

Translation as inclusion? An analysis of international NGOs' translation policy documents

Abstract (English)

International NGOs (INGOs) are important agents in delivering the UN's sustainable development agenda, but their linguistic practices have received little attention in the field of language policy and planning. This article aims to add new insights to the field by exploring the link between INGOs' organisational value of inclusiveness and their institutional approaches to translation. It does so through a case study of Oxfam GB's and Tearfund's translation policy documents. The analysis reveals that the policy documents focus on written translation into a handful of lingua francas. In other words, they largely overlook the need for interpreting and translation from and into local languages. In addition, the policy documents do not make any overt links between principles of (linguistic) inclusiveness and the need for translation. The article summarises the advantages and drawbacks of creating a translation policy, and provides guidance on linking translation policy more overtly to values of inclusiveness.

Abstract (French)

Les ONG internationales (ONGI) sont des agents importants dans la mise en œuvre du programme de développement durable de l'ONU, mais leurs pratiques linguistiques ont reçu peu d'attention dans le domaine de la politique et planification linguistique. Cet article vise à ajouter des nouvelles perspectives dans le domaine en explorant le lien entre les valeurs d'inclusivité des ONGI et leurs approches institutionnelles de la traduction. L'article présente une étude de cas des documents de politique de traduction d'Oxfam GB et de Tearfund. L'analyse révèle que les documents de politique se concentrent sur la traduction écrite dans une poignée de lingua francas. En d'autres termes, ils négligent largement le besoin d'interprétation et de traduction depuis et vers les langues locales. De plus, les documents de politique ne font aucun lien manifeste entre les principes d'inclusion (linguistique) et le besoin de traduction. Pour conclure, l'article résume les avantages et les inconvénients de la création d'une politique de traduction et fournit des conseils sur la manière de lier plus ouvertement la politique de traduction aux valeurs d'inclusivité.

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In his publication on the missing link between language policy and the United Nations' development agenda, Mark Fettes (2015) argued that if the field of language policy and planning (LPP) 'is to take the equality challenge seriously', research needs to shift from theoretical discussions to addressing 'the practical challenges of linguistic inclusion in modern multicultural societies'. Fettes (2015) argued that while scholars have conducted various case studies on official language policy in UN institutions (Borjian 2014; Corrêa d'Almeida and Otcu-Grillman 2013; Duchêne 2008; Fettes 2015; McEntee-Atalianis 2006, 2016, 2017; Tonkin 2015), there was little sustained analysis and critique of how language was addressed (or not) at the UN, particularly in the context of its sustainable development agenda. This gap has gradually started to be addressed by critiques from scholars who have expressed concerns about the United Nations global goals' lack of explicit engagement with the role of language in achieving sustainable development (Bamgbose 2014; Fettes 2015; Marinotti 2017; McEntee-Atalianis 2017; Romaine 2013; Tonkin 2015). However, much work remains to be done. For example, littl

e has been said in LPP so far on language and translation policy in international NGOs (INGOs), which are key actors in delivering the UN's Sustainable Development Goals (SDGs). Because of their close involvement in delivering the SDGs, INGOs' approaches to working multilingually have a direct impact on aims of creating inclusive societies.

In recent years, issues of language and translation in the work of INGOs have started to be raised in various humanities disciplines, such as disaster management, development studies, sociolinguistics and translation studies (Codó and Garrido 2010; Footitt, Crack, and Tesseur 2020; Garrido 2017; Kahn and Heller 2006; O'Brien et al. 2018; O'Brien and Federici 2019; Roth 2019; Tesseur 2018). Research has found that INGOs often do not plan for language and translation needs in their international development and humanitarian operations, and that they tend to opt for ad-hoc translation solutions in which multilingual

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staff or volunteers often act as translators or interpreters to ensure successful communication between NGO staff and local communities (Federici et al. 2019; Footitt et al. 2020). Research has also shown that although individual NGO workers, especially those active on the ground, recognise the critical role of translation in their work, international interventions often lack formal processes and strategies that ensure linguistic inclusiveness (ibid). Some staff working in the sector have asked if in order to address this gap NGOs need language and translation policies, and if so, what such policies could or should look like (Crack 2014).

