
Advice document: Bilingual drafting, translation and using Welsh face to face



Comisiynydd y
Gymraeg
Welsh Language
Commissioner



Background

The principal aim of the Welsh Language Commissioner, an independent body established by the Welsh Language (Wales) Measure 2011, is to promote and facilitate the use of the Welsh language. This entails raising awareness of the official status of the Welsh language in Wales and imposing standards on organisations. This, in turn, will lead to the establishment of rights for Welsh speakers.

Two principles will underpin the work:

- In Wales, the Welsh language should be treated no less favourably than the English language
- Persons in Wales should be able to live their lives through the medium of the Welsh language if they choose to do so.

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Important note:

A number of organisations are required by statute to comply with the standards regime under the Welsh Language (Wales) Measure 2011. This advice document is not a statutory code of practice under that Measure and should not be referred to in interpreting of the standards. It is a matter for organisations to decide how to comply with Welsh language standards. In doing so, they may refer to this document. But failure to act in accordance with its recommendations will not necessarily mean non-compliance with the standards.

For other organisations, this advice document will support them to provide first-class bilingual services and to operate in a context where the Welsh language has official status in Wales.

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1 Foreword

The Welsh Language (Wales) Measure 2011 established the principle that people have rights to use the Welsh language in their everyday lives. The Welsh language standards bring this principle to life and explain what organisations need to do in order to ensure that those rights become a reality.

Our survey of the internal language practices of Welsh organisations revealed that English is still generally the main written language used.¹ This isn't an official policy which has been committed to paper, but it is a deep-rooted habit which will almost certainly die hard. There has been a general tendency to rely too heavily upon translation services to create bilingual documents rather than developing staff's skills to draft bilingually for themselves.

The result of this unofficial policy is that it's extremely likely that staff with Welsh language skills are currently drafting content in English from force of habit. We hope that the sections on bilingual drafting in this document will encourage organisations to look anew at the way they operate, and consider how they can develop individuals' confidence and skills to use more Welsh in the workplace.

Some organisations will even have a statutory duty to foster the Welsh language skills of their staff by assessing their skills and providing appropriate training as a result. Having identified and developed these valuable skills, the next logical step would be to provide contexts in which these skills can be used for the benefit of the individual and the organisation. This document also emphasises from the outset the benefit of bilingual drafting to organisations and the importance of fostering the linguistic skills of staff in order to ensure bilingual texts or meetings of the very highest standard.

Some parts of this document may be familiar ground for those who have been working in this field for some time; however the content has been adapted in order to ensure that it meets the new requirements of the Welsh language standards and recent developments in the field. We hope that this document will provide clear guidance for you on how to address these new requirements and will be a useful guide for you as you plan your services and your working practices for the future.



Ieathu Roberts

¹ *A Measure of Success: The Welsh Language Commissioner's Assurance Report 2017–18:* <http://www.comisiynyddygyrmaeg.cymru/Cymraeg/Rhestr%20Cyhoeddiadau/REF18075%20-%20CD004%20-%20Sicrwydd%20Report%20-%20STP2.pdf> (Accessed 12 February 2019).

2 Introduction

- 2.1 The aim of this document is to support organisations to make innovative, effective and responsible use of all kinds of translation services in order to facilitate the provision of first-rate bilingual services.

Audience

- 2.2 The main audience for the document is policy-makers, heads of service and officers responsible for ensuring that there are appropriate procedures in place to enable organisations to provide bilingual texts. It will also be of specific interest to those who have bilingual drafting skills or who wish to further develop those skills.
- 2.3 Although parts of the document will be useful and interesting to translators, the document is not primarily aimed at translators, but at those responsible for arranging or commissioning translation services in an organisation. Nevertheless, when putting translation and drafting arrangements in place, there should be discussion and sharing of information with those affected by the arrangements, whether they are translators or other officers.
- 2.4 Much of the content of this advice document will already be familiar to some individuals and organisations and may reflect their current practice. For other organisations or individuals coming into this field for the first time, we hope it will offer a comprehensive overview of the field. This is also a field that is constantly developing as a result of technological developments or new language duties, and this document attempts to respond to these also.
- 2.5 The situation, arrangements and needs of individual organisations will vary significantly depending on the size of the organisation, the nature of its work, and the statutory duties on it to provide services in Welsh or bilingually. Consequently, not every element of this advice document will be fully relevant – or even possible – for every organisation.
- 2.6 The document also recognises that there are several potential approaches, and it is not possible, naturally, for the document to cover every eventuality. It is also not possible for this document to proclaim the best way of going about it: rather, the document notes a number of principles, suggestions and considerations as well as examples of good practice for organisations to apply to their own situations.

Structure

2.7 The document is divided into three parts and addresses the three main approaches to planning bilingual services for the public:

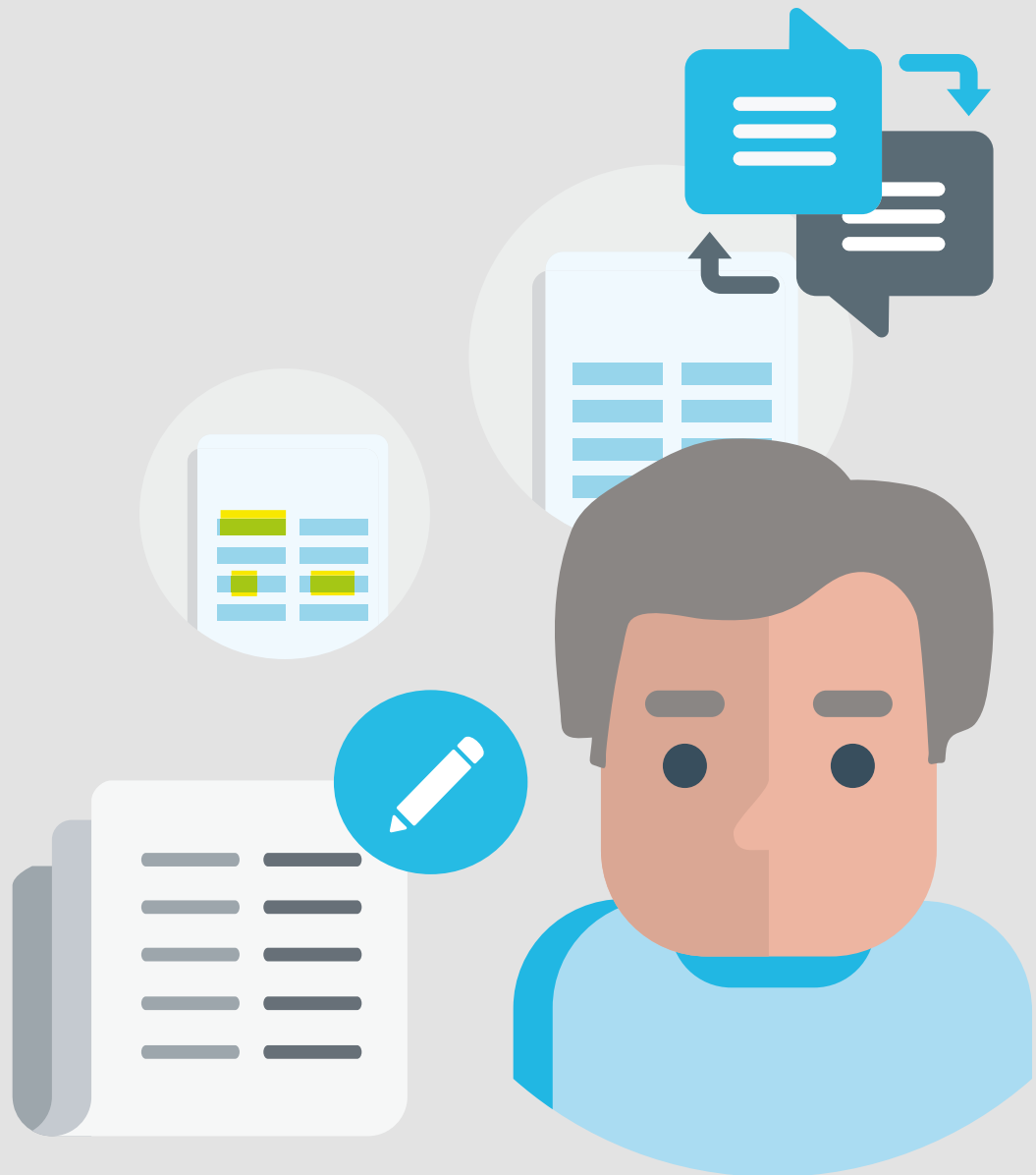
- **Part 1: Bilingual drafting**
- **Part 2: Text translation**
- **Part 3: Using Welsh face to face.**

2.8 However, it is possible to cross-reference between the sections, since considerations specific to one approach is often relevant or can give further context to another.

2.9 The document focuses specifically on the following matters:

- What are the advantages of drafting bilingual documents?
- How should an organisation arrange an effective translation service in a way that ensures quality and value for money?
- What support can information technology provide for those who are drafting documents, translators and organisations commissioning translation?
- How can events be arranged and held in a way that allows people to take part in their language of choice?

Part 1: Bilingual drafting



3 The advantages of bilingual drafting

- 3.1 Usually, the easiest way of providing bilingual texts for the public is to encourage officers to draft text bilingually from the very beginning. This is certainly the best way of ensuring that the organisation does not need to depend on translating everything in order to provide bilingual services, and that the organisation makes the most of the language skills of officers.
- 3.2 Bilingual drafting can be less costly in some circumstances than commissioning translation, and it would benefit organisations to consider how best to use the skills of officers. For example, it may be more convenient and cost-effective for officers to draft short texts such as leaflets, e-mails or web page text bilingually themselves. On the other hand, using a translator to provide a translation of a long or technical document would free up an officer to undertake other duties.
- 3.3 The advantages of bilingual drafting for organisations of all kinds cannot be overstated. There are clear advantages to this approach in terms of:
- having better control over the timeline for producing bilingual text
 - ensuring that the author has overall control over the way messages are conveyed and the quality of the writing in both languages
 - ensuring that the correct and appropriate terminology is used and that the text in both languages follows the organisation's house style
 - enabling officers to maintain and develop their language skills in both languages.

