Guidelines for Higher Education Providers on Effective Practice in Examining and Assessing in Welsh within Wales

September 2019
Introduction

The purpose of this guide is to promote effective practical arrangements for Higher Education providers that deliver and/or assess academic programmes through the medium of Welsh within Wales to reflect the expectations of the UK Quality Code for Higher Education (Quality Code).\(^1\) Degree-awarding bodies assure themselves of the equivalence of the standards of their awards when conducting assessment in Welsh.

This guide outlines the general and specific principles and practices, which apply whenever delivery and/or assessment takes place through the medium of Welsh within Wales.

The guidelines apply to modules and programmes (i) delivered and assessed through the medium of Welsh, (ii) delivered through the medium of English and assessed through the medium of Welsh or (ii) delivered through the medium of English but where elements are assessed through the medium of Welsh.

Within Wales, whatever the language of delivery, there is nevertheless a legal requirement allowing students to be assessed in Welsh.

Higher education providers in Wales are required to adhere to the Welsh Language Standards as determined by the Welsh Language Commissioner in No 6 Regulations - The Education Sector.

The Coleg Cymraeg Cenedlaethol, which works with higher education providers and other partners to develop and increase provision through the medium of Welsh, has an all-Wales network of branches at individual institutions. The Coleg may be able to advise on individuals, including its associate lecturers, who can assist in relation to practices in Welsh medium delivery and assessment.

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\(^1\) The UK Quality Code for Higher Education sets out the Expectations that all UK higher education providers are required to meet: [www.qaa.ac.uk/quality-code](http://www.qaa.ac.uk/quality-code)
The Guidelines on Effective Practice in Examining and Assessing in Welsh within Wales

Status: These guidelines are advisory only and do not form part of the Quality Code

Underlying premises

1. These guidelines start from the premise that there is a degree of risk attached to making reliable and valid judgements about student achievement where there is any intervention between the assessor and the work produced by the student for assessment. Best practice in assessment, therefore, should seek to eliminate or, so far as possible, minimise any such intervention. In terms of assuring standards, fairness and consistency are important principles.

2. In the event that the individuals delivering and assessing the provision can do so both through the medium of English and through the medium of Welsh, no intervention is required. These guidelines are intended to cover instances where this is not the case, when the individuals delivering the provision are unable to do so through the medium of Welsh and/or the individuals assessing the provision, internally or externally, are unable to do so through the medium of Welsh.

3. Effective assessment comprises safeguarding standards, giving equal opportunities to every student to demonstrate their achievement of the learning outcomes whether they submit an assessment in Welsh or English. The most effective means for securing reliable and valid judgements of student achievement is for work to be assessed without involving any translation.

4. While institutions are legally bound to offer assessment in Welsh when requested, these guidelines nevertheless apply whether or not there is a formal commitment to offer assessment in Welsh to one or more students as specified in a validation document or in a Memorandum of Agreement.

5. Throughout this document any reference to 'bilingual' refers to delivery and/or assessment through the medium of English and Welsh.

Language of delivery and assessment

6. Where delivery and assessment is offered in Welsh within Wales, it is expected that both delivery and assessment will normally be in either Welsh or in English, unless exceptionally permitted by the senior academic body for a particular programme or where the study of another language contributes to the content of an academic programme.

7. When students exercise their choice to submit work for assessment in Welsh, the arrangements for assessment, including the need for translation where appropriate, must be made clear to the student(s) concerned by the provider.

8. The most effective means for securing reliable and valid judgements of student achievement is for both internal and external examining to take place without involving any translation of the student's work. Normally the language of delivery and the language of assessment will be the same. Where programmes include an extended essay, dissertation or project module, the written and oral components must be assessed in either Welsh or English.
So, for example internal and external examiners would help to set the assessments in English and Welsh, and mark together assignments submitted in both Welsh and English. In Wales, provision through the medium of Welsh is continuing to develop and every opportunity must be taken to empower students to seek to be assessed through the medium of Welsh, irrespective of the language of delivery and for staff to develop their skills in delivery and assessment through the medium of Welsh.