Aiming to formulate a response to these questions, the current article takes necessity and feasibility of language provision as its starting point and explores translation policy in INGOs, who, as non-profit organisations, usually have limited resources for language provision at their disposal. Resource limitations and the necessity to deliver specific project objectives to donors can make it challenging for INGOs to organise and pay for multilingual work, many of which use English as a lingua franca in their international work. However, INGOs are led by values and aims of inclusiveness, as represented in humanitarian standards such as the Core Humanitarian Standard (CHS Alliance, Group URD, and Sphere Project 2014) and the vision of 'leaving no one behind' expressed in the SDGs (United Nations 2015). These standards and the principle of inclusiveness aim to ensure that INGOs' services are accessible and culturally appropriate, by for example ensuring that dialogue takes place with grassroots communities when developing INGO programmes. This article explores if INGOs' individual written translation policies (can) link aspirations of inclusiveness to language provision. Previous research has indicated that the existence of written language and translation policies in INGOs is limited. However, some of the largest organisations do have them, such as in Amnesty International, Greenpeace, the International Red Cross, Oxfam GB, Save the Children, and Tearfund (Crack 2014; Footitt et al. 2020; Garrido 2017; Tesseur 2014). Little has been revealed so far, however, on how the contents of INGOs'

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written language and translation policy documents relate to INGOs' organisational value of inclusiveness.

The article aims to contribute to the field of LPP in two ways. Firstly, it offers insights into how INGOs, as powerful global organisations that the field of LPP has not yet fully engaged with, regulate their multilingual work by using institutional policies. Secondly, the article aims to offer insights to the INGO sector itself on the potential usefulness and effectiveness of written policies. Thus, as suggested by Grin (2019: 5), the article offers to inform the 'democratic debate' that may take place in INGOs among staff and management on the usefulness and the implications of language and translation policy.

Analytical framework and data

The article analyses the formal, written translation policy documents of two international NGOs, i.e. Oxfam GB and Tearfund. The interview data and policy documents that this article draw on indicate that neither organisation currently has a written language policy document, but both have a written translation policy. Yet translation policies are not stand-alone policies: as argued by Meylaerts and González Núñez (2018: 196), choices about language automatically entail choices about translation. As the analysis will show, both policies include statements on organisational working languages, and so analysis of these documents will shed light on (a) what choices INGOs make about institutional multilingualism, and (b) how INGOs regulate translation, which has an impact on exclusion or inclusion of communities and staff in the key activities of INGOs (Meylaerts and González Núñez 2018).

Following Meylaerts and González Núñez (2018), translation policy is conceptualised in this article in accordance with Spolsky's (2004) definition of language policy as the

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combination of language management (written documents), language practices (what people actually do), and language beliefs or ideology. As Spolsky (2004) argues, efforts of language management, like the policy documents under analysis here, may not necessarily have the desired effect. Only looking at policy documents does not give insight into how a policy is (or is not) implemented, and what the motivations were for creating the policy in the first place. To partly address these gaps, the current article provides some background information on the organisational context in which the translation policies were created. However, because of space limitations, analysing actual language practices is beyond the remit of this article, and the discussion here focuses primarily on written policy documents. The analysis is built around three key research questions.

- 1) What do the policy documents try to regulate?
- 2) What organisational circumstances led to the creation of these policies?
- 3) (How) can these policies contribute to the organisational values of these organisations, particularly aspirations of inclusiveness?

The two policy documents under analysis are the written translation policies from Oxfam GB (last updated in January 2021) and Tearfund (2011). These policy documents were obtained through the UK-based internal translation services of these organisations. Fourteen semi-structured interviews with current and former staff of these INGOs serve as complementary data that provide information on the history of the two policies and their (intended) effects. A breakdown of the interview data is provided in Table 1.

Table 1. Interview breakdown

Oxfam GB	Tearfund
Current staff: 3	Current staff: 6
Former staff: 2	Former staff: 3
Total: 5	Total: 9

Interviews were conducted between January 2016 and December 2020 as part of two research projects on the role of languages and translation in the work of international NGOs ('The Listening Zones of NGOs'¹ and 'Translation as Empowerment'²). Ethical approval for these studies was obtained from the ethics committees of the universities involved. The interview data drawn on in this article consists of interviews with staff based in the UK offices and who worked in a variety of job roles, such as communications and translation, desk officers who supported in-country colleagues in specific country programmes, and regional managers. Interview data related to the INGOs' organisational language and translation policies and their histories were coded and analysed in the qualitative data analysis software NVivo. Finally, the analysis also refers to secondary literature on Tearfund and on Oxfam GB's language and translation policy (Footitt 2017; Hollow 2008; Lehtovaara 2009; Sanz Martins 2018).

Organisational background

Both Oxfam GB and Tearfund are organisations that strive to end poverty, yet they differ considerably in organisational structure, size, income, and history. Table 2 presents details on Oxfam GB's and Tearfund's geographical operations, annual income, and staffing numbers.