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- 3.4 There are of course further advantages to drafting messages bilingually for social media, bearing in mind the responsive and changing nature of those media. Having officers to hand who are confident drafting bilingually means it is possible to:
- respond quickly to any relevant news stories, comments or questions received and engage with followers 'there and then'
 - make the most of the short and snappy nature of social media and experiment with the use of idioms, cultural references and perhaps more regional or informal language depending on the target audience
 - adapt text for various audiences rather than translate directly.
- 3.5 As well as these practical advantages, bilingual drafting can strengthen the text in both languages, ultimately raising the standard of publications generally. Considering how to convey the same information in the other language can be a great way of:
- revealing weaknesses in the original
 - forcing the author to look again at any vague aspects in either language
 - ensuring that terms, names and quotes are accurate and consistent in both languages
 - ensuring originality in the wording of advertisements, slogans and initiative or project names.

4 How should we support officers to give it a go?

- 4.1 There are several practical steps you can take to encourage and support officers to start drafting text bilingually. The most important, without a doubt, is to establish an ethos in which bilingual drafting is a natural part of an organisation's activity. **To this end, make sure that you communicate clearly to officers that this is an approach that you favour and that officers will be given every support to try drafting bilingual documents.**

It can also be useful for you to:

- Encourage officers to draft shorter pieces to begin with.
 - Recognise the bilingual drafting process as a formal part of the timetable for preparing a document or publication.
 - Arrange appropriate training and support for officers to make the most of their language skills and further develop them.
 - Invest in developing officers' Welsh language drafting skills by providing or drawing attention to basic language resources referred to in [section five](#) below or by providing appropriate language improvement training (*gloywi iaith*).
 - Ensure that a proofreading service is in place to support officers to write text that is appropriate for publication.
 - Encourage officers and translators to work together to draw up terminology lists for specific subject areas.
 - Encourage and facilitate opportunities for officers to read quality Welsh language texts written in all language registers (literature, magazines, news articles) in order to strengthen their language skills and capabilities generally.
- 4.2 If you are an organisation with an internal translation unit, you could consider developing your translators' skills so they can support officers to draft bilingual documents. They could provide training or a mentoring service for officers who wish to draft texts bilingually as well as a proofreading service that provides feedback on their efforts. This would be a means of developing the skills and career opportunities of translators if they so wish, and would bring variety to their daily duties.

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- 4.3 If you do not have an internal translation unit in your organisation, you could consider establishing a contract with external translators, editors or language experts to provide the service outlined above to officers who wish to start drafting texts bilingually. You could also establish a pattern of having one translator 'on-call' to proofread short texts there and then for immediate publication; such a system could be very useful in the context of social media messages.
- 4.4 Bilingual texts being drafted by officers will need to be proofread carefully before they are published or printed, as would also be the case with bilingual texts provided by professional translators.²

Please note that good language skills in both English and Welsh are needed for officers to be able to undertake bilingual drafting for public purposes. Being able to speak Welsh does not necessarily mean that officers' written work will be of sufficient standard for publication immediately.

On the other hand, messages, minutes and internal reports are a different matter, and officers should be given every encouragement to use their Welsh language skills in these contexts. By practising their use of the Welsh language internally, officers can develop the confidence and skills to move on to drafting public texts in due course. There are practical suggestions for supporting officers who wish to draft bilingually in [section five](#) below.



² The Welsh Language Commissioner provides a free proofreading service for businesses and some third sector organisations, up to 1,000 words. See the Hybu microsite for businesses and third sector organisations for more information: <http://www.welshlanguagecommissioner.wales/hybu>.

5 How can information technology support this work?

- 5.1 All manner of aids are available to support people to write Welsh correctly and to draft bilingual documents. Some organisations will be under a statutory duty to provide some of the resources described below, but in order to support bilingual drafting, it may be helpful for all organisations to ensure that officers:
- Use Welsh language interfaces for software where this is available.
 - Know how to tag a document's language correctly, e.g. to identify Welsh language text as such when using Microsoft Word. Microsoft Office programmes, when used with a Welsh Language Interface Pack, provides a Welsh language spellchecker if the text is identified as Welsh language text (more information about this is available on the Commissioner's website, and the Welsh Government's website includes some practical videos showing how to install some of this software [How to ... use Welsh language technology](#)).
 - Use spellchecking and grammar checking software such as Cysill, which is part of the Cysgliad package. See the Cysgliad website for more information about buying this software package which also includes the Cysgeir dictionary: [Cysgliad](#). A version of Cysill is also available free of charge on-line for checking short translations: [Cysill Online](#) and a Mac version of Cysill is also available for free.
 - Know about the dictionaries and reference books (printed and electronic) available to them and have easy access to them. A number of standard dictionary and terminology resources are available free of charge online. A useful list of these is available on the Terminology and dictionaries page on the Commissioner's website: [Terminology and dictionaries](#).
 - Know about the [List of Standardised Welsh Place-names](#) on the Commissioner's website in order to check the standard spelling of place-names and check if there are different forms in Welsh and English.
 - Receive training on how to search for information in these reference books and how to use the information appropriately.
 - Receive training on which machine translation services are available to them and how to use them responsibly and effectively.
- 5.2 Some types of translation software can facilitate the work of officers drafting bilingual documents too, by providing either components of previous translations or machine translations for them to use, adapt or edit. These technologies and their advantages are discussed in more detail in [section seven](#) below, but their use would save time and effort for officers and ensure consistency with previous texts.

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- 5.3 The user would need to understand the limitations of the software, and edit and adapt the translations as needed to bring them up to the expected standard. The organisation would also need to ensure that it has appropriate internal procedures in place before using the software in this way, including providing guidance on matters of confidentiality etc.

Machine translation in the bilingual workplace

- 5.4 Organisations could also consider the extent to which automatic or machine translation software could facilitate bilingual communication in a bilingual workplace. For example, machine translation software can assist people who do not understand Welsh to gain a general idea of the contents of a document or e-mail written in Welsh. This would be very useful in a bilingual workplace where individuals wish to work through the medium of Welsh in a work setting where their colleagues do not understand the language. For example, an employee who does not speak Welsh could acquire a general understanding of the content of a document or e-mail written by another colleague in Welsh, without the need for the person drafting to translate everything. However, please note that machine translation cannot be completely relied upon to answer messages.
- 5.5 The National Assembly for Wales has innovated in this field by working with Microsoft to ensure that Welsh is one of the languages offered by Microsoft Translator. This means that machine translations can be viewed in Microsoft packages, including Word and Outlook, without the user needing to employ an external machine translation service.
- 5.6 Before adopting this practice, detailed guidance should be prepared for officers on how best to use this software, drawing specific attention to both the advantages and risks.
- 5.7 For one thing, it is important to emphasise that the translation provided would be a rough translation, and it may be that a specific emphasis or detail would be lost in such a translation. The accuracy of text produced by machine cannot be wholly relied upon, even if, at first glance, the translation appears to be neat and accurate. Although the outcome from using this type of software is generally very good – and is improving constantly as the technology evolves – they are not always reliable, even in providing a rough translation for the purposes of internal discussion. For example, the software does not always identify the negative in Welsh, which can produce a translation with the exact opposite meaning of the original!

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- 5.8 Such software can not be completely relied upon even to provide quick and easy translations, and a translation produced by machine should certainly not be published without it being edited thoroughly by a human translator. Machine translation can also not be relied upon to provide the most succinct translation, a relevant consideration when it comes to the character limits in a Twitter message, for example.

Machine translation software should not be relied upon at the expense of developing the language skills of officers and increasing their confidence to read and understand written Welsh for themselves. However, using this software can contribute towards developing skills and confidence.



Part 2:

Text translation



6 Arranging text translation

- 6.1 If there are no officers available to draft documents bilingually, an organisation will need to ensure that there are arrangements in place to provide translation services. How an organisation goes about translating from Welsh to English will be a matter for the organisation itself:
- Some organisations will have internal translation units that can fully meet the requirements.
 - Some organisations will contract all of the translation work out.
 - Others will use a combination of internal translators and external contractors.
 - Others still will share the translation work with other similar organisations, e.g. via a service level agreement or one centre providing translation for the whole sector.
- 6.2 The principles and considerations noted in this section are in fact relevant to each of the above situations. More detailed practical advice is provided in [section eight](#) on the process of arranging a translation job, and there is further guidance in [section seven](#) on how information technology can facilitate translation and bring significant financial savings.

Using a professional translator

- 6.3 It is important to realise that not everyone who speaks two languages can necessarily *translate*.³ Translation is a specialist profession that requires specific skills and experience to produce the highest-quality professional translations. The most important principle, therefore, is that a competent and professional translator should be employed to undertake every piece of text translation on behalf of the organisation.⁴
- 6.4 Using a translator who is a member of a professional association is a way of ensuring that you use a competent translator. Members of a professional association are subject to codes of practice that outline the professional standards that members are expected to adhere to in the course of their work in order to provide the best possible service to their clients. These codes of practice will usually commit the translators to specific standards of confidentiality and impartiality, for example.⁵

³ We should emphasise here that translation is a very different skill to bilingual drafting. Bilingual officers can draft their own texts bilingually from the very beginning, adapting their choice of vocabulary, syntax and language register in accordance with their language skills: being able to respond to the work of another author and replicate it in another language, conveying the exact meaning and feel of the original without slavishly following the original's syntax requires very specific skills and training.

⁴ Please note: The UK does not have a system of sworn translators like some countries who operate civil law.

⁵ Here is a link to the Professional Code of Practice of Cymdeithas Cyfieithwyr Cymru, the association of Welsh translators and interpreters, for example: <https://www.cyfieithwyr.cymru/en/find-a-translator-interpreter/ymdygiad-profesiynol-1> (Accessed 12 February 2019).

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- 6.5 Another advantage of using a translator who is a member of a professional association is the focus such associations have on training and continuing professional development (CPD). Members are encouraged to follow a continuing professional development plan to ensure that their knowledge and skills are up-to-date so they can provide a high-quality service for their clients.

It is important to check that a translator has professional membership and that there is no risk that the work will be sub-contracted to other translators without appropriate membership.



