in the northern suburbs of Melbourne (population 4.2 million). As shown above in Section 5.1, healthcare is the single largest area for interpreting services. Northern Health is an amalgamation of singly-functioning older hospitals and newer health facilities that has undertaken a strengthening of its interpreting services over the last 10 years as part of its overall approach to the needs of its patients in a culturally and linguistically diverse area of Melbourne. Over the last 10 years, Transcultural & Language Services (hereafter: TALS) at Northern Health has drawn on and

invoked regulations from a variety of public policy areas: social cohesion – *Growing Victoria Together to 2010 and beyond* (Department of Premier and Cabinet, State Government of Victoria 2005), *A Fairer Victoria. Progress and Next Steps* (State Government of Victoria 2006), *The Charter of Human Rights and Responsibilities Act* (2006); multiculturalism – Multicultural Victoria Act (2004), *Victorian Education for Global and Multicultural Citizenship* (2009–2013) (Department of Education and Early Childhood Development 2009), *All of Us, Victoria's Multicultural Policy* (2010); anti-discrimination legislation – *Human Rights and Equal Opportunity Act* (1986), *Racial and Religious Tolerance Act* (2001); healthcare – Victorian *Health Services Act* (1988), *Victorian Department of Health's Cultural Responsiveness Framework* (Department of Health, Victorian Government 2009). Invoking these laws, regulations and guidelines, TALS developed and implemented its own *Cultural Responsiveness Plans* (Northern Health 2012) which set out procedures for itself and for *all* departments of Northern Health on relation to culturally and linguistically diverse (hereafter: "CALD") patients. TALS's work also extends to Professional Development for *all* staff on the topic of working with CALD patients. This is an example of the attendant procedures referred to above.

TALS is now (2018) an entity that employs 41 in-house interpreters (equivalent of 31 full-time staff load). Language needs not covered by in-house interpreters are met by external, contracted interpreters. In 2014–2015 TALS provided interpreting services in over 80 languages. Table 2 sets out comparative statistics from a period (2007) before it began to engage closely with health policy regulations and regulations from other policy areas in regard to the provision of T&I services. These are contrasted with statistics that were collected eight years later from the period 1 July 2014 – 30 June 2015 by which time TALS had augmented its level of service provision for patients' communicative needs.

Table 2 shows comparative figures from two years, 2007 and 2014/2015. An increase in staffing has been achieved partly through a strong invocation of the regulations that oblige the healthcare provider to provide interpreters for a large

Table 2: Service provision data for transcultural and language services, Northern Health, for the years 2007 and 2014/2015.

	2007	2014/2015
Number of in-house interpreters	5	35
Number of service requests for an interpreter	17,000	52, 321
Number of service requests that were not delivered	n/a	1,802
% occasions of service that were interpreter-mediated	7 %	18.6 %

range of patient-healthcare provider interactions (see the content of the *Australian Charter of Healthcare Rights in Victoria* outlined above in Section 4), with the argument that in-house interpreters are the most efficient and cheapest means to service large language groups. The increase has also been achieved through statistical tracking of the number of interpreted interactions (occasions of service) and the average length of stay (number of days spent in hospital) of CALD patients. A positive correlation between the two, with commensurate overall financial savings due to the lower cost of an interpreter compared to the costs incurred by longer length of stay in hospital, is partly responsible for the increase in interpreting services (Lindholm et al. 2012). The number of service requests for an interpreter in 2015 was 52,321. Of these, 1,802 (3.44 %) could not be met, meaning that 96.66 % were provided. This is a high percentage and the attainment of this high percentage needs to be seen in light of the fact that the regulative mechanisms are directed at *all* residents (in this case, patients), not only those who belong to particular (usually large) language groups. This means that interpreters for languages such as Finnish, Hakka, Nepali and Samoan need to be provided (often via telephone) in the same way that they are for larger languages. Further, as mentioned above in Section 4, the wording of rights (see *Australian Charter of Healthcare Rights in Victoria*) that apply to patients, "You have a right to an **accredited interpreter** [...]", "Interpreters should be provided" (Australian Commission on Safety and Quality in Healthcare, n.d.: 9, 12, Original emphasis) leave little room for doubt as to what is incumbent on the language services provider.