Table 2. Organisational details based on Annual Reports 2019

	Oxfam GB	Tearfund
Active since	1942	1968
Head office	Oxford, UK	Teddington, UK
Countries of operation	67	51

¹ <http://www.reading.ac.uk/listening-zones-ngos>

² <https://sites.google.com/view/translation-as-empowerment>

(exc. HQ)		
Income for 2019	£434m	£76.3m
Staff on payroll	UK HQ: 2,455	HQ: 424
	Overseas payroll: 2,646	Overseas: 113 Total: 537
	TOTAL Oxfam GB: 5,101	

Oxfam was founded in 1942 as the Oxford Committee for Famine Relief by a group of Oxford-based campaigners who aimed to help starving citizens in occupied Greece by sending them food supplies. Since then, Oxfam has grown into a global organisation that provides emergency relief and engages in long-term development projects. Tearfund was founded more than 25 years later, in 1968, and grew from the UK-based Evangelical Alliance. Tearfund's establishment was aimed to address a gap in the existing UK charity sector, i.e. there was no evangelical Christian organisation in which Christian compassion and preaching the gospel were combined with social action (Hollow 2008: 16). As a Christian organisation, Tearfund has traditionally done much of its work through local churches and local community groups (Hollow 2008). This feature of its work is important to understand Tearfund's approach to translation, which, as we will see, is strongly rooted in the idea that translation of information for and by local communities is important for communities' empowerment: communities can make information their own as well as voice their opinion more easily if translation into and from local languages is supported.

Table 2 gives details on Oxfam GB, but it is important to note that Oxfam GB is just one of twenty existing Oxfam affiliates, which together make up the 'global confederation' Oxfam International and is led by the Oxfam International Secretariat. Despite their difference in size, both Oxfam GB and Tearfund work in similarly vast geographical regions, including Latin America, Africa, Asia, and the Middle East. Both organisations have a UK office, sometimes referred to as their head office, from which they support country

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programmes and engage in fundraising. This article aims to shed light on how these large international NGOs work according to their organisational value of inclusiveness across linguistically diverse regions. As indicated in the introduction, inclusiveness is considered an important working value across the NGO sector. Oxfam and Tearfund, along with some 50 other NGOs, have committed to working according to the Core Humanitarian Standard mentioned above (CHS Alliance et al. 2014). This standard includes a commitment to ensuring that organisations work inclusively, with regards to their own staff as well as with their partner organisations and local communities (CHS Alliance 2020; CHS Alliance et al. 2014). In addition, Oxfam GB's and Tearfund's own organisational values foreground the need for respect, equity, and empowerment of the poor. Oxfam GB describes conducting its work according to values of empowerment, accountability and inclusiveness (Oxfam GB 2020). It defines 'empowerment' as meaning that "everyone involved with Oxfam, from our staff and supporters to people living in poverty, should feel they can make change happen", and 'inclusiveness' as "We are open to everyone and embrace diversity. We believe everyone has a contribution to make, regardless of visible and invisible differences" (ibid). These values share common ground with Tearfund's principles of 'truthfulness' ("We are honest and transparent in every interaction"), 'courageousness' ("Speak[ing] out for the voiceless and uphold justice and fairness"), and its organisational aim to "empower communities to lift themselves out of poverty" (Tearfund 2020d, 2020b). The discussion below describes the contents of these organisations' translation policies, and explores to what extent the value of inclusiveness is reflected in them.

What do NGOs' translation policy documents aim to regulate?

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Oxfam GB's and Tearfund's translation policies are mainly concerned with describing the remit of work of the INGOs' internal translation teams, which are based in their UK offices. Both the translation teams in Oxfam GB and in Tearfund aim to provide support to colleagues based inside and outside the UK. The teams only have two to three staff members, with much of the actual translation work done by freelancers. For Oxfam GB, it is important to note that the Oxfam International Secretariat also has a small translation service of two staff members. Since March 2020, the two teams work officially as a common Translation Service. The services provided by the translation teams in Tearfund and Oxfam are comparable to those of a translation agency: any staff member in the organisation can commission a translation, and payment usually needs to be made through the department or team that requests the translation.

The overall structure of the two policies are presented in Table 3, with bullet points corresponding to the headers that are used in the policy documents. Both documents are relatively short (2-3 pages) and they contain components that are common in policy documents, such as statements of purpose, responsibilities for translation, and budget.