Students who have followed a module through the medium of English and wish to be assessed through the medium of Welsh should inform the institution at the earliest possible opportunity, normally at the start of the module or within a specified timescale. Failure to do so may result in delays for the student due to the time required to translate materials. In the event that undertaking the assessment task requires input from others (for example, group work or a task associated with a placement), it may not prove possible to enable the student to undertake the assessment through the medium of Welsh without modifying the assessment task in some way. The institution will need to ensure that the student fully understands the implications of any such modifications. The institution will also need to ensure that any modifications are approved by the appropriate authority and that they do not compromise the fairness of the assessment process for any of the students undertaking the module.

Good practice in examining

The good practice in internal and external examining described below removes the need for translation and minimises the risk of advantage or disadvantage to the student.

Assessment in Welsh should be undertaken by internal and external examiners who are linguistically and academically competent to make judgements on the original text in Welsh.

Internal examining

It is good practice when providers are able to appoint bilingually-competent internal examiners from within the department/school that delivers the students' programme, to grade assessments submitted in both languages for comparative purposes. Providers may wish to consider including within regulations regarding the appointment of internal examiners how they might determine the bilingual competency of internal examiners for this purpose.

When a provider is unable to secure an appropriate bilingual examiner from within the department/school, providers may wish to consider appointing an associate internal examiner (for example a bilingual examiner in an appropriate specialism/discipline), from elsewhere either within the institution or from an external source. As an associate internal examiner, this person should work with the assessment team. Providers may wish to consider how examination regulations can assure the quality of such arrangements.

The associate internal examiner must be familiar with the relevant marking criteria and should look at a range of scripts marked in English to ensure consistency in marking and confer with the internal examiner before confirming marks for scripts written in Welsh. The associate internal examiner should work closely with the designated internal examiner in considering examination scripts and assignments in both languages. That is the two examiners engage in a process of moderating the assessment at the start and during the assessment process.
External examining

16 The risk to external examining is minimised by appointing bilingually-competent external examiners who meet the generic criteria that providers apply to all external examiners' appointments.

17 In Wales, the appointment of internal and external examiners who are linguistically and academically competent to make judgements on the original Welsh language text should be regarded as a first principle.

18 Providers, collectively, may wish to consider establishing a database of such bilingually-competent subject specialists to assist individual providers in the appointment of appropriate external examiners.

19 When a provider is unable to appoint a bilingually-competent external examiner who meets the normal criteria, providers should consider appointing an associate external examiner, with the appropriate subject expertise, who is bilingually competent. The associate external examiner should work closely with the designated external examiner in considering examination scripts and assignments in both languages, and in meeting other external examiner duties, including commenting on the quality of learning resources and the learner experience.

20 The responsibilities of the external examiner comprise safeguarding academic standards, being aware of the requirements of the Quality Code, moderation, familiarity with and wide knowledge/experience of the subject, sharing good practice, familiarity with the language of delivery. In certain circumstances, these tasks could be shared between the external examiner and the associate external examiner according to their respective skills and experience.

Alternative arrangements - the use of translation

21 Where it is not feasible to employ an associate external examiner, the option of translating must be considered. Offering an academic translation service constitutes a significant intervention, and, therefore, carries a higher risk. Translation may unintentionally fail to convey, for example, technicalities and nuances of meaning; it may also unintentionally enhance performance through inferring meanings not actually present within the original.

22 The risk associated with translation is present within both internal and external examining processes and may be to the advantage or to the disadvantage of the student. Providers offering such a service should ensure that arrangements are in place to minimise the risk and to safeguard the reliability of the assessment process.

23 Assessed work to be translated must be submitted through a formal process within the institution. Translators must be instructed to translate without changing the meaning of the argument that is being presented or improving the clarity of expression. Care must be taken to minimise any additional feedback turnaround time. The internal examiner should then mark the translated work and be able to confer with the translator where the presentation and/or meaning may appear unclear due to the nature of the translation. Students must be given the right to see the translated work and be asked to confirm that the translation appropriately reflects the original work which was submitted but is not allowed to make any changes to the text other than any inaccuracies in translation.