Table 2 also shows an increase in the percentage of occasions of service that had interpreted services provided from 7 % to 18.6 %. This brings us to the question, at what point does a healthcare provider know that it is comprehensively addressing the linguistic needs of *all* of its patients? In the period 1 July 2014 to 30 June 2015, Northern Health had approximately 71,000 different patients. Just over half – approximately 38,000 – were born in non-Anglophone countries. Data from the 2011 census tell us that 49 % of long-standing migrants speak a LOTE at home, while amongst more recent arrivals the percentage is 67 % (ABS 2012). Most (83.5 %) claim to speak English "very well" or "well", while 16.5 % claim that they speak it "not well" or "not at all" (Profile.id. 2013a). Further, data from the main municipality that is serviced by Northern Health, the City of Whittlesea, shows that 47 % speak a language other than English, with 18.5 % in the "not well"/"not at all" group for English (Profile.id. 2013b). Realistically, those who require an interpreter are likely to include a number greater than those who nominate that they speak English "not well" or "not at all" and will include some of those who state that they speak it "well". It is likely that the percentage of those who are likely to need an

interpreter in the catchment area of Northern Health is somewhere between 20 % and 25 %. TALS currently reaches and services 18.6 % of all patients with interpreting services. The delivery of T&I services, as operationalized by TALS, is close to being "comprehensive" for those for whom such T&I services are requested or required. TALS also has guidelines for staff members with proficiency in LOTE, that pertain to their levels of linguistic proficiency and ability to interpret, protocols on when to still request an interpreter, and details on remunerating those who use their language skills. These kinds of documents are "how-to" texts that set out the actual operationalization of T&I services, i.e. they describe CALD patients' profiles, TALS staff duties, non-TALS staff protocols for contact with CALD patients, and brings these together to specify how inter-lingual transfer, transcultural expertise and the provision of patient care are operationalized. It is a document that is very much a response to the top-down directives made from a variety of policy areas. It is also an "at the coal-face" document in that it specifies the logistic procedures that a policy can state in only a general directional sense.

Guidelines such as these represent a "closing of the circle" in the exercise that we have set ourselves of "looking sideways" across other fields and portfolios to account for the provision of T&I services: in looking beyond the perhaps limited reach of a national language policy and in tracing the content of other areas of public policy, we arrive at "local-level" policy documents or guidelines that specify (and often achieve) the provision of T&I services in a comprehensive way. If a national policy on translation existed that specified the provision of T&I services in such an overt way, it would probably be considered a success if it delivered outcomes similar to this. We return to this point in Section 6 below.

6 Conclusion

This article has looked at the provision of T&I services and whether their provision is a consequence of policies that bear the title *translation* as top-down regulations that prescribe translation in areas of the public domain, or of policies that focus on other areas of public life but which contain T&I as an attribute that enables their implementation.

The starting point in addressing this is post World War II migration and the untenability of assimilationism as the then undeclared national policy, as well as the realization that, amongst other things, migrants' acquisition of English did not always occur within a timeframe or to a level that the assimilationist model foresaw. T&I infrastructure in the 1960s was small-scale and represented an initial attempt to ameliorate "the most pressing" areas of need for inter-

lingual transfer: translation of migrants' qualifications; interpreting services in some bigger hospitals; a telephone interpreter service for emergency situations. There may have been little augmentation to these services had national policy not changed in the 1970s with the adoption of multiculturalism: adoption of multiculturalism facilitated the establishment of extensive T&I infrastructure. T&I have arguably become the most prominent aspect of culturally-inclusive practices in the public sphere. It is no coincidence that one of the first targets of attack amongst opponents of multiculturalism are T&I services.