Table 3. Overall structure of Oxfam GBs' and Tearfund's translation policies

Oxfam GB: 'Translations Policy'	Tearfund: 'Translations Policy'
Introduction <ul style="list-style-type: none"> • Policy statement <ul style="list-style-type: none"> - When it is mandatory to use the translation service • Scope and Eligibility <ul style="list-style-type: none"> - Oxfam GB and Oxfam International • Policy purpose • Related documents • Version control 	Introduction <ul style="list-style-type: none"> • Purpose of the policy • Aim of translation work • Staff's language skills • Organisational languages
Policy Contents: <ul style="list-style-type: none"> • Definitions 	<ul style="list-style-type: none"> • Languages translated
<ul style="list-style-type: none"> • Standards <ul style="list-style-type: none"> - Oxfam's main working languages - Languages of the internal translation service 	<ul style="list-style-type: none"> • Funding translations <ul style="list-style-type: none"> - Importance of translating publications into the four core languages - Budget held by the Language Editor for

- What needs to be translated (external, internal, legal)	specific publications
<ul style="list-style-type: none"> • Responsibilities <ul style="list-style-type: none"> - Translation service - Author/commissioning agent - Budget - Necessity of proofreading 	<ul style="list-style-type: none"> • Translation requested through the Language Editor <ul style="list-style-type: none"> - Who can request translation (all staff) - Who carries out the translation (freelancers)
	<ul style="list-style-type: none"> • Translation of documentation in-country <ul style="list-style-type: none"> - Guidelines for working with a translator in-region - Necessity of proofreading
	<ul style="list-style-type: none"> • Translation of International Publications <ul style="list-style-type: none"> - Guidelines for country offices on local requests to translate Tearfund material
	<ul style="list-style-type: none"> • Translation of key corporate documents <ul style="list-style-type: none"> - Defines which documents are key - Defines other local corporate documents that need translation
	<ul style="list-style-type: none"> • Appendices: <ul style="list-style-type: none"> - Scope of the language editor role - Service level agreement
Other documents referred to: - Link to webpage on how to request a translation in Oxfam	Other documents referred to: - Guidelines for international staff on how to request translation - Guidelines on local language translation

The introduction of both policies includes a purpose statement. Oxfam GB’s policy states that its purpose is ‘to define the remit of the Oxfam Translation Service and to provide guidance on how internal and external products produced by Oxfam GB and Oxfam International Staff need to be translated’. Similarly, Tearfund’s policy states that its purpose is ‘to provide a guideline for translation work for Tearfund, to which all teams can refer when requiring documents in a different language’. Both policies then provide information on the relevance of translation to their organisation. This information is kept short in Tearfund’s policy, which states that ‘The underlying aim of all our translation work is to achieve optimum clarity in communication between people who speak different languages’. Unlike Tearfund’s policy, Oxfam GB’s policy contains an explicit policy statement, which defines when and why staff is required to use the internal translation service.

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It is mandatory to work with/use the Oxfam Translations Service when there is a need to have a product translated into one or more of Oxfam International and Oxfam GB core languages in order to ensure that:

- Oxfam's messages are communicated effectively and clearly
- Information is accessible and inclusive to all target audiences
- There is no risk to brand, staff or program security

The statement positions the role of translation in at least three different ways: firstly, as a resource to communicate Oxfam's message; secondly, as a tool that ensures access and inclusion; and thirdly, as a risk that needs to be managed by professional linguists. These understandings of translation to some extent echo the orientations described in Ruiz's influential article on orientations in language planning (1984), in which he defined three orientations that frequently lie at the basis of language policy: language-as-resource (in this case, translation as a resource for effective messaging in various languages), language-as-right (here, translation to ensure accessibility and inclusion), and language-as-problem (here, translation as risk).

The orientation of **translation as a tool for inclusion** seems to be rather limited if we consider that the languages that the policies and the internal translation services cover are restricted to a handful of lingua francas, mainly former colonial languages. Both policies include what can be considered as policy statements on the organisations' official or core languages. This is despite the fact that the policies are explicitly positioned as 'translation policies' and regulating official language use is thus not their main purpose. The inclusion of these statements in the translation policies confirms Meylaerts and González Núñez (2018) argument that translation policies arise as a consequence of language policies: once a decision has been taken about which languages are key for organisational communication, translation provision into those languages needs to be regulated.

Oxfam GB:

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Oxfam International's and Oxfam GB's main working languages are English, French, Spanish and Arabic

The remit of the Oxfam Translation Service is therefore English, French, Spanish and Arabic.