- 6.6 Cymdeithas Cyfieithwyr Cymru (the association of Welsh translators and interpreters) is the only professional association that represents the Welsh/English translation profession specifically. They have a useful search engine on their website that enables you to search for a translator that is suitable to your needs: [Find a translator](#). Some qualified translators who translate from Welsh to English and vice versa are members of other professional associations, such as the Chartered Institute of Linguists (CIOL: <https://www.ciol.org.uk>) and the Institute of Translation and Interpreting (ITI: <http://www.iti.org.uk/>).
- 6.7 Translators must succeed in the association's exams in order to become members of Cymdeithas Cyfieithwyr Cymru. They have two levels of text translation membership: Basic membership and Full membership. Cymdeithas Cyfieithwyr Cymru state that members who have passed their Full exams are expected to submit work that needs no further editing. They also offer a Translation Quality Assessment Service for a fee – this advisory service can assess the quality of a translation if someone wishes to complain about the quality of the work of a member of Cymdeithas Cyfieithwyr Cymru.

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- 6.8 In purchasing translation services from external providers, it is also important to ensure that appropriate arrangements are in place in terms of:
- indemnity insurance
 - translation quality control procedures
 - a complaints process to deal with complaints about translation quality.

Creating a successful internal translation unit

- 6.9 Having an internal translation unit has clear advantages for an organisation, providing a workforce of professional translators who are available to respond to the organisation's translation needs and prioritise any work in line with the policies of that organisation. Such units can also contribute significantly to the Welsh language ethos of an organisation, and the language skills and expertise of translators could be used to support other officers in the organisation to draft documents bilingually as noted in [4.2](#) above. This in turn will support the organisation to meet wider policy objectives in relation to the Welsh language and ensure that the organisation meets its language duties in a sustainable way.
- 6.10 However, it may be that the translation unit will not have sufficient capacity to respond to all of the organisation's translation requirements. In such cases, the unit will have a crucial role in terms of quality control, ensuring that every piece of work undertaken on behalf of the organisation is consistent with the house style and standard terminology of the organisation in question.
- 6.11 Every translation unit will be run differently, and decisions involving the governance of such a unit would be a matter for the organisation itself. We note below some general considerations and practical tips that could be useful in establishing an internal translation unit:

Structure and staff skills

- It is useful for the translation unit to be based in an appropriate place within the organisation's structure, for example in the chief executive's unit or the central services team. It could also be useful to have a direct link between the translation unit and the departments responsible for the organisation's compliance with language duties, or for the organisation's website and marketing activities, or its public relations activities.

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- Ensure there is an appropriate staffing structure in all translation units. Providing translators with clear and appropriate career pathways is a way of attracting, developing and retaining good translators. It can be useful in terms of cost and workforce development for that structure to include translators at all levels – from experienced translators with strong mentoring skills to trainee translators. Consideration should also be given to translator pay structure, ensuring that it recognises their experience, skills and qualifications.
 - Ensure there is a focus on the continuing professional development of translators and that a programme of appropriate training is provided to develop their skills and keep them updated about new trends and developments in the sector.
 - As part of this, there could be consideration for preparing translators to sit professional association exams or to gain a relevant academic qualification. For example, the Professional Translation Studies course developed through Coleg Cymraeg Cenedlaethol funding, which is offered by Aberystwyth University, enables students to study for a Certificate, a Diploma or a full MA: [Professional Translation Studies](#). Translators can also follow individual modules that are of interest to them.
 - Encourage translators to develop expertise in specific areas and to gather evidence to demonstrate the expertise developed. For example, Cymdeithas Cyfieithwyr Cymru have established Areas of Professional Expertise to recognise the expertise of their members in communication and legislative areas.
 - Ensure that there are appropriate resources and software to facilitate the work of the translation unit, including word processing software, translation memory software, translation workflow management software, grammar and spellchecking software, standard printed reference books and links to suitable terminology databases. See [5.1](#) and [section seven](#) below.
 - Also ensure that translators receive appropriate training in these areas – specifically in translation technology – to ensure they are aware of the latest developments and can make the most of them to improve and speed up the translation process. Some software developers provide free training webinars for clients.

Administration

- Ensure that there are appropriate methods of processing translation work, including receiving, recording, prioritising, translating and returning the work.
- Also ensure that translators have sufficient administrative support to ensure a smooth translation workflow and the best use of the time and skills of translators.

Utilising the translation unit

- Make every officer in the organisation aware of the existence of the translation unit and the skills it contributes to the organisation's work.
- Draw up guidelines for officers on how to commission translation work and what is reasonable for them to expect from the translators in terms of timescales for returning work etc. These guidelines could be published in a central place such as the organisation's intranet, and any new officers should be made aware of them.

Working with similar organisations

- 6.12 Organisations could identify similar bodies (perhaps working in the same region or in similar sectors) and consider ways of working with them to commission translation;⁶ by establishing a joint translation contract or by establishing one centre to be responsible for translation in a specific area or sector. They could also come to an agreement on sharing translation memories or terminology lists with other organisations to ensure consistency of vocabulary and style across the sector and ensure financial savings in the process.
- 6.13 There would be clear advantages for organisations when commissioning translation in terms of:
- ensuring financial savings
 - improving the quality of the finished product
 - ensuring that the individual organisations are able to comply with their statutory duties.
- 6.14 It would be a way of developing the expertise of specific translators in specific sectors, allowing them to familiarise themselves with the vocabulary, style and needs of a specific sector.
- 6.15 It would also lead to advantages for service users who would be able to benefit from consistency in terms of the quality of the service across the sector.
- 6.16 Even if an organisation did not choose to work formally with other organisations in commissioning translation, it could choose to share relevant translation memories or terminology lists with other organisations or the public in order to contribute to facilitating translation generally.

⁶ An example of this would be the work undertaken by the Welsh Government to draw up a framework agreement for translation and interpreting for the whole of the public sector. This agreement is managed by the National Procurement Service and the new framework agreement went live on 1 November 2018. The main advantage for users of this agreement is that the National Procurement Service undertakes the tendering process on their behalf, leading to cost savings, and that the quality of the providers has been assessed. Note that one of the agreement's criteria is that the provider should be a full member of a professional association.

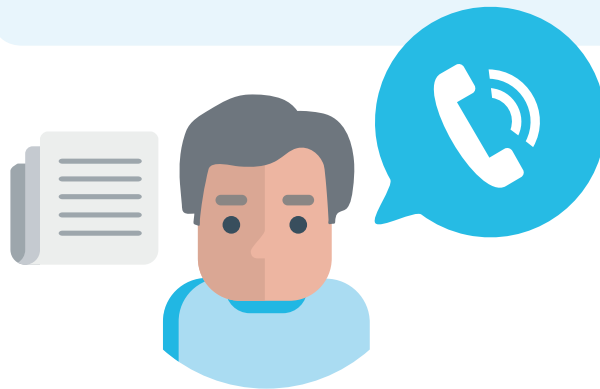
Developing a good working relationship

- 6.17 Whichever way your organisation chooses to procure translation services, it is useful to develop a good working relationship with your translators. Establishing an effective working relationship, where feedback is welcomed from translators and clients alike and where an open discussion takes place, can ultimately improve the quality of publications created on the organisation's behalf.
- 6.18 One practical way of establishing a relationship with the translators is to specify a member of staff as a link between the organisation and the translator and to keep a detailed record of the work to be translated, such as the wordcount and the timescale for completing the work.⁷ This will aid in:
- avoiding confusion or misunderstanding in commissioning translation
 - avoiding repeat translation of similar texts since a record of all previously translated text will exist
 - developing the expertise of that officer and their awareness of the organisation's translation needs and practice
 - establishing one easy point of contact for translators within the organisation to co-ordinate enquiries quickly etc.
- 6.19 In commissioning external translation, it is important to ensure that the terms and timescale for the work are clearly agreed in advance. Below are some points to remember:
- Translators usually charge per 1,000 words of text, but most translators also have a minimum charge.
 - If you are using translators to translate messages for social media, it would help to plan messages in advance and provide a fortnight or a month's worth of messages to translate together where possible.
 - Sometimes, translators will charge by the hour, to recognise the creative energy and effort attached to translating brand names, slogans or marketing materials, for example.
 - You should check in advance whether or not the translator charges VAT.

⁷ This model will of course vary depending on the size of the organisation. In larger organisations, perhaps this model would work at a departmental or directorate level.

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- 6.20 You will need to come to an agreement on which software translators should use in their work and in which format the final work is returned in order to ensure that this is in line with the organisation's processes and needs. Some organisations who commission translation will be willing to install their own software on the computers of external translators to facilitate this.
- 6.21 It is useful to get to know the strengths and expertise of various translators and commission work accordingly. For example, some translators specialise in translating complex legal or technical documents, and others have a flair for translating creative materials. It would also be useful to have processes in place to identify the type of document you are working on and match that work with the most appropriate translator. You could also consider using the same translator for a series of similar tasks in order to ensure consistency of style across the work.
- 6.22 It is good practice to involve translators in the work from the very beginning, rather than drawing on their expertise only at the end of the project. Closer collaboration between translators and experts allows you to identify any issues in either language early on in the process. For example, if a translator was part of the discussions at the beginning of the project, they could:
- identify difficult vocabulary or terminology that they will need to plan for
 - advise about idioms, concepts or slogans that cannot easily be translated or adapted.
- 6.23 If the translators have not been involved from the very beginning, it is vital that you brief them fully about the work in question, explaining the aim and context of the work, the target audience and any useful background information. You will need to ensure that the requirements of the task are completely clear, and you should also identify any unfamiliar or specialist terminology that could arise in the work.
- 6.24 Make the most of the language skills of your translators, ensuring that you have a relationship or agreement that allows you to liaise with them to check any details in a translation or to ask any minor linguistic questions you may have.

Also ensure that your translators are aware that they are welcome to contact you to ask questions during the translation process – to check the meaning of the original or to get a better understanding of a document's objective or audience. They will also be able to provide advice about any text that is vague or needs strengthening in the original document. Indeed, the translation process can improve the quality of the original work, since the translator will be a new pair of eyes to look at the work.



