Advice Document: Bilingual Drafting, Translation and Interpretation
Background

The principal aim of the Welsh Language Commissioner, an independent body established under the Welsh Language Measure (Wales) 2011, is to promote and facilitate the use of Welsh. This entails raising awareness of the official status of the Welsh language in Wales and imposing standards on organizations. 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

Contact Details:

- Tel: 0845 6033 221
- Email: post@welshlanguagecommissioner.org
- Website: welshlanguagecommissioner.org

Welsh Language Commissioner
Market Chambers
5-7 St Mary Street
Cardiff CF10 1AT
## Contents

1 Introduction 1
   The legislative context 1
   The Welsh Language Commissioner’s Advice Documents 1
   Translation, interpretation: some context 1

2 Text Translation 3
   Preparing text for translation 3
   Sending text to be translated – to a company or a private individual 4
   Using an internal translator 4
   Work returned from the translator 5
   Some other issues to consider 5

3 Technology and Text Translation 6
   Translation memory software 6
   The translator and translation memory software 7

4 Commissioning translation 8
   Translation project management software 8
   Spellchecking and terminology 9
   Automatic translation software 9

5 Bilingual meetings with the aid of simultaneous translation 11
   Advice for chairpersons 11
   Guidelines for those attending meetings 12

6 Writing in Welsh/bilingual drafting 13
   Automatic translation in the bilingual office 13
1 Introduction

The legislative context

The Welsh Language (Wales) Measure 2011 ("The Measure") sets a new legal context for the Welsh language. After the Measure received Royal Assent in February 2011, official status was established for the Welsh language in Wales, as well as the general principle that the Welsh language should be no less favourably treated than the English language in Wales. The Measure creates a new legislative framework for enforcing duties on persons operating in Wales with regard to the Welsh language, and in due course, will replace many of the provisions of the Welsh Language Act 1993 ("WLA 1993").

Section 2 of the Measure establishes the Welsh Language Commissioner ("the Commissioner") to implement this new legislative framework. The Commissioner is independent and has responsibility for enforcing legal duties on persons via ‘standards’ detailed in Part 4 of the Measure. These standards are enforceable by the provisions of Part 5 of the Measure. To aid organizations’ future implementation of such standards, standards codes of practice will be produced. The legal procedure underpinning the standards will be developed over the next few years.

Many of the public organizations which will be subject to standards currently operate Welsh Language Schemes under the WLA 1993. When the Welsh Language Board was abolished at the end of March 2012, its duties in relation to Welsh Language Schemes were transferred to the Welsh Language Commissioner. Each organization will still be obliged to comply with its Welsh Language Scheme, as approved under the WLA 1993 until such a time as that organization becomes subject to standards under the Measure.

The Welsh Language Commissioner’s Advice Documents

For the period until standards are in force and statutory codes of practice are in place, the Commissioner has published a series of advice documents, to assist any organization or individual to offer bilingual provision.

For organizations implementing schemes under the legislative framework of the Welsh Language Act 1993, these advice documents will assist compliance and build upon the statutory guidance published by the former Welsh Language Board (under Section 9 of the Welsh Language Act).

For other organizations, the advice documents will assist in the provision of bilingual services and operations in a context where the Welsh language has official status in Wales.

Translation, interpretation: some context

The following scenarios are envisaged as means of providing an organization’s translation and interpretation services:

- Organizations have internal units that provide the services
- Organizations procure work from external businesses
- Organizations use a combination of internal translators/interpreters and
Organizations within a sector share the translation/interpretation work, e.g. through service-level agreements or one centre providing for the whole sector.

This advice document will therefore be relevant for those who are responsible for planning the provision of translation and interpretation. Specifically, the document deals with the following matters:

- Arrangements for providing translation and interpretation in an organization
- How Information Technology can help translators
- Advice on planning bilingual meetings where there is a need for an interpreter to facilitate the meeting
- Drafting bilingual documents

Not all elements of this advice document will be relevant to all organizations but it does include advice about the type of things that could be done by different organizations to facilitate their work in these fields. Although some sections may be useful for translators, it is not intended solely for translators, but rather for those who are responsible for arranging or procuring translation and interpretation services.
2 Text Translation

2.1 Procedures should be in place to enable organizations to provide texts in a manner that ensures that the Welsh language is treated no less favourably than the English language, in accordance with the legal obligations placed on them.