Tearfund:

A minimum expectation for all staff is that they are able to speak and write English fluently. Our other core organisational languages are French, Spanish and Portuguese.

Languages translated: Our core languages for translation are into and from English, French, Spanish and Portuguese.

It is notable that Tearfund's policy requires all staff to have fluency in English, while Oxfam's policy does not. This has potential consequences for inclusion of staff within the organisation, and I will come back to this later. As to the selection of main working languages, Oxfam's policy includes some information on what motivates these choices: 'results from an assessment of the organisation's ongoing and foreseeable translation needs carried out in April 2018'. It also states that the translation service will continue to monitor the needs and adapt accordingly. Tearfund's policy lacks a statement on the reasons for language selection, but its choice can be explained by the fact that English, French, Spanish and Portuguese have official status and/or are widely spoken in key regions where Tearfund is active, such as Latin America and various African countries.

The policies also describe which **materials** are made accessible through translation by the internal services. Oxfam GB's policy states that the 'products' referred to in the policy 'cover all types of communication', including paper documents, e-mail, video, websites and intranet content. However, there are limits on what is translated within these categories: the policy contains criteria on the basis of which staff should decide whether a product needs to be translated by the internal translation service or not. For products for an internal audience, the policy for example states that a document needs translation if it contains information that is essential for staff within the organisation 'who do not share the original language of the product, in order for them to do their job and to work effectively within the organisation'. For

external audiences, the policy defines translation as necessary when an audience needs

‘access to the information contained within it, in order to meet the desired aims of the

product’. Finally, the policy also indicates that translation may be necessary ‘in order to meet

legal requirements’.

Tearfund’s policy focuses on two text types: key corporate documents (e.g. policy and strategy documents) and international publications. Tearfund is well-known for its international publications, which include magazines and handbooks with practical information on for example agriculture and public health. The selection of materials that the internal service translates may seem less varied than in Oxfam GB, but this is due to the different types of material that the two INGOs generate. For example, Oxfam GB produces a wide range of advocacy and campaigning materials, which can include anything from online videos to press releases, while Tearfund’s focus has traditionally been more on materials that are of direct use to communities. Concerning corporate documents, Tearfund’s policy states that translating these is important ‘in order to safeguard accessibility’. This statement to some extent contradicts the earlier indication that staff are expected to have fluency in English, as the service does provide translation of some internal documents.

Although only a limited number of languages are covered by Oxfam GB’s and Tearfund’s translation services, **the policies do acknowledge that translation in other languages takes place in the organisations**. Oxfam GB’s policy states that: ‘For language combinations outside its remit, the Oxfam Translation Service may offer support or guidance’. Tearfund’s policy is more detailed in providing guidance on translation needs that fall outside its remit. More precisely, the content point on ‘Translation of documentation in-country’ advises that in the case of in-country staff seeking to recruit translators locally, two points should be kept in mind: firstly, that translation ‘is made into the translator’s mother tongue language’, and secondly, that documents are proofread where possible. While these

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guidelines help ensure the accessibility of documentation, they can also be read as stemming from an interpretation of translation as risk, where inaccurate translation may lead to reputational damage for Tearfund as a respected and professional NGO. The next point in its policy too can be understood in this way. Under the heading 'Translation of International Publications', the policy provides guidelines on what to do when requests are received for permission to translate Tearfund's international publications into a local language. Over the years, Tearfund's material has been used and translated by local church groups and communities all over the world. For example, its PILLARS Guides have been produced in over 80 languages (Tearfund 2020c). The policy describes that Tearfund needs to be acknowledged as the source when translating into a local language, and that nothing can be changed or added to the material. In addition, the policy requires anyone who translates its material to follow Tearfund's 'guidelines on local language translations of Tearfund publications', which can be obtained from the translation service. However, 'the Tearfund logo may not be used'. In short, the policy ensures that there is a clear procedure to assist local groups in translating material and making it more widely accessible, thus using translation as a tool to enhance accessibility and inclusion. At the same time, risk posed by low-quality translation to Tearfund's reputation is managed through distancing techniques such as not allowing the Tearfund logo to be used.

Overall, Oxfam GB's and Tearfund's translation policies regulate three key areas of translation: first, they define the remit of the internal translation services, including language choices; second, the policies include practical guidance on how to collaborate with the translation services (criteria on when to use it; procedure to commission translation, who is responsible for what); third, the policies provide some limited advice on what to do if the translation need falls outside the remit of the UK-based services. Yet perhaps what is more notable than what the policies regulate is what they do *not* regulate: the translation

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phenomena regulated are limited in terms of languages, types of documents and forms of access, mode of delivery (e.g. no interpreting), and they are largely limited to professional translation. In other words, the policies only regulate a fraction of the actual interlinguistic communication that takes place in the work of INGOs. This raises questions on who these policies actually serve, and how they came to look like they do.