- 6.25 It is prudent to ensure that you have arrangements in place to allow you to request short translations at short notice. You will also need to agree with your translators on the best way to manage timescales for returning urgent work or work where tight or statutory deadlines will cause pressures. You can also discuss how best to use your translators to translate short-notice messages for social media.
- 6.26 Managing larger projects is yet another challenge. If you are translating a long document or a series of related documents, it may be that the time requirements will mean that the work will need to be divided between more than one translator. It is important that you discuss such a case with your translators in advance, ensuring that there are processes in place to guarantee the quality of the work and the consistency of style and terminology if more than one translator is working on a document.
- 6.27 You should ensure that checking language accuracy is an integral part of every translation project. You could make it clear that this is a contractual requirement.

7 Technology and other resources to facilitate the work of translators

7.1 Language technology can assist translators by facilitating and speeding up their work. It can also support organisations who commission translation to quality assure the work being commissioned and to ensure value for money.

7.2

Human translators must be involved in the translation of a document; a professional translator cannot be replaced by a machine. Software can support a translator's work, but it should never be used instead of a professional translator. An organisation should certainly not rely on links to online machine translation software to provide a Welsh version of its website or other publications.

7.3 In the sections below, we outline the main types of software available to facilitate the translation process as well as suggestions on how to use them in practice for the benefit of both translators and organisations commissioning translations.

Translation memory software

7.4 Translation memory software is a type of database that keeps a record of previous translations that can be re-used. When a document for translation is loaded into the software, it will search the memory for segments that can be used to translate the new piece. These segments vary in size and can include terminology, sentences or even whole paragraphs.

7.5 Using this software can facilitate the process of translating a document by:

- removing the need to translate text from scratch when it has already been translated
- leading to more consistency of style and terminology
- enabling translators to translate more words in less time.⁸

7.6 A further advantage is the potential for organisations to share translation memories with other organisations so they can re-use them and benefit from them. The Welsh Government, for example, shares a series of useful translation memories through [BydTermCymru](#), including the Government's strategies and legislative memories.

⁸ Some recent research also suggests that using such software can reduce the cognitive strain on translators.

The outcomes from using translation memory software is completely dependent on the quality of the translations loaded into it. It is vital to ensure that the translations being loaded into the software are of a high quality in order to ensure that the product offered by the software is also of a high quality. It is important to ensure, therefore, that there is a quality control process in place and that the translation memory is edited regularly to ensure the memory's consistency and accuracy.



7.7 It is also important that those responsible for commissioning translation are aware of the risks to data security when using translation memory software, and draw up appropriate guidelines to ensure compliance with relevant legislation. It is important to ensure, for example, that the organisation in question is happy with the security arrangements if the translation memory is stored in the cloud. Care should be taken when using the software to translate confidential or sensitive information. This is particularly true if the software used stores information in the cloud or if the translation memory is shared with a network of translators. Consideration could be given to adding people's names and other personal details to the translation at the end of the process, in order to avoid retaining a record of these details in the memory.

7.8 Many commercial companies provide their own versions of this software,⁹ including the Language Technologies Unit at Bangor University who have created CyfieithuCymru (TranslateWales) that has a Welsh language interface.¹⁰ Some of the available products are now quite sophisticated and enable the user to:

⁹ An organisation does not need to use the same type of translation memory software as their external providers. Translation memory files can be transferred from one system to another by using a standard international format such as .tmx or .txt.

¹⁰ <http://techiaith.bangor.ac.uk/rheolyn-and-cyfieithyn/?lang=en> (Accessed 10 August 2018).

- create and manage lists of standard terminology for the purpose of specific projects
- access these personal terminology databases, as well as standard dictionaries and integrated spellcheckers, during translation
- link with external machine translation software
- arrange and manage translation projects and enable a dispersed team of translators to work together to translate the same document.

7.9 As an organisation invests in translation memory software, it is important to remember that information technology officers need to receive appropriate training to be able to install the software and assist with any issues.

Not paying to translate the same text twice

7.10 Not every organisation has a translation unit, and even if it does have an internal unit in place, an organisation will often still need to turn to external providers to meet the translation needs of the organisation. In such cases, translation memory software can be helpful to ensure that an organisation is not paying several times to translate the same text, and to ensure consistency between the work translated by various external providers.

7.11 Translation memory software analyses how much of the contents of a new document for translation matches with the contents of the translation memory, creating a report that can be used as part of the commissioning process. This is an example of the type of analysis that translation memory software can undertake on your behalf:

Percentage match:	Wordcount	Word percentage %
Repetition in document	277	6
100% (Full match)	924	20
95%–99%	693	15
85%–95%	370	8
75%–84%	462	10
50%–74%	92	2
No match	1802	39
Total	4620	100

7.12 In the example above:

- 6% of the words in the new document are repeated within the document itself. They may not need to be translated again, but they certainly need to be edited.

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- 20% of the text in the new document are sentences that are exactly the same as sentences stored in the memory (full match). They may not need to be translated again, but they certainly need to be edited. It is important to remember, for example, that translation memory cannot identify the context of sentences, unlike a human translator, although some of the latest programmes can identify whether the segments that appear on either side of the segment in question also match.
 - 35% of the words in the new document are in sentences with a partial match between the memory's contents and that of the new document. These translations need to be carefully checked, edited and refined.
 - 39% of the words in the new documents are in sentences that are in no way similar to the contents of the memory. All these sentences need to be translated from scratch.

7.13 The above results can be used to determine the price for a piece of translation work. In commissioning translation work, different rates could be paid depending on the percentage match between the document and the memory's contents. Indeed, three-tier pricing systems¹¹ are becoming increasingly common in the translation industry, for example:

- 1 You could arrange to pay just a proportion of the usual cost per thousand words to translate or check the parts of the document that fully match (100%) the memory's contents and the parts that are repeated within the document. The expectation is that those segments will not need to be amended; however, it is important that these segments are checked, and it is appropriate to pay the translator an editing fee for checking that they are accurate and appropriate.
- 2 A higher proportion of the usual cost per thousand words could be paid for components that partially match 50–99%. It is envisaged that these components will need to be amended since they do not match exactly, but everything will not need to be translated from scratch.
- 3 The usual rate will need to be paid for those segments that need to be translated from scratch.

7.14 However, it is not appropriate to use translation memory for every piece of work, and it can sometimes be useful not to limit a translator's creative skills if the text requires creativity or if the language register needs to be different to the type of text likely to be provided by the software.

¹¹ We should emphasise that this is just an example, and that pricing systems with more or fewer tiers are possible. It is for the organisation to decide and discuss the most appropriate way of determining the pricing system with its suppliers.

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- 7.15 If an organisation chooses to outsource translation through a procurement process, it could consider the following:
- Make it a contractual requirement that providers use translation memory software.
 - Ask the provider to create a specific translation memory for use when translating work for the organisation, and ensure that this memory is kept confidential.
 - Ask the provider to keep a list of terminology that is specific to the organisation's work and update it regularly. Translators can also create lists of terminology within translation memory software. You can also ask them to load terminology lists into their translation memory software to ensure they use the right terminology when translating work on behalf of the organisation.
 - Make it a contractual requirement that the commissioning organisation owns the translation memory. It is important to ensure that the translators understand and consent to share their translations with other providers through the memory. This memory can be used if the organisation procures translation in future.
 - If the organisation itself uses translation memory software and retains a central copy of the organisational translation memory, it could make it a requirement that new translations will be paid for according to the match rate between the contents of the new document and the contents of that memory. The organisation will then share relevant components of the memory with the external providers so they can use those components when translating. When the translation has been undertaken, the organisation can ask for a copy of the memory as well as the finished translation, in order to update the organisation's translation memory.
- 7.16 When considering this approach to commissioning translation, it is important to consider the fact that some types of documents will give better outcomes than others when using translation memory:
- There will of course be a higher match between reports that follow a similar structure or template.
 - The software lends itself well to factual texts with a measure of repetition or a specific formula, for example meeting minutes and agendas, or certificates and licences.
 - It can also be a useful tool when translating policies or strategies, especially if they are to be amended over time: using translation memory software means that only new or amended clauses will need to be translated, saving on the cost of translating the whole document from scratch.
 - Financial savings can also become more and more evident over time, for example in the context of quarterly or annual reports.

7.17 Some types of translation memory software also enable you to lock segments that should not be edited any further. However, remember that the organisation will pay an 'editing' fee every time a translator will need to check a segment. So, if an organisation is aware that parts of a document (e.g. opening paragraphs of a template letter) have already been translated, it is actually more prudent not to send those sections to the translators at all. This will mean that the organisation avoids paying an 'editing' fee for these segments, and also reduces the risk of translators amending any paragraphs for which the organisation has already determined the standard text.

Machine translation software

7.18 Another type of software that can support translators' work is automatic translation or machine translation software. Machine translation software will offer the translator translations that are based on an analysis of a language corpus and/or based on its grammar. Great leaps forward have been made in this area over the last few years. Several companies now provide machine translation from English to Welsh and vice versa, and the standard of the output is improving all the time as the technology develops. We hope to see further significant developments in this area over the next few years as some of the latest revolutionary technologies are applied to Welsh.¹²

However, the standard and factual accuracy of translation rendered by automatic translation software is varied, and translation generated through machine translation should not be regarded as accurate or generated to an acceptable standard. A machine cannot understand background information or context like a human translator. Translations completed by machines must be edited before they can be published in order to avoid the risk to an organisation's reputation and to ensure that Welsh is treated no less favourably than English.



¹² See for example: <https://www.microsoft.com/en-us/research/project/neural-machine-translation/> (Accessed 12 February 2019).