Applying a Policy Studies model to policy formulation, the *Multiple Streams Framework*, we show how activities, protagonists and conditions coalesced to bring about a national policy, multiculturalism, that after its adoption then became a macro-level policy that found representation in policy formulation for most government-funded services. Its role as a macro-level policy meant that it had influence on the stated intentions and objectives of social and public policy in various areas within policy documents themselves, usually through formulations such as "access and equity" and "inclusiveness", and more recently "diversity" and "social cohesion". The more measurable effect that multiculturalism has had in facilitating the provision of T&I for Australian residents has been through the *operationalization* of services to realize the above-mentioned objectives of "access and equity", "inclusiveness" and so on. We have shown how in policy documents and legislation relating to health, mental health, police and the judiciary as well as in other areas, T&I services have become an integral part of general service provision. Data presented in this article also show that the ability to provide requested or required T&I services is high – the percentage of service requests to a major T&I provider that could not be served is only 7 %. There is an established T&I infrastructure that allows policy delivery (see the *Multiple Streams Framework*'s identification of "resource adequacy" and "network integration"). On a related level, anti-discrimination legislation has led to communication barriers experienced by speakers of Australian indigenous languages and hearing-impaired residents being addressed through the provision of services that, in an organizational sense, had been established for others, namely migrants. Policy can be shaped and certainly its operationalization can be greatly advanced by the presence of existing equivalent services (see the *Multiple Streams Framework*'s notion of "technical feasibility") that can then be extended or replicated.

A document that by its name and its contents attracts the attention of T&I policy researchers is the *National Policy on Languages* released in 1987 which places T&I within "language services". Here the NPL advocates professionalization of the industry through standard setting, testing and training, and sees T&I services as a general and not remarkable or welfarist aspect of service provision.

Both the intra-social and inter-social role of T&I is mentioned, with a view to Australia's trade, scientific and tourist contacts. These recommendations are directives that one would expect from a progressive translation policy document in an affluent New World country. The NPL was a vanguard document in many ways, and it could be and was sometimes invoked as an influential document to effect T&I service provision. But its "reach" and its "authority" as a document that was able to effect the implementation of T&I services was limited to a period until the mid-1990s. After this period, it has been other areas of social and public policy that have accounted for the implementation of T&I services. This is evidence for our contention that one needs to "look sideways" to account for T&I services where an overt language policy that includes T&I is either absent or has fallen into disuse.

The "looking sideways" approach allows us to re-evaluate the conceptual relationship between language policy and translation policy. Meylaerts (2011a: 744) states that "[...] there is no *language* policy without a *translation* policy"; the former necessarily includes the latter. But can translation policy exist without language policy? This is the situation that appears to exist in Australia: the 30-year old NPL now has not even a subsiding effect and there is no macro-level feature such as an official language. National and cultural values are not indexed via language designations, at least not in a formalized way or in a legal sense. The linguistic profile of residents is a *social* attribute of the Australian populace alongside others such as physical ability, age, gender, socio-economic status which feature in policy planning and policy implementation stages. The inclusion of residents' linguistic profile at the planning stage (with the provision of T&I services as a consequence of this at the implementation stage) has become a "built-in" feature of many, if not most, areas of social and public policy.

At a macro-level, institutional monolingualism prevails, and T&I into and from other languages does not challenge the socio-political dominance of English. Nominally, there is an "absence of streamlined language and translation policies", but at the same time, T&I services are much more than "a granted exception" (Meylaerts 2011a: 751). We conceptualize translation policy here as referring to the practice of other policies that need not see translation as a goal in itself, but which facilitate its provision as means for the achievement of any other policy goals. To this we add that there needs to be a general popular view that does not prohibit or oppose T&I and social policies that are open to it. *Multiculturalism* as an over-arching macro-policy foregrounds inclusion, access, and equity, with recognition and acceptance of cultural and linguistic diversity as a vehicle to achieve this. This is a "looking sideways" approach with a top-down and then a bottom-up view of translation policy. In our case, it shares few connections with language policy in Australia, which itself, in practice, has returned to being laissez-faire and remained mostly monolingualist.

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