2.2 All the organization's staff should be aware of which documentation should be bilingual and of the organization’s procedures to enable this.

2.3 How each organization sets about translating documents to and from English and Welsh is a matter for the organization itself. Some organizations will employ translators as members of staff and others will contract private companies to do so. Other organizations will use a combination of internal translators and private translators or will share the work amongst other similar organizations in their field in order to meet their own translation needs.

2.4 Qualified translators should always be used to translate text. Appropriate software is available to aid the work of translators but it should never be used instead of a professional translator. Human translators must be involved in the translation of a document; machines cannot replace a professional translator. Automatic translation software should not be used via a web link to provide a Welsh version of a website or other documents published by your organization. This would mean that the Welsh and English languages are not treated equally.

Preparing text for translation

2.5 The procedures put in place by organizations for translating text should raise the awareness of staff of the following matters:

- The need to ensure that there is sufficient time for translating and proofreading especially if there is a need to design the document. When drawing up the timetable for translating text, sufficient time must be ensured for proofreading the text in question in both languages;
- The final version of the text should be provided to the translator rather than a series of drafts that could complicate the translation process and increase costs;
- It should be remembered when drafting a text, that it is not always possible to translate idioms and sayings successfully. Some cultural metaphors may also be unsuitable. If you have to use them, it would be a good idea to discuss this intention with the translator at the beginning of the project;
- It should be remembered that it is possible to draft text bilingually in the first place. Often when doing so the work will be written better in both languages;
- The translator should be provided with clear instructions, e.g. links to documents or websites which are quoted, specific terms that should be used;
- A glossary of words which are relevant to the organization could be prepared;
- Some types of translation work are specialized, such as legal translation, and translators with expertise in the field in question should be used;
- Often, translation can improve the original work, as the translator can draw
attention to difficulties or ambiguities in the original text. A good working relationship with a translator can aid this. A translator could be thought of as a fresh pair of eyes looking at the work.

Sending text to be translated – to a company or a private individual

2.6 How work is translated depends on the establishment’s procedures. However, if you intend to use a private translator the following matters should be considered when contracting, either through a formal procurement process or by commissioning translation as and when it is needed:

- Determine that certain staff member(s) are responsible for the establishment's translation service. They will record the details of the work, such as the number of words and the timetable for completing the work. This will facilitate sending the work to be translated, and will avoid complications. By keeping a record of the work it will also be possible to avoid repeating the translation of similar pieces of text as a record exists of what has already been translated;
- Set up a good working relationship with one or more translators. This can be done by contacting translators as and when it is needed or through a formal procurement process, such as a call-off contract;
- Using a qualified translator. If you use a translation agency, you should also ensure that the work is translated by a qualified translator;
- Those procuring translation services should also ensure that the translator has indemnity insurance. Indemnity insurance ensures the rights of the customer and shows the professional attitude of the translator when dealing with clients;
- Ensuring that the organization commissioning work has internal procedures to ensure that the work undertaken is of the best quality;
- Ensuring that the translator has quality assurance procedures in place also;
- Ensuring that the company has a complaints procedure in place to deal with complaints about the quality of translation;
- Translators tend to charge per thousand words and most have a minimum number of words that they charge for translating. Some will charge according to the number of words to be translated (in the original language) and others according to the number of words in the translated document. Many translators charge VAT. The price should be agreed before work commences.
- Consider whether you want the company to use translation memory software when translating. See Section 3.

Using an internal translator

2.7 Your organization may have an internal translation unit, or one centre will be responsible for translating work for your field. Each unit or centre will be run differently, but the following matters should be considered when running such a service:

- Ensuring that there is a way of processing the translation work which includes receiving, recording, prioritizing, translating and returning translated text;
That the translation staff is qualified for the work – the fact that somebody is bilingual does not mean that they can translate;

Ensuring that there is appropriate software to facilitate the work of the translator including word processing software, translation memory software, translation work flow software, spell-checking and grammar-checking software, links to databases of appropriate terminology. See Section 3;

Ensuring that translators have the appropriate reference books to help them with their work;

Ensuring that appropriate training is available to staff to enable them to translate to a high standard, and so that they are aware of new developments in the field.

Work returned from the translator

2.8 All text that has been translated should be revised before it is published. Procedures should be in place to ensure that Welsh text is proofread in exactly the same way as English text or text in other languages would be read. It must be ensured that Welsh and English texts that are published are treated in the same way.