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- 7.19 The current quality of machine translation from English to Welsh is generally weaker than the quality of machine translation from Welsh to English, as a result of the richness and complexity of the Welsh language. But in general, the translations provided by machine translation software have improved to such a degree that it is now *useful* for human translators:
- Machine translation can help translators by providing rough translations for further editing. It is used to this effect by the translation service of the European Commission and by the Translation and Reporting Service of the National Assembly for Wales, for example.¹³
 - It can therefore support the translator in the same way as translation memory software, since it provides a source of text for the translator to edit.
 - Some types of machine translation can be used within translation memory software in order to make the most of the translation memory and the results of machine translation at the same time.
- 7.20 Using a combination of translation memory software and machine translation software like this means that the translator will hardly ever need to create a translation completely from scratch. The result of moving to this approach is that the translator's role becomes more of an editor's role.
- 7.21 By using a combination of translation memory software and machine translation software, it can be useful to feed any terms or names that are likely to arise often into the translation memory to ensure that the machine translation software does not translate those elements incorrectly. Machine translation software can sometimes attempt to translate personal names, they can translate idioms literally or translate words with more than one meaning incorrectly (e.g. a chair at the table and the chair of a meeting are two different words in Welsh).
- 7.22 The type of editing that the translator will be required to undertake – the term used in the translation industry is post-editing – is different to general editing work, and it is important that translators receive appropriate training to further develop this skill. It can include:
- tidying up or re-arranging syntax
 - correcting minor errors
 - correcting more substantial errors
 - ignoring the proposed translation and re-writing whole components.

¹³ It is interesting to note that these organisations have developed specific machine translation systems to serve their own needs, i.e. systems that are trained with relevant corpus materials that are relevant to their areas of work and the type of language registers or writing styles that they use most. This is a general trend among organisations that produce a large amount of translated materials, and software such as Microsoft Translator Hub enables organisations to build machine translation systems for their own purposes: <https://hub.microsofttranslator.com> (Accessed 12 February 2019).

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- 7.23 The level of changes made to a document will also depend on the document's intention and intended audience. For example, perhaps tidying the translation and ensuring its accuracy will be enough for a document not intended for publication by the organisation, and attempting to create a perfect translation will not be necessary.
- 7.24 As with any new method, this is a skill that will need to be developed. With time, translators will become more confident in the process of post-editing and more familiar with the type of problems that commonly arise when using the software, which will further speed up the process.
- 7.25 As in the case of translation memory software, it is important to ensure that those responsible for using machine translation software or for commissioning translation are aware of the terms and conditions and the security risks of using the software. It is therefore wise to create appropriate guidelines to ensure compliance with relevant legislation. This software should not be used to translate confidential or sensitive information, since the text can be stored on servers beyond the user's control.

Translation project management software

- 7.26 Translation project management software is also available. Depending on the software, it can facilitate:
- requests for translation
 - sharing work between translators
 - setting work schedules
 - managing translation workflow from one central location
 - dealing with billing matters.
- 7.27 It may be useful to invest in this type of software if an organisation undertakes and/or commissions a great deal of translation. Several translation memory software providers now include these features as part of their software packages, so it may be that your organisation would not need to invest in a separate system.

8 Text translation workflow: practical advice

8.1 This section offers practical guidance on matters that are useful to consider in every stage of the process of arranging a translation.



Planning and scheduling

8.2 Make every officer in the organisation aware of which documents should be bilingual (including materials that must be produced in Welsh in line with the Welsh language standards or a Welsh language scheme) and the procedures you have in place to enable this.

8.3 Identify the nature of the document before beginning the drafting process and consider whether there are standard templates that could be followed to avoid duplication of effort.

8.4 Ensure that the organisation's standard bilingual templates are freely available to officers from a central place, such as the intranet. Consideration should also be given to sharing these with external translators in order to ensure that the translators stick to them instead of translating them from scratch every time.

8.5 It would also be useful to draw up a list of terminology that an organisation will use or ask a translation provider to collate them on behalf of the organisation. The terminology could then be shared with translation providers with a request to use them in their work.

8.6 Plan the translation very carefully ensuring that enough time is allocated, as part of the publication timetable for the translation and proofreading of the document in both languages – especially if a document needs to be designed. It is important to ensure that officers are aware how much time needs to be allowed to translate a document.

Preparing text for translation

8.7 Ensure that clear directions are available to those drafting documents for translation, providing clear guidance on matters such as:

- house style
- language register and audience
- terminology
- drawing up clear, appropriate and brief texts.

These directions could also be shared with the translators.

8.8 Ensure that officers – especially new officers – are formally trained to draft documents that adhere to the guidance above in order to improve the quality of the original documents.

8.9 Review the text thoroughly, always considering whether you could convey the same message more succinctly or whether the same message could be conveyed more effectively by using images or graphics. Using short sentences and a direct style can make the text easier to translate and improve the outcomes of using translation software.

8.10 Proofread the original text in detail, checking the spelling and grammar of those documents. It is important to ensure that there are no errors in the original and that it will not require amendment after the translation has been returned. This will help ensure that the translation memory is not impaired by poor quality texts.





Sending text to a translator for translation

- 8.11 Provide the translator with a final version of a document rather than a series of drafts that could complicate the translation process and increase costs. Perhaps you will wish to encrypt the documents and translation memories sent to the translators if the content is confidential or sensitive.
- 8.12 Provide clear directions to the translator, including details about:
- the document's objective and target audience
 - links to documents quoted in the text
 - specific terminology that should be used.



Receiving the work back from a translator

- 8.13 Check the translation carefully, trying to ensure that:
- it does not include spelling or grammatical errors
 - the translator has understood the objective and meaning of the original text
 - the texts in both languages match each other and there is no missing text.
- 8.14 Ask the translator if you are uncertain about any of the above elements, and ask the translator to look again at any of these elements to ensure that you are happy with the final translation.
- 8.15 If you are not happy with the quality of a translation, you should discuss this with the translator immediately and draw their attention explicitly to errors in the text, providing specific examples of stylistic features with which you are unhappy. However, please remember: everyone has a different writing style, and there are several correct and acceptable ways of expressing the same thing. Provide constructive feedback so that the translator can fully understand your needs and try to ensure that you are satisfied with the translation the next time.



Preparing text for publication

- 8.16 Proofread the translated text as well as the original text carefully, comparing the two versions. You should ensure that you are completely happy with the text in both languages before moving on to design the document – changing text after design can be laborious and costly.
- 8.17 It is a matter for organisations to decide who will be responsible for proofreading:
- Some translators will offer a proofreading service and will take responsibility for the accuracy of the work in its final format.
 - However, it can be helpful to use someone else instead of the original translator – a different translator or proofreader – in order to have an independent opinion and another pair of eyes on the work.
- 8.18 It can be a good idea to print the final text in both languages since it is easy to miss errors when reading on screen.
- 8.19 Ensure that the form and format of both languages are consistent and of the same quality. More guidance is available on best practice in bilingual design in the Commissioner's [Bilingual Design Guide](#).
- 8.20 Correcting proofs is an important part of the translation process. It is good practice to ensure plenty of time to do so thoroughly. Minor errors can often be costly, especially on signage.
- 8.21 Pay special attention to ensure that the diacritic marks (accents) required in Welsh are transferred correctly during the design of documents, posters, signage etc.
- 8.22 Ensure that clear procedures are in place to authorise the production of a final version of any signage or printed document. It is vital that officers are aware who has the final responsibility for the accuracy of proofs and signage plans.

Part 3: Using Welsh face to face



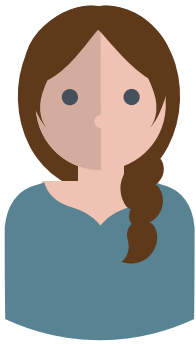
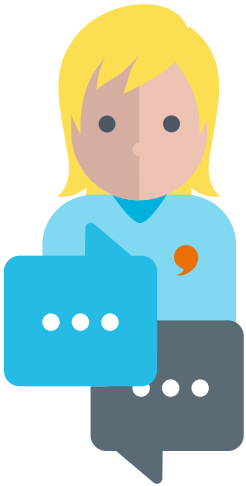
9 Arranging and holding bilingual meetings or events

- 9.1 Holding meetings or events through the medium of Welsh or bilingually, in order to respect the language choice of service users or customers, is one way of offering first-class customer service. However, it can also be much more than this. In some contexts, holding a meeting through the medium of Welsh or bilingually can be vital in ensuring an individual's well-being. Some organisations will have statutory requirements in relation to such situations, and a duty to comply with relevant standards. Other organisations will wish to offer a Welsh language service in these sensitive contexts as a sign of respect for the individuals in question.
- 9.2 The aim of this part of the advice document is to offer guidance on how to use Welsh effectively in all types of meetings in order to ensure the best possible results for everyone taking part. There is a discussion in [section 10](#) about situations that are familiar to us in the modern bilingual Wales, such as conferences or committees. However, [section 11](#) addresses situations where Welsh speakers have relatively new rights as a result of the Welsh Language (Wales) Measure 2011.
- 9.3 This part of the document has also been written with the assumption that the easiest and most cost-effective way of holding a Welsh language or bilingual meeting is to use the language skills of officers. This has clear advantages in terms of:
- ensuring financial savings
 - having more control over the timetable for holding meetings
 - ensuring that the right message is conveyed, in the right way
 - enabling officers to maintain and develop their verbal skills in both languages.
- 9.4 Meetings or events should be planned purposefully, using officers who can hold Welsh language or bilingual meetings where possible. Officers with the necessary skills should be identified and informed clearly that you would like them to develop specific expertise in holding Welsh language or bilingual meetings.
- 9.5 Other officers whose oral skills could be developed in order to hold meetings – or parts of meetings – through the medium of Welsh should also be identified, with appropriate training and support provided. It may be that some Welsh speakers will have much stronger oral skills than written skills, and would be more confident to try speaking Welsh at a meeting rather than creating a document in Welsh.

