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Ms Ajabulile Mtiya
Committee Secretary
Portfolio Committee on Arts and Culture
3rd Floor
90 Plein Street
Cape Town

Dear Ms Mtiya

JOINT SUBMISSION ON THE SOUTH AFRICAN LANGUAGE PRACTITIONERS' COUNCIL BILL (B14-2013) MADE TO THE PORTFOLIO COMMITTEE ON ARTS AND CULTURE BY THE SOUTH AFRICAN TRANSLATORS' INSTITUTE AND THE PROFESSIONAL EDITORS' GROUP

Dear Ms Mtiya

Thank you for the opportunity to make a brief personal submission to this Portfolio Committee.

I write as a language practitioner with many years' experience (mainly as an English text/language editor) since 1976. I am a member of both the above bodies.

I am also Associate Professor in, and was 2012 Acting Chair of, the Department of English Studies at Unisa, by far the largest such department in the country. I am therefore fully cognisant of the issues surrounding language practice of all kinds in South Africa.

I agree fully that the profession of language practitioner (I would prefer the term language professional) should be regulated and the Bill is certainly a step in the right direction.

In my view, though, various aspects need rethinking.

I shall mention just a few:

1. The **Council's composition** should be much wider than government officials and include representatives from the major sizeable, well-established and professional bodies mentioned, as well as other stakeholders.



2. **Consultation regarding its composition should also be broader**, with these bodies and also with academia. Apart from offering qualifications in languages, most universities have language services sections which provide translation and language editing services, for instance.
3. I believe strongly that the Council should **elect its own chairperson and deputy chairperson**.
4. **Terminology, objectives and functions** should be tightened up and made more consistent. For instance, there are various kinds, levels and responsibilities of the language profession, e.g., translation, sworn translation, interpreting, text editing, proofreading, etcetera.
5. **Accreditation** (perhaps certification would be a better word) and **registration** deserve much more precise thought as these are complex processes operating at different levels, yet are actually the core business of the proposed Council.
6. As it stands, the Bill is not clear on **training and levels of qualifications**, and certain of the functions of the proposed Board would seem to overlap with those already carried out by the HEQC and embodied in the HEQF (the Bill is not correct in referring to SAQA and ETQAs at tertiary level).
7. The **necessity of experience and or apprenticeship/internship** is not considered. Yet this is essential in other professions, e.g. the legal, medical and accounting ones. A mere academic qualification by itself proves nothing.
8. In line with other professional bodies such as the HPCSA, I strongly recommend a system of **CPD (continuing professional development)** once accreditation and or registration are achieved.
9. The Bill should specify **whether anyone who is not accredited and or registered may advertise or work as a language professional**, and if not, how this would be prevented.
10. What role would the Council play in **the resolution of disputes** between language professionals and clients?
11. Some thought should be given to the question of how **fees** for various levels of the language profession are to be arrived at.
12. The **transitional period of two years** seems very short to me. In this regard I recommend a longer sunset period (for those professionals who have been active and who have much experience but are not yet accredited).

Sincerely



**David Levey (Prof.)
PhD (English Studies)**