What were the organisational circumstances that led to the creation of these policies?

Information from semi-structured interviews as well as from secondary literature provide more details on the organisational circumstances that motivated policy choices. I focus on the 'when' and 'why' of policy creation by discussing the specific moments in organisational history that led to the introduction of the policies.

The choice to adopt a multilingual language policy and a subsequent translation policy came at **comparable moments in organisational history**, i.e. at moments of significant changes to the INGOs' organisational structure. Steady organisational growth made linguistic needs more complex and pressing over the years. However, it was plans to decentralise and regionalise the organisations that triggered the creation of language and translation policies. Processes of decentralisation and regionalisation in INGOs typically devolve jobs away from head offices in the UK and/or create new posts at the regional or country level. By doing so, INGOs hope to be present closer to the grassroots level where projects are delivered, and to create a more horizontal power structure within the organisation.

Oxfam GB went through a process of 'regionalisation' around the time that it adopted a multilingual policy in 1999 (Footitt 2017). Internal documents from this period that discussed Oxfam GB's strategic planning approach indicated that 'It is clear... that

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translation (including interpretation services) is a key Strategic Area for Oxfam's communications in a regionalised and globalised Oxfam' ('Think Global Workshop' October 1998, as quoted in Footitt, 2017, p. 11). However, it would still take Oxfam GB until 2009 to appoint a translation manager. In his 2018 article, Sanz Martins, translation manager at Oxfam GB since 2011, described that his job as translation manager was initially to undertake an extensive review of Oxfam GB's multilingual needs and challenges. This review revealed amongst others that the existing ad-hoc approach to translation led to a waste of financial and staffing resources, some translation work was duplicated, and multilingual staff were often translating material, meaning they had less time to do their main job. Translations were also relatively poor in quality, because proofreading was not required, and they were characterised by inconsistent terminology. These findings were the basis for Oxfam GB to pilot a centralised translation service (Sanz Martins 2018:109).

Tearfund went through a restructuring process as well in 2008, when it implemented a 'change from having desk officers located in the UK to having country representatives, many of whom are located in the countries for which they are responsible' (Tearfund 2010:15). This went hand in hand with an increased need for translation within the organisation. One staff member explained that previously,

It was more important for the partners to be able to speak English because they would not be communicating with a local Tearfund office, but rather they would be communicating directly with the head office in Teddington, so it was more important they could speak English, and all communications would be in English. As time has gone on, as we have decentralised our work and we've got offices overseas, it's become possible for us to be more localised and inclusive within the language, so we can afford to be less Anglo-centric. (Interview 10, Tearfund staff, 29.06.2017)

In other words, decentralisation led to the need for more organisational documentation in other languages than English. Tearfund already had a department in its UK office that dealt with the translation of its international publications, which was established in the 1990s. The increased need for translation and some changes in the composition of its publication department led to the institutionalisation of the position of language editor, which was later

This is the author accepted manuscript of: Wine Tesseur. 2021. Translation as inclusion? An analysis of international NGOs' translation policy documents. *Language Problems and Language Planning*. DOI: 10.1075/lplp.21002.tes reviewed and renamed as 'translation editor'. This change also came with the development of the translation policy under analysis in this article, which was based on an earlier, initial language policy related to Tearfund's international publications (Interview 6, Tearfund staff, 08.02.2017 and private correspondence January 2021). This information provides some more insight too into why Tearfund's translation policy mentions translation into local languages and has separate guidelines available for local language translation. From the very beginning of the publications service, there was an understanding in the team that translating information into local languages - and in fact, involving local communities in creating these translations themselves – played an important role in enhancing local community empowerment and ownership of information (Interview 12, former Tearfund staff, 14.07.2017). However, the analysis of Tearfund's written policy document shows that this understanding of translation is currently not articulated in its policy.

(How) can these policies contribute to organisational values, particularly aspirations of inclusion?

The discussion so far identified different reasons for creating translation policies and different conceptualisations of their value. In a context of organisational growth and restructuring, translation needs became more pressing. Policy documents positioned translation as a resource for effective messaging and reaching various target audiences, and translation was also considered as a risk that needed to be managed. However, the link between translation and inclusiveness is not explicit in the current policy documents, and I here reflect on some of the policy choices and how they may affect aspirations of inclusiveness. I focus on two key points: the role of English vs. aspirations of inclusiveness, and the limited nature of the current translation policies as descriptors of the remit of the translation team.