10 Using simultaneous interpretation to hold bilingual events or meetings

- 10.1 However, using simultaneous interpretation is unavoidable in some situations. When this is the case, using a professional simultaneous interpreter is a way of ensuring your work has a professional image and that a high-quality service is offered. Using a simultaneous interpreter who is a member of a professional body – and is therefore subject to a professional code of conduct – is also vital in protecting the interests of those taking part in the meeting.¹⁴ Considerations regarding ethics and confidentiality which are dealt with in such a code of conduct can be especially relevant in the context of meetings.
- 10.2 There is more general information about commissioning a professional interpreter in [section six](#) above, but here are some considerations that are specific to this area:
- This type of translation is very taxing, and if it is expected that an interpreter will need to interpret for more than 30 minutes non-stop, it is important to discuss this with the interpreter and consider employing a second interpreter to ensure they are able to take appropriate breaks.
 - When simultaneous interpretation from Welsh to English and from English to Welsh is needed in one meeting, it is recommended that the service of two simultaneous interpreters is used, especially if the meeting will last more than 30 minutes, since interpreting back and forth between the two languages would create significant mental strain. Appropriate use of equipment will also need to be planned for such meetings, considering the use of channels or separate equipment for interpretation into Welsh and interpretation into English.
 - Usually, interpreters charge by the hour for the service, and for the time spent travelling to and from the meeting and setting up the equipment. You could ask the interpreter whether they charge a different rate for travel and setup time and whether other travel costs will be included in the quote. You should also check in advance whether the interpreter charges VAT. However, please note that the National Procurement Service's translation and interpretation framework agreement asks simultaneous interpreters to specify one price for the whole service.
 - Usually the interpreter will have their own equipment or will be able to arrange equipment hire on your behalf. You should agree hire terms in advance, including any conditions regarding compensation if headsets are damaged or go missing. If you use simultaneous interpretation services regularly, it could be useful for you to consider buying your own equipment, bearing in mind of course that there are costs attached to maintaining that equipment over time.

¹⁴ The only professional body currently offering membership for Welsh to English and English to Welsh simultaneous interpreters specifically is Cymdeithas Cyfieithwyr Cymru, the association of Welsh translators and interpreters.



- A Post-graduate Certificate in Simultaneous Interpretation has been developed by University of Wales Trinity St David in cooperation with Cymdeithas Cyfieithwyr Cymru. They are also in the process of developing a digital learning platform for the profession with grant aid from Welsh Government. This platform will include a series of videos in order for people to practice the art of simultaneous and consecutive interpretation in different contexts.¹⁵

The two methods: simultaneous interpretation and consecutive interpretation

- 10.3 There are two main methods of delivering interpretation services, namely simultaneous interpretation (or simultaneous translation) and consecutive interpretation (or consecutive translation).
- 10.4 Simultaneous interpretation is the usual method of providing interpretation services here in Wales. This interpretation is delivered almost *immediately* after the original is spoken – either by whispering or using special equipment – and this is the method usually employed at conferences and committee meetings. The simultaneous interpreter will provide a *verbatim* interpretation, imitating the tone, emphasis and emotion of the original speaker. This method of interpretation is well-established in Wales, and Cymdeithas Cyfieithwyr Cymru have two categories of simultaneous interpretation membership: simultaneous interpretation into English, and simultaneous interpretation into Welsh.
- 10.5 On the other hand, the examples of consecutive interpretation in formal Welsh language contexts are very rare.¹⁶ Cymdeithas Cyfieithwyr Cymru do not have a consecutive interpretation membership category, and simultaneous interpreters are not trained to work with this method.¹⁷ Techniques that are similar to consecutive interpretation are sometimes used in internal meetings or informal contexts where there is no professional interpreter or appropriate equipment available, i.e. an officer or colleague will usually summarize or explain a discussion for the benefit of those who do not understand Welsh. However, the arrival of the Welsh language standards has for the first time made people aware of this alternative method of translation¹⁸ where the interpreter provides an interpretation after the speaker has finished, often aided by notes.

¹⁵ <https://www.uwtsd.ac.uk/cy/cyfieithu-ar-y-pryd/> (available in Welsh only) (Accessed 12 February 2019).

¹⁶ This is a general trend internationally, and consecutive interpretation has become less common since the arrival of technology that enables simultaneous interpretation with equipment.

¹⁷ Nevertheless, the Welsh language has co-official status within the European Union. In order to facilitate this, simultaneous interpreters from Wales were given the opportunity to sit the European Commission's DG Interpreting exams. Those interpreters were required to pass a consecutive interpretation test as well as a simultaneous interpretation test. 15 individuals from Wales passed this test.

¹⁸ See standard 22A of the Welsh Language Standards (No. 7) Regulations 2018 for example: http://www.legislation.gov.uk/wsi/2018/441/pdfs/wsi_20180441_mi.pdf (Accessed 11 July 2018).

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- 10.6 It is a very different skill to simultaneous interpretation, since the interpreter needs to depend on their memory. Experienced consecutive interpreters with advanced note-taking skills can interpret speeches of up to 10 minutes or longer and can do so very accurately, but they clearly cannot repeat everything exactly as it was said.
- 10.7 It is also important to note that speakers who use a consecutive interpretation service need to develop specific skills and experience in using this method. The speaker must adapt their way of speaking, ensuring that they pause at an appropriate and reasonable juncture so that the interpreter can summarize. This can negatively affect the flow of a meeting and interrupt discussions at key moments.
- 10.8 Consecutive interpretation is mostly used to enable people who do not speak the language in which a service is being provided to receive a service in that language. For example, it is used in Wales, and other parts of the UK, to allow people who do not speak English to have access to public services. It is a model that is mainly used when the service user doesn't understand the language in which a service is being offered and when those offering the service do not understand the user's language. This is not the situation for most Welsh speakers who choose to use Welsh language services.
- 10.9 It could be argued that providing an interpretation service via consecutive interpretation can disadvantage the bilingual user since they will need to listen to everything twice. There is also the temptation for those who are completely fluent in both languages to respond immediately rather than wait for the consecutive interpretation, or to correct or make comments about the interpreter's interpretation of their own words. This can interrupt the flow and efficiency of a meeting.
- 10.10 It is also inevitable that consecutive interpretation includes an element of summarizing and interpreting, rather than translating everything verbatim. There is a risk of missing key details or a significant emphasis in the process.
- 10.11 The Welsh Language Commissioner is of the view, therefore, that simultaneous interpretation is the best way of providing first-class bilingual services and ensuring that the rights of Welsh speakers are respected in most contexts. The focus of the rest of this note will therefore be on simultaneous interpretation, but much of the principles can be applied to whichever method is used.

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- 10.12 However, the Commissioner recognises that there may be rare circumstances when consecutive interpretation would be more practical or appropriate for the user, for example cases where it would not be possible to transport or wear equipment for practical reasons or due to health and safety considerations. It is also possible that not every individual will be able to wear equipment due to a physical or mental condition or that wearing equipment could cause confusion or become an additional barrier for a young or vulnerable person.
- 10.13 However, the experience and training of professional interpreters in consecutive interpretation is limited, at best, and the Commissioner would like to see the translation profession in Wales addressing this alternative method of providing Welsh language services, developing appropriate training, qualifications, guidance and research into it.

The Commissioner is not of the view that the cost of hiring simultaneous interpretation equipment is sufficient justification for favouring the use of consecutive interpretation.



Interpretation from Welsh and into Welsh

- 10.14 The norm in Wales has mainly been to provide interpretation from Welsh to English, since people have worked under the general assumption that simultaneous interpretation is a service for people who do not understand Welsh.
- 10.15 There has been little demand for simultaneous interpretation into Welsh until recently, but that situation has changed fundamentally as a result of the requirements of the Welsh language standards. Standard 26 of the Welsh Language Standards (No. 1) Regulations 2015 states, for example:

If you invite an individual (“A”) to a meeting, and the meeting relates to the well-being of A, you must ask A whether A wishes to use the Welsh language at the meeting, and inform A that you will, if necessary, provide a translation service from Welsh to English and from English to Welsh for that purpose.¹⁹

10.16 As well as these specific standards that cover the requirement to provide simultaneous interpretation into Welsh in contexts involving someone's well-being, organisations have been considering whether providing interpretation into Welsh is an appropriate way of complying with a standard when there are no Welsh-speaking officers available, e.g. when providing a training course.

10.17 However, we should emphasise that providing simultaneous interpretation into Welsh is not expected of all organisations in all contexts, and that organisations will need to refer to their compliance notices and the relevant codes of practice to decide whether they are expected to do so or not.

10.18 Even if there was no legal requirement for them to do so, organisations could decide that providing simultaneous interpretation into Welsh is important for some audiences and contexts and is a natural step towards ensuring the status of the Welsh language in a country where it is an official language.

10.19 Times change, and the expectation is that we will see an increase in the demand for simultaneous interpretation into Welsh, as noted in the Welsh Language Tribunal's first determination on this very matter:

The standards under consideration do not reflect, necessarily, the demand which there has been in the past but set standards for the future, and that on the basis of need. The establishment of the new arrangement would lead, of course, to the creation of demand for the service.²⁰

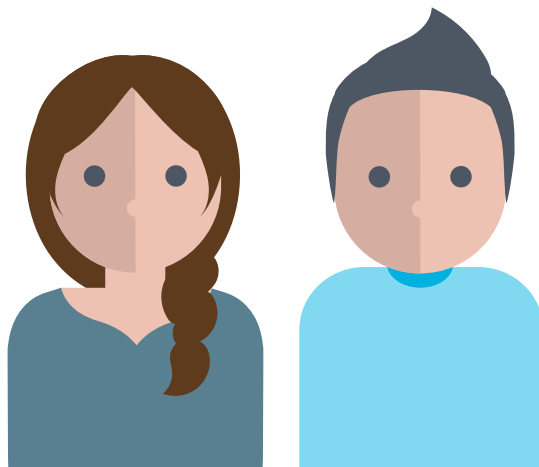
10.20 Responding to this increasing demand, the National Procurement Service has also included interpretation into Welsh for the first time in its framework agreement for procuring translation services for the public sector. The Commissioner wishes to see this area continuing to mature, and specific training for simultaneous interpretation into Welsh increasing in line with demand.

¹⁹ http://www.legislation.gov.uk/wsi/2015/996/pdfs/wsi_20150996_mi.pdf (Accessed 11 July 2018).

²⁰ Welsh Language Tribunal, Case TyG/WLT/165: <https://gov.wales/docs/wlt/170426-decision-pembs-county-council.pdf> (Accessed 11 July 2018).

Simultaneous interpretation into Welsh is a different skill to simultaneous interpretation into English, and it is important to check that the interpreter has relevant experience and qualifications. An interpreter's membership status with Cymdeithas Cyfieithwyr Cymru can be easily checked on their website, for example.