24 Institutions must have in place policy mechanisms and arrangements to minimise the effect of any inaccuracies in translation for example the use of independent translation services and by increasing the proportion of work that has to be translated where any such
inaccuracies are identified and/or systematically arranging independent back translation for a sample of student work.

25 Where translation is used, providers should ensure that its arrangements for minimising the associated risk: do not compromise the opportunities for students to be assessed in the language of their own choosing and provide opportunities for students to demonstrate they have met the learning outcomes, and to get feedback that enables them to develop their potential.

26 In pursuit of these aims providers may also wish to consider the extent to which different levels of risk attached to different modes/styles of assessment and to different discipline areas (for example, assessment involving groupwork where not all members of the group are being assessed in Welsh or where it is not possible to find a suitable Welsh language context for a placement); also on the risks implicit in the translation of assessments, and counsel students accordingly, while recognising that ultimately the language of assessment has to be the student's informed decision (see also paragraph 30).

Quality assurance of assessment through translation

27 Reliance on translation alone, both for the purposes of setting assessments, and for grading completed assignments, carries a high risk and providers doing so will need to consider means of minimising this.

Planning

28 To assure the quality of all translated materials, there is a need to identify, at an early stage both in each academic year and ideally at an early enough stage in a student's academic career, the demand for assessment in Welsh where it is required or offered and to ensure that examination arrangements are effectively organised to meet these demands. In particular providers should set and publish clear timetables for students and staff to facilitate sound and timely translations of all relevant materials.

Ensuring comparability

29 Providers must ensure comparable standards when assessments are set in Welsh and translated into English or vice versa. The translation should ensure equitability and that it does not advantage or disadvantage any students.

30 Providers must ensure that their academic regulations and operational frameworks facilitate the right of a student to be assessed through the medium of Welsh in accordance with the expectations of Welsh language legislation.

Subject sensitivity

31 Providers should note the different risks attached to the different styles and modes of assessment relating to different subjects/disciplines. Ideally, translators will need to be 'subject sensitive' and providers may wish to consider pooling their experience and expertise in order to use translators who might specialise in broad discipline areas. Subject sensitive translators could also ensure that the nuances of language codes associated with particular disciplines can be addressed in the translation process. When it is not possible to use subject sensitive translators, providers may consider commissioning a second translation for comparative purposes.
Assessment criteria

32 Assessment should be against explicit criteria communicated to students. Providers should ensure that the translation of assessment requirements and assessment criteria are accurate to ensure that submissions and the assessment of them are fully comparable with those for students who submit assignments in English.

Verification

33 Translated examination papers/assignments will need to be verified. Providers will need to consider the standard practice of ‘back translation’ as a means of securing this.

Independence

34 Translators may be internal or external to the provider. In all cases, however, providers should take steps to ensure they are independent from the teaching, examining and marking processes, and of any relationships with individual students or the institution’s student body, in respect of the students whose work is being translated.

Nomenclature for bilingual modules

35 In order to avoid any misunderstanding or misinterpretation by students, the awarding body and other organisations for example employers, care must be taken to establish clear nomenclature to differentiate, for example, modules which may be examined in the Welsh although the language of delivery is English, from modules which have been examined only in Welsh or only in English.

Transcripts

36 Transcripts should reflect the extent of delivery and examination in Welsh so that this is clear to the student, the institution and to any prospective employers.

Postgraduate research degrees

37 In addition to the guidelines outlined above, arrangements for the examination of postgraduate research work through the medium of Welsh must be clearly specified and agreed with the research student at the beginning of the research programme, and any subsequent changes must also be agreed between the institution and the research student. A record should be kept of such agreements and any agreed changes. It is highly desirable that postgraduate research students have equal opportunities to be assessed in Welsh. At present, in certain situations, it may still prove to be impracticable to expect highly specialised work in some subject areas at this level to be examined, be it by thesis or in the viva voce, in Welsh.