Every piece of translated text should be verified before it is made public;

All text that is designed in Welsh and English should be checked either by officers or by external contractors;

From time to time, depending on the software that is used, Welsh diacritic marks (accents) do not transfer properly when designing documents, posters, signs etc. Particular attention should be given to this matter;

Some translators will offer a document proofreading service. However, it is recommended that you ask a different translator or proofreader for their opinion as the original translator could be too familiar with the work.

Some other issues to consider

2.9 If an organization works in a particular field of work, it would be useful for it to set up a joint translation contract with other organizations in the same field or appoint one centre to be responsible for translation for that specific field. This can ensure consistency of terminology within the field and can also lead to savings when commissioning translation work jointly.

2.10 It is a good idea to create a style guide so that internal drafters of documents, internal and external translators keep to these guidelines when drafting documents in Welsh or when translating. It will be easier to control the quality of the translation work that is commissioned with guidelines of this type.

2.11 If a public sector organization decides to use translation memory software it could publish the translation memory in order to facilitate the translation work of other organizations.
3 Technology and Text Translation

3.1 Language technology can help to accelerate and facilitate the work of the translator. It can also assist organizations who commission work to ensure the quality of translation work commissioned and to ensure value for money.

Translation memory software

3.2 Translation memory software keeps a record of what has already been translated using the software. When a new document is translated using the software the software will search its memory for components that can be used to translate the new piece of translation. These components include terms or complete phrases. This can help the translator in several ways:

- There is no need to retranslate text that has already been translated
- It leads to consistency in style and terminology
- It can allow translators to translate more words in less time

It must be ensured that translations loaded into the software should be of a high standard in order to increase the likelihood that translations offered by the software are of a high quality. By using the software the translator will then gradually refine the contents of the memory.

3.3 Translation memory software analyzes how much of the content of the new document matches the contents of the translation memory. Here is an example of an analysis:

<table>
<thead>
<tr>
<th>Percentage match</th>
<th>Number of words</th>
<th>Percentage of total number of words %</th>
</tr>
</thead>
<tbody>
<tr>
<td>Repetition within the document</td>
<td>277</td>
<td>6</td>
</tr>
<tr>
<td>100%</td>
<td>924</td>
<td>20</td>
</tr>
<tr>
<td>95% - 99%</td>
<td>693</td>
<td>15</td>
</tr>
<tr>
<td>85% - 94%</td>
<td>370</td>
<td>8</td>
</tr>
<tr>
<td>75% - 84%</td>
<td>462</td>
<td>10</td>
</tr>
<tr>
<td>50% - 74%</td>
<td>92</td>
<td>2</td>
</tr>
<tr>
<td>No match</td>
<td>1802</td>
<td>39</td>
</tr>
<tr>
<td>Total</td>
<td>4620</td>
<td>100</td>
</tr>
</tbody>
</table>

- 6% of the words in the new document are repeated. There may be no need to translate them again but they will certainly need to be edited.
- 20% of the words in the new document are in sentences that are exactly the
same as the sentences in the memory. There may be no need to translate them again but they will certainly need to be edited.

- 35% of the words in the new document are in sentences where there is some correspondence between what can be found in the memory and what can be found in the new document. These sentences need to be checked, edited and refined.
- 39% of the words in the new document are in sentences that are not similar at all to what can be found in the memory. These sentences need to be translated from scratch.

**The translator and translation memory software**

3.4 Translation memory software can improve the efficiency and increase the profit of private translators as they will be able to translate more words in the same amount of time. An internal translation unit in a public organization can translate more words in the same amount of time allowing the unit to deal with more translation work or to use their resources in alternative ways, such as by assisting others to draft their work in Welsh in the workplace.

3.5 It may also be of benefit to larger translation units and companies, as some types of software allow individuals in different offices and organizations to use the same software and work on the same document at the same time.
4 Commissioning translation

4.1 Not all organizations have translation units, and even if they do have internal translation units, often they will need to turn to external providers to meet their translation needs. If an organization decides to set an external contract by means of a procurement process the following could be done:

- Make it obligatory in the contract for providers to use translation memory software;
- Ask the provider to create a translation memory for use specifically in translating work for the organization;
- Make it a requirement that the new translation is paid for in accordance with the amount of correspondence between the composition of the new document and the contents of that memory (please see 3.3). This could lead to savings for the organization commissioning the work;
- Make it a contractual requirement that it is the commissioning organization that owns the translation memory. This translation memory could be used again if the organization procures translation work in future from another provider;
- Create its own internal translation memory with appropriate software and share relevant components of that memory with the provider. The translator will use the relevant components of that memory when translating. After completing the work the organization could ask for the memory, as well as the translation, in order to update the organization’s translation memory.