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Firstly, there is the seeming paradox between striving to create an inclusive organisation that values diversity and equity among staff, and the use of English as a lingua franca. For Tearfund, whose translation policy indicates a requirement for English fluency, a recent interview with Tearfund staff (Interview 14, 14.12.2020) revealed that these issues and potential shortcomings of the policy are now actively discussed in the organisation. It was felt that the contents of the policy and the emphasis on English no longer reflected Tearfund's reality nor what kind of organisation Tearfund aspired to be.

English generally has high status in the INGO sector, as in other international sectors, and its (potential) effects on exclusion from training and career opportunities has been the topic of ongoing debate in INGO circles for decades (Footitt 2017; Garrido 2020; Hopgood 2006; Roth 2019). Oxfam GB experienced the exclusionary effects of language diversity during a strategic planning process in 1994, as part of which it aimed to include all Oxfam staff in all field offices. The review of this process indicated that:

While it [Oxfam] is a multi-cultural organisation, English is still the dominant medium, and many field staff are excluded from key debates because they lack proficiency in English. Oxfam has never been able to decide whether to use English and recruit and train staff in English, or whether to be multi-lingual and invest in translation resources, which would be costly. The problems and conflicts of language come up in every major exercise undertaken by the organisation, and yet the issue continues to be unresolved. (Wallace and Burdon 1994:28)

Oxfam GB's decision to implement a multilingual policy of four languages in 1999 can thus be considered as decisive action that aimed to address the issue of English dominance. However, a study from 2009 commissioned by Oxfam GB on staff's views of its new multilingual policy indicated that staff still perceived English to have a dominant role and felt that the four languages were not treated equally (Lehtovaara 2009). In short, Oxfam GB's case shows that adopting a policy of (restricted) multilingualism does not automatically translate into changes in (perceived) practice.

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The second point to raise is about the limited nature of the current translation policies: their key purpose is to describe the remit of the small internal translation teams, and because of this, they contain limited information or policy choices on language work that falls outside that remit. Firstly, the languages that the teams provide translation in are chosen on the basis of country teams and projects' needs, but also on the basis of cost-effectiveness (reaching a wide audience with minimal investment). While this is understandable, the **downside** is that these policies risk repeating and reinforcing dominant power structures between INGOs and those they work with **by primarily focusing on lingua francas**, mostly former colonial languages.

There is also an issue with the **limited nature of** the current translation policies in terms of **mode of delivery and access**: they hardly refer to the need for interpreting or oral translation, which could be considered as remarkable since some of the communities that INGOs work with have low literacy, speak languages that are oral only, and include blind and deaf communities. The policies' emphasis on written communication can perhaps be interpreted as a manifestation of the Western fixation on the written word, and of the fact that written translations have a longer shelf life. It is also important here to note that the translation teams indicated they were providing some interpreting assistance, but that this was not a commitment included in their policy currently because of a lack of capacity and resourcing (private correspondence, Oxfam GB, February 2021). Interestingly, the interview data indicated that both translation teams noted an increased request for interpreting assistance, particularly on online calls since the outbreak of the COVID-19 pandemic, so this may be an area of growth in future if resources are made available.

Finally, a relatively new phenomenon that is not referred to in the policy documents is the **use of translation technology** by staff, and particularly free machine translation software such as Google Translate. This is a potentially risky gap in policy provision. The use of such

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software has increased in recent years, as quality has improved and more languages are available for translation (Tesseur 2020). The widespread use of machine translation (MT) raises the necessity for guidance and training (often referred to as ‘machine translation literacy’, Bowker and Buitrago-Cirio 2019), e.g. (why) quality in many local languages is low, MT's limited ability to deal with cultural differences, and what happens to the data that are entered. Staff do not always realise that data that are entered into free translation tools are typically used to train the software, and this may lead to data security breaches (Slator 2017). In addition, the recent developments in the technology can lead to seemingly well-formed language, but there is a risk of mistranslations being included, which could have serious repercussions. Although not discussed in its policy, Oxfam GB does have some information on why the use of MT should be avoided on its intranet (Private correspondence, Oxfam GB, February 2021), but further clear policy statements on how this technology can and should be used effectively and responsibly can further ensure inclusion and protect people from risk.