In situations where simultaneous interpretation both ways is required, two simultaneous interpreters should be arranged: one for each language, especially if a meeting will last more than 30 minutes. It would not be practically possible or fair to expect one individual to interpret both ways for an extended period. Having two interpreters would also provide the best and clearest outcome for the user.



Innovation in the courts: case study

- 10.21 Simultaneous interpretation from English to Welsh is not new in all contexts, and HM Courts and Tribunals Service has been innovative in this area by establishing a procedure for providing simultaneous interpretation from English to Welsh.
- 10.22 Section 22 of the Welsh Language Act 1993 gives any party to proceedings the right to speak Welsh in a court or tribunal hearing in Wales. As a result of implementing this right, it became apparent that more needed to be done to facilitate the experience of giving evidence in Welsh. Early experiences showed that witnesses who had chosen to give evidence in Welsh would tend to switch to English involuntarily if they were questioned in English. It was decided therefore to offer witnesses the opportunity to hear the English language questions being interpreted into Welsh.
- 10.23 To support this development, Cymdeithas Cyfieithwyr Cymru worked with HM Courts and Tribunals Service back in 2009 to develop a special examination process for interpreting from English to Welsh. By passing this exam, Cymdeithas Cyfieithwyr Cymru's simultaneous interpretation members can be recognised in an Area of Professional Expertise: Simultaneous interpretation in the Courts and Tribunals.

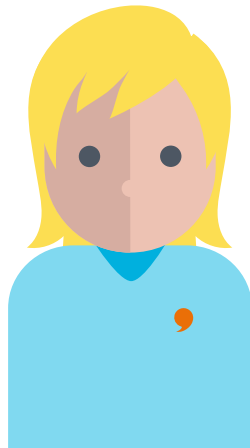
“ Over the years, the requirement to interpret from English to Welsh has increased, and it has been vital in ensuring that witnesses can continue to give their evidence in Welsh if they are questioned in English. Our experience is that this is extremely important for vulnerable witnesses who would otherwise have turned to English. ”

HM Courts and Tribunals Services



This is the view of a simultaneous interpreter who works regularly in the courts:

“ This is the only way that you can have a trial or hearing completely through the medium of Welsh from the perspective of a witness or appellant, and when you are in an emotional situation, being able to hear the questions in Welsh is a great help. ”



11 Holding bilingual meetings or events with the aid of simultaneous interpretation: practical advice



Public meetings (committee, event or conference)

11.1 The aim in a bilingual meeting is to enable people to use their language of choice, and to do so completely naturally and easily. An organisation should put procedures in place to ensure that all of the organisation's staff understand how they should determine whether a meeting should be bilingual, and how to arrange the services of a simultaneous interpreter to enable this to take place. Staff should be made aware of these procedures and their access to them made as seamless as possible. Some organisations will have specific duties under the standards regime, but the following procedures could help all organisations who wish to arrange effective bilingual meetings:

Planning considerations

- Before planning an agenda, consider the need for speakers who can make addresses in Welsh, and encourage them proactively to contribute in Welsh.
- Where appropriate, consider inviting a chair who speaks Welsh or a chair who is confident in facilitating a bilingual meeting. Consideration could be given to drawing up some brief guidelines to support chairs in holding a successful bilingual meeting. (There are practical suggestions [below](#) for points that should be included in such guidelines for meeting chairs and attendees).
- Ensure that every electronic presentation is bilingual – even if those who are presenting do not speak both languages.
- Ensure that you have information about the language choice of attendees as early as possible in the process of arranging the event, and give the information full consideration in drawing up the agenda and timetable. This information could impact the way you choose to arrange discussion groups, for example.



Arranging a simultaneous interpreter

- Ensure that you give enough warning when arranging a simultaneous interpreter. Indeed, it is wise to arrange the interpreter as soon as the meeting date is set in order to ensure availability.
- Explain to the simultaneous interpreter when arranging the service what type of meeting you are holding – public meeting, committee meeting, interview, disciplinary panel, seminar etc. You will also need to confirm in which direction interpretation is required – into English only, or into Welsh as well.
- Ensure that there is no conflict of interest, for example ensure that the simultaneous interpreter does not know those attending a job interview. This will avoid awkwardness on the day.



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- Ensure that the simultaneous interpreter receives all relevant documents for the meeting in advance, including background information and speaking notes where available.
 - When arranging a room, ensure that it is appropriate and of the right size, and that the acoustics are acceptable.
 - Plan and discuss with the interpreter in advance where they will sit. The interpreter should be given a place to sit in a location where they can see the speakers clearly and can lipread as necessary but where they will not affect the audience's enjoyment or draw too much attention to themselves.
 - If video conferencing equipment is to be used, the interpreter should be able to hear it clearly and see the screen in order to read the speakers' lips. If the screen is going to show an electronic presentation instead of the speaker's face, the presenter should be advised in advance to speak in a clear and unhurried manner since this will be more challenging for the simultaneous interpreter.
 - Also ensure there is space for the interpreter to set their papers and any necessary equipment in a convenient place. Providing the interpreter with water is also good practice.



Appropriate advertising

- Ensure that all correspondence involving the meeting is bilingual, including any temporary signage erected for the purposes of the meeting.
- State on meeting notices and the agenda that people may speak in either language, and that a simultaneous interpretation service will be available. You should also state in which direction the service is provided, i.e. simultaneous interpretation into Welsh or into English, or both.
- Try to find out in advance how many people will want to use the simultaneous interpretation service in order to ensure there is enough equipment available.
- Make use of the Iaith Gwaith (Working Welsh) logo when advertising the meeting in order to ensure that attendees are familiar with it.
- Circulate any relevant vocabulary or terminology in advance if the meeting will be discussing a subject that is not often discussed through the medium of Welsh.
- Distribute practical guidelines to meeting attendees to encourage them to contribute towards making it a successful bilingual meeting. (There are practical suggestions for points that should be included in any guidelines [below](#)).



Before the meeting

- Ensure there is enough time to install the simultaneous interpretation equipment before the meeting begins, that the equipment is clean and works, and that people can access the equipment easily.
- Arrange a quick chat with the interpreter to ensure they understand the nature of the meeting and the arrangements for the day, and to explain any last-minute agenda changes.
- Ensure the simultaneous interpreter has the opportunity to meet the meeting's chair so that the chair understands the interpreter's role in the meeting and can respond to any questions in advance.
- Brief Welsh-speaking officers in advance of the meeting and encourage them to contribute in Welsh and to bring the conversation back to Welsh where appropriate.



During the meeting

- Create an atmosphere in which it is very clear that contributions in Welsh are welcomed during the meeting by ensuring that Welsh is visible during the meeting itself, for example on signage or banners.
- Give the chair or interpreter an opportunity to explain how to use the equipment.
- Ensure that Welsh-speaking members of staff or volunteers are present in key places such as the welcome desk where relevant.
- Ensure that the public are aware which officers speak Welsh by using Iaith Gwaith (Working Welsh) materials or logos.
- Ensure that Welsh is heard during the event. Where possible, the chair can greet the audience bilingually and lead by example, continuing to use the Welsh language naturally so that a bilingual atmosphere is conveyed from the very beginning. Non-Welsh speaking chairs should be encouraged to greet the audience bilingually and to invite Welsh speakers to use the interpretation service.

Guidance for chairs



Chairs have a crucial role in ensuring that people feel confident using their language of choice during a meeting. A chair can chair in Welsh only should they wish to do so, and contribute towards ensuring that the meeting runs smoothly in two languages by following these steps:

- Taking a leading role and showing by example that it is natural for all Welsh speakers to speak Welsh and using as much Welsh as possible during the meeting.
- Encouraging and supporting discussion in both languages.
- Stating at the beginning and during the meeting that Welsh language contributions are welcomed.
- Explaining that people are welcome to respond in Welsh to any points or comments made in Welsh or English if they wish.
- Opening and closing every meeting in Welsh or bilingually.
- Introducing the simultaneous interpreter, explaining how the simultaneous interpretation will work at the beginning of the meeting, testing the equipment and ensuring that everyone has working equipment.
- Helping the interpreter by ensuring that everyone speaks in turn: you could emphasise at the beginning that attendees should refrain from talking across each other for the interpreter's sake.
- Turning the language of the meeting back to Welsh if the meeting has a tendency to stick to English following an English language question or contribution.
- Reminding attendees again that they can contribute in Welsh or English before any question and answer sessions. You could also remind those using the headsets that they may need to use the interpretation equipment once again during this part of the meeting.

Guidance for the attendees of bilingual meetings



- Remember that you are welcome to speak Welsh in the meeting and that equipment will be available to ensure that everyone understands you.
- Remember to provide a copy of electronic presentations or speeches in advance. Discuss with the organiser whether or not it is your responsibility to ensure your electronic presentation is bilingual.
- Remember that jargon, technical terms, jokes, poetry etc. are difficult to translate.
- Remember to pause to ensure that everyone has put their headsets on, or back on, before you speak.
- Remember to speak in a clear and unhurried manner and ensure where possible that the simultaneous interpreter can see your face as you speak. This is particularly true if you are reading aloud, since people have a tendency to speak much faster and to look down as they do so. This can be challenging for the simultaneous interpreter and for those listening to the original.

Video link meetings

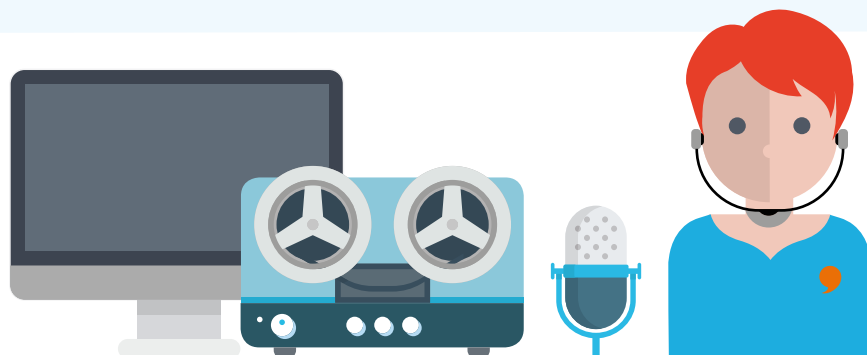
Case study on innovating through technology: Cartrefi Cymunedol Gwynedd



Traditionally, in order to be able to hold meetings bilingually, all of the board's members had to come together in one location where the interpreter and the equipment were located. This could be quite a challenge in such a large county, and became even more challenging as the company grew and started operating in other counties across north Wales. Our vision therefore was to ensure that meetings could take place completely bilingually via video without the need for an interpreter at each location.