4.2 When commissioning translation work the translator could be paid different rates depending on the percentage of match between the text that is to be translated and the contents of the memory. Using case study 1, a percentage only of the usual cost per thousand words could be paid to translate or edit the parts of the document that fully match (100%) the contents of the memory. It is imperative that these components which fully match are checked. A higher percentage of the usual cost per thousand words could be paid for those components that partly match (50–99%). For those components that need to be completely translated again the usual cost could be paid.

4.3 It should be remembered, of course, that some documents, such as annual reports, are more repetitive than others and that savings will become evident with the annual cycle of different documents.

Translation project management software

4.4 Translation project management software is also available. Depending on the software it enables people, from one central point, to apply for a translation, to set timetables and to manage the translation workflow. It can share work amongst translators and even deal with billing matters also. It might be worthwhile investing in this type of software if your organization does and/or commissions a lot of translation work.
Spellchecking and terminology

4.5 An important aspect of ensuring the quality of an organization's bilingual documents is ensuring that the terminology used in them is consistent and correct. This will also reflect well on the organization’s image. It would be possible to draw up a list of terms that an organization uses, or ask a translation provider to do so on behalf of the organization. The terms could be shared with the translation providers to be used by them when translating. Translators can also compile lists of terms within translation memory software. They could also be asked to upload the terminology lists into their translation memory software to ensure that they are used when translating for your organization.

4.6 Lists of standardized terms are available on the following websites:

- Porth Termau Cenedlaethol Cymru (National Terminology Portal)
- TermCymru: these are terms that translators from the Welsh Government use in their work
- Microsoft Terminology: these are the terms that Microsoft uses in the localization of Welsh language software
- The CysGair terminology package is available within the Cysgliad software pack that includes the spelling and grammar checker CySill too. They are also available in the Porth Termau listed above. For more information please see the Cysgliad website.
- The Welsh Academy English-Welsh Dictionary is also available on-line.

4.7 It is vital that translators, and all who publish documents in the name of an organization, check the spelling and grammar of those documents. Microsoft Office software, if a Welsh Interface Pack has been installed on them (more information can be found on the Commissioner's website), can be programmed to spell-check documents written in Welsh. CySill software which is part of the Cysgliad package (which includes the CysGair English/Welsh terminology dictionary also) can be used to check grammar and spelling. Cysgliad is available for use on a PC, and is available free for Mac. You can also verify documents in CySill on the web on the CySill online website.

You should ensure that checking the language of documents is an integral part of the translation processes of organizations as well as those of external translation contractors. This should be a contractual requirement.

Automatic translation software

4.8 Another type of software that can support the work of translators is automatic translation software or machine translation. Automatic translation software will offer translations for the translator that are based on an analysis of a language corpus and/or on the basis of its grammatical rules.

4.9 Automatic translation can be helpful to translators by providing a ‘gist’ translation of documents for them. It is used for this purpose by the European Commission's translation service, for example when they begin translating a piece of text. It can help the translator in the same manner as translation memory software, as it is a ready source of translation that the translator edits. It is possible to use some types of machine translation plugged into translation memory software in order to take

---

advantage of the contents of the translation memory and the automatic translation at the same time.

4.10 The standard of the translation provided by automatic translation software varies, and translation done by automatic translation software cannot be considered as a standard and accurate translation. Automatic translations must be edited before they can be published. People must be involved in the translation of a document; a machine cannot replace a professional translator.

4.11 Links to web-based automatic translation software should not be used to provide the Welsh medium version of a website or other publication because it is not possible to depend on the results of the automatic translation. This would contravene the principle that the Welsh language should be treated no less favourably than the English language.
5 Bilingual meetings with the aid of simultaneous translation

5.1 The aim in a bilingual meeting is to enable people to use their language of choice and for them to do so freely and naturally. Organizations should set out procedures that ensure that all of the organization’s staff know how to go about deciding whether a meeting should be bilingual, and how to arrange the services of an interpreter to ensure that the meeting is bilingual. Staff should be made aware of these procedures and they should be easily accessible to them. The procedures should consider the following:

- Ensuring that all communication in relation with the meeting is bilingual, including those that are only temporary for the purposes of the meeting;
- Announcing on advertisements and on the agenda of meetings that it will be possible to speak in either language, and that interpretation facilities will be available;
- Ensuring that the interpreter receives documentation relevant to the meeting beforehand;
- Circulating glossaries and relevant terminology if the meeting deals with a field that is not usually discussed in Welsh;
- Remembering that the interpretation service is provided for those who do not speak Welsh. Interpretation is not often offered from English to Welsh, although this can happen in some circumstances;
- Explaining to the interpreter when arranging the service what type of meeting will be held, such as a public meeting, a committee meeting, interview, seminar, meeting of a voluntary organization. This will make it easier for the interpreter to decide whether to undertake the work or not;
- Ensuring that there is sufficient time to set up the interpretation facilities before the meeting and that people have easy access to them;
- Ensuring that the room where the meeting is held is appropriate and of the right size, and that the acoustics is acceptable;
- How to ensure that the bilingual meeting flows naturally when moving from one language to another.

Advice for chairpersons

5.2 Specific advice could be given to the chairpersons of meetings to draw attention to the importance of their contribution to ensuring that people can use their language of choice. Chairpersons can show that it is natural for all Welsh speakers to speak Welsh and that the meeting can run successfully bilingually. The chairperson can do the following:

- Encourage and support discussion in both languages;
- Welcome contributions in Welsh at the beginning and during the meeting;
- Open and close all meetings in Welsh or bilingually;
- Introduce the interpreter, explain the process of interpretation at the beginning of the meeting, test the equipment and ensure that all the equipment is working;
Help the interpreter by ensuring that everybody speaks in turn;
Use as much Welsh as possible during the meeting;
Turn the language of Welsh speakers in the meeting back to Welsh if the language tends to remain English following a contribution in English;
It is possible for the chairperson to respond in Welsh to points or comments made in Welsh or English;
It is possible for chairpersons to chair only in Welsh if they wish to do so as there are interpretation facilities available to facilitate that. This gives confidence to other Welsh speakers to speak Welsh in the meeting;
Do everything possible to ensure that the bilingual meeting flows naturally when moving from one language to the other.

Guidelines for those attending meetings

5.3 It would be possible to create guidelines for those attending meetings so that they consider their contribution to enabling a bilingual meeting. The guidelines could contain the following matters:

- The need for them to provide a copy of any speech that they give to the interpreter beforehand;
- A reminder that it may be difficult to interpret jargon, terminology, figures and poetry etc.;
- Underline that they can speak Welsh in the meeting and that equipment is available to ensure that everybody understands.
6 Writing in Welsh/bilingual drafting

6.1 There are tools available to help people to write Welsh correctly and to draft documents bilingually. It should be ensured that staff can use these tools and that they receive the appropriate support and training to help them make the most of their linguistic skills. This means that organizations do not need to rely on translating all documentation in order to provide a bilingual service, and that full use is made of their language skills. Drafting texts bilingually can also improve the quality of the final work.

6.2 To help staff draft bilingual documentation and to write in Welsh, the organization should ensure that members of staff can do the following:

- Use the Welsh interface of software that is available in Welsh;
- Know how to tag the language of a document as Welsh;
- Have access to dictionaries and reference books that offer language support, including help with grammar (see 4.5 and 4.6 above). Also, know how to look for information in these reference books;
- Use grammar and spellcheck software such as Cysill (see 4.7 above);
- That there are arrangements in place to check the written work of staff if needed, so that they become more confident when writing.

Automatic translation in the bilingual office

6.3 Automatic translation software can help people who do not understand the language to get a rough idea of the contents of a document or e-mail. This would be of great assistance in a bilingual workplace where individuals may wish to work in Welsh but their colleagues don’t understand the language. For example, a non-Welsh speaking employee could get a gist understanding of the content of a document or e-mail written by another colleague without the need for those drafting the original to translate everything. It should be emphasized that this is a mere gist translation of course, and that organizations would need to ensure that they have appropriate internal procedures in place before using the software in this way, because the software cannot be depended on to provide an accurate translation.

6.4 In workplaces where staff draft bilingual documents as part of their work, automatic translation software can also be of help by creating rough translations of documents that they have written. Those using the software would have to understand its limitations and adapt the translation for correctness. Once again, an organization must ensure it has appropriate internal procedures in place before using the software in this manner.