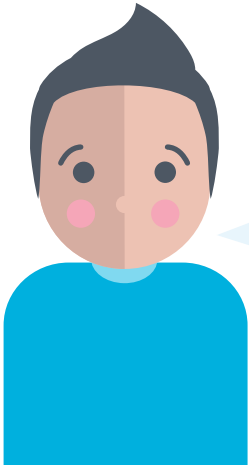
However, it became apparent that there was no easy solution, and no appropriate technology that would meet our requirements existed. Video conferencing systems only have one audio channel, and so we had to go about developing our own bilingual system. As our IT team worked with suppliers and experimented with technology, they found that an element could be added to the video conferencing system we were already using to enable people to choose to listen to a video meeting in Welsh or in English.

We can now hold any meeting across a number of sites using our original video conferencing solution, and all the users need to do is to use headsets and choose a language. This enables us to reduce travel time, be more proactive, reduce costs and operate more efficiently. We are very proud of the work achieved and see a huge potential for organisations and companies across the country to follow this example and ensure that equipment is available to facilitate the use of Welsh in the public, voluntary and private sectors. ”



12 Holding private or personal meetings with the aid of simultaneous interpretation

- 12.1 As already noted, organisations should ideally make the most of the language skills of their officers or staff to hold private or personal meetings in the individual's language of choice without needing to depend on an interpretation service. Indeed, some organisations will have specific duties to do so in accordance with their compliance notices. However, that is not always possible, especially when a meeting needs to include someone with specific expertise. There may be a need to hold such meetings with the aid of simultaneous interpretation if someone wants or needs to use the Welsh language during a meeting.
- 12.2 These can be private or personal meetings where the topic under discussion is sensitive or emotional, when personal information is to be revealed or discussed, or when the individual cannot understand or communicate effectively in a language other than their mother tongue (e.g. monolingual children or older people with dementia who have lost their grasp of a second language).
- 12.3 Such a meeting puts a simultaneous interpreter in a completely different situation to a public meeting, conference or committee. The interpreter's presence is much more conspicuous. For this reason, careful and advance consideration is needed for where the interpreter should sit: this will depend to some extent on the nature and purpose of the meeting and who is attending. Some organisations will have facilities for the simultaneous interpreter to sit outside the main meeting room and contribute to the meeting from a separate room with permanent equipment: this can be more practical and appropriate in some contexts.
- 12.4 In arranging a simultaneous interpreter for private or personal meetings, you should consider in advance whether the interpreter needs to have any expertise in a specific sector (e.g. health or justice) if the topics being discussed are technical or likely to include unfamiliar terminology.
- 12.5 As noted in [10.1](#), using an interpreter who is a member of a professional body is a way of ensuring that the interpreter is subject to a professional code of practice, which protects the interests of those taking part in the meeting.



It is vital to ensure in advance that the simultaneous interpreter does not have a personal interest in the meeting. This will avoid significant embarrassment, risk and awkwardness on the day of the meeting, which could lead to further delay if things needed to be re-arranged. Sufficient information should be shared with the simultaneous interpreter in advance of the meeting in order to check this, emphasising that information is confidential or sensitive when this is the case.

- 12.6 It is important to explain to everyone who will be present at the meeting what the role of the interpreter will be, making it clear that the interpreter respects confidentiality, is neutral and will not express any personal analysis or view. Organisations should consider developing a standard way of introducing the interpreter in such meetings. This can be particularly useful in meetings with young or vulnerable people who are not necessarily familiar with receiving an interpretation service. It is important to ensure that everyone understands that the interpreter will interpret every word without offering their view or advice, that the interpreter is a mediator and that comments or questions should not be referred to them directly.
- 12.7 It can be useful to meet with the interpreter in advance to brief them and to ensure they understand the nature of the meeting and what is expected of them. The interpreter will need to be pre-warned if it is likely that sensitive or difficult matters will arise that could cause distress or anxiety, for example. Organisations should be aware of the emotional strain that some cases could cause the simultaneous interpreter and consider practical methods of supporting the interpreter as a result – during and after the meeting.

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- 12.8 You could ask the simultaneous interpreter for guidance about the room's setup in advance and check that they are comfortable being placed in a specific place in the room. This is also an opportunity to discuss practical considerations, such as how the interpreter should draw a speaker's attention to encourage them to speak more slowly or repeat themselves if necessary. The simultaneous interpreter would usually speak in the third person in such a situation, e.g. 'the interpreter is struggling to hear the speaker'.
- 12.9 It is also a good idea to hold a debrief session with the interpreter following the meeting so they can note any ambiguity or errors made. It can be useful, for example, to ensure that the interpreter is happy that they have conveyed all messages correctly, but it would not be appropriate to ask the interpreter's opinion about the meeting's contents.
- 12.10 Where a meeting or appointment needs to be dealt with sensitively or where it would not be appropriate or effective to use simultaneous interpretation, consideration could be given to using the consecutive interpretation method. This type of interpretation can be more suitable for meetings with young children or older people, or when those attending the meeting are hard of hearing. See [10.3 – 10.13](#) for more considerations involving consecutive interpretation.

13 Simultaneous interpretation equipment



- 13.1 As already noted, most interpreters who offer a simultaneous interpretation service have their own equipment, but organisations can also hire or invest in their own equipment.²¹
- 13.2 If an organisation is considering investing in their own equipment, they should bear in mind that there will be costs related to equipment maintenance and that the equipment will need to be cleaned thoroughly after use.
- 13.3 Many types of simultaneous interpretation equipment are available, and your needs can be discussed with the providers when you hire or buy equipment. The systems used in Wales are mostly infrared or radio systems, and it is important to carefully plan the type of equipment to be used in a particular event in order to avoid practical difficulties on the day. Here are some considerations to keep in mind:
- You should be aware of what other audio equipment is being used in a location/room in order to ensure there won't be competing or conflicting signals. If an infrared system has been installed in a room to assist deaf or hard of hearing people, simultaneous interpretation equipment that also uses an infrared transmitter cannot be used. Using two infrared systems simultaneously can cause sound interference. Similarly, plasma screens emit infrared signals, and those signals can also conflict with infrared systems.
 - You will need to consider using several different sets of equipment where there are several discussion groups. Infrared signals cannot penetrate solid walls, and so more than one set of infrared equipment could be used if the discussion groups were separated into different rooms. However, holding two workshops in different areas of one large room would not allow the use of two sets of infrared equipment since the signals could not be separated. There is no difficulty in using infrared and radio equipment side by side, or in using more than one channel on radio equipment, assuming that more than one transmitter is available for interpreters to link into the various channels.
 - Some types of simultaneous interpretation equipment are more suitable than others if the content to be interpreted is sensitive or confidential. Simultaneous interpretation equipment using infrared or digital radio systems are more secure than analogue radio equipment, for example. In a situation where you would need to provide simultaneous interpretation for more than one meeting at the same location at the same time, you can stop people from receiving a translation from another room by:

²¹ A list of the organisations offering to hire out simultaneous interpretation equipment is available on the Cymdeithas Cyfieithwyr Cymru website: <https://www.cyfieithwyr.cymru/en/interpretation/interpretation-systems-database> (Accessed 25 July 2018).

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- Using infrared systems in each room.
 - Using a digital radio system in each room and locking the channels on the receivers so that nobody can change channels. Note that radio signals do penetrate walls and the distance can vary by system.
 - Using an infrared system in one room and a radio system in another. The infrared receivers would not be able to receive the radio signal.

Systems to assist deaf and hard of hearing people

- 13.4 Ensure that you ask attendees before any event or meeting whether those who wear hearing aids will need an induction loop. Hearing aids can vary significantly, and not all systems are compatible with each other. When an interpretation service is being used, you will need to check whether the system being used will be radio or infrared, and provide neck loops or other appropriate equipment that is compatible with the hearing aids where possible. Some users will have their own systems.
- 13.5 Some locations/rooms will have their own permanent internal systems installed to assist deaf and hard of hearing people, for example a magnetic induction loop system or an infrared system that links to hearing aids. It is important therefore to gather as much information as possible about the location's facilities, and to do so at an early stage of arranging the event.
- 13.6 If a permanent infrared system has been installed in a meeting room, it is likely that the system will have only one channel, which will be used to link with hearing aids. Note that infrared systems with more than one channel are available, and these are sometimes seen in larger venues, such as theatres. If such a venue is used, you should ask how the channels on the infrared system are used in that venue. It may be possible to explore the possibility of using one channel for the hearing aids of those who do not need a translation, and another to stream the translation. In doing so, you would need to ensure that there are enough receivers available that can link to the translation's channel.
- 13.7 Careful planning will be necessary in a situation where you will have attendees who wear hearing aids but do not wish to hear the interpretation. If you are using a room where a magnetic induction loop system has been installed around the room, note that it is unlikely that a neck induction loop will work alongside that system. This would stop anyone who is wearing a hearing aid from hearing the interpretation.

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- 13.8 In such a situation, you could consider using a room with an infrared system installed along with appropriate receivers and neck loops to provide for those who do not wish to hear an interpretation and radio equipment with neck loops for those who wish to receive an interpretation through the hearing aid. Depending on the nature of the event, it would also be possible to explore the possibility of using a room without a permanent system installed for deaf or hard of hearing people, and using different channels on radio equipment, or more than one radio system. The radio equipment would provide for those who do not wish to receive an interpretation and those who wish to use the interpretation service, and everyone wearing a hearing aid would need neck loops. You would need to give clear directions about which channels or which receivers to use for both purposes.
- 13.9 Note that making these arrangements are not the simultaneous interpreter's responsibility, but you do need to discuss your needs when engaging the services of an interpreter.