The above critique on the contents of the translation policy documents raises an important related question: is a translation policy the right place to include policy choices that regulate aspects of interlingual communication that fall outside the remit of the translation team? This question is currently explored by Tearfund, which is considering developing a broader, overarching language policy. A Tearfund staff member shared that there was a recognition in Tearfund that ‘the translation policy covered more the basics of what language we translate into and how that’s done (...) Whereas I think now the language policy would also address other issues of language and inclusion’ (Interview 14, Tearfund staff, 14.12.2020). This change in thinking was partly triggered by changes in staff that resulted in more emphasis being placed on aspects of communication and inclusion:

Our internal comms team have started doing a lot more in terms of sharing communications with all staff, making them accessible, making our communications more diverse and inclusive. We also have an

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 organizational change manager who's responsible for diversity and inclusion, so we've been having conversations between us. (Interview 14, Tearfund staff, 14.12.2020)

These conversations considered the necessity for more translated resources to create a more inclusive organisation, and the continuous challenges of limited resourcing and capacity. For internal communications, other changes to language use apart from translation were also considered, such as 'writing and speaking English in a way that can be accessible to non-mother tongue English speakers' (Interview 14, Tearfund staff, 14.12.2020). The current changes in Tearfund indicate a potential significant shift in the organisation towards a more overt consideration of the link between language and inclusion, which would position Tearfund as a leading example in the NGO sector.

Conclusion

This article explored what INGOs' translation policy documents aim to regulate, what the organisational context is in which such documents took shape, and discussed some of the tensions and gaps between INGOs' working values of inclusiveness and their translation policies. One of my aims with this article is to provide practical guidance to INGOs who may be considering if creating and implementing such a policy is useful to their operations. Based on what interviewees have said, I provide an overview of the potential advantages and drawbacks of translation policies as they currently exist in Oxfam GB and Tearfund in Table 4.

Table 4. Potential advantages and drawbacks of a translation policy

Potential advantages	Potential drawbacks
- Creates clarity about the NGO's position on language	- Having a policy does not automatically lead to implementation nor to visibility
- Creates clarity on who is responsible to commission and pay for translation	- Risks reinforcing power imbalances if focused too much on lingua francas, including English
- Creates clarity on who takes ownership of the translation	- Does not provide visibility nor guidance to the informal translation and interpreting work conducted by staff
- Improves cost-efficiency	- A policy needs regular updating and thus regular resourcing
- Improves terminology consistency	- A commitment to translation is often perceived
- Improves translation quality	
- Raises the visibility of the role of translation in	

- the INGOs' work as expensive
- Raises the visibility and status of the translation team (if it exists)
 - Offers an opportunity to link translation to organisational strategy
 - Offers an opportunity to link translation values such as inclusion and equality
-

Some of the key themes that interviewees mentioned were that a policy can help delineate (financial) responsibilities on who is expected to provide translation into what language and on what occasions, and who can take ownership of the work. Furthermore, organisations who opt for a combination of different working languages may be seen as recognising the importance of language diversity. A potential drawback of such policies is that they risk repeating the rhetoric of language diversity, but in practice only encourage diversity in a limited number of languages that may reinforce existing power dynamics.

Based on my understanding of the data and motivated by social justice aims, I finish this article with three key recommendations for INGOs. Firstly, any INGO that aims to create a language or translation policy should make the link between inclusion and the role of language and translation more explicit by referring to organisational values and other existing organisational policies, such as policies on disability, diversity and inclusion. As suggested earlier, it may be appropriate for organisations to develop a broader language policy rather than a translation policy. This approach would have at several advantages. For example, such a policy could be signed off and supported by a higher management level, giving it more visibility and authority. As discussed, the existing translation policies only cover the remit of the internal translation team, and in both Oxfam GB and Tearfund, these policies are signed off lower in the organisational hierarchy (e.g. departmental level). In addition, the broader policy could cover a wider range of language practices, such as the widespread need and use of oral translation that supports inclusion and democratic participation in developing

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countries, especially in communities with low literacy rates. A commitment to translation as a two-way process, with translation also taking place *from* local languages, and not just from English as a way of disseminating information, would also be important as part of NGOs' emphasis on working inclusively and according to values of equity and empowerment. Finally, such a policy can also ensure proper resourcing for the existing translation team, allowing them, for example, to expand their services to include interpreting.

A second recommendation is that INGOs can use the process of creating a language or translation policy as a way to consciously consider the exclusionary effects of language diversity in their work, and how oral and written translation can serve as a tool to overcome such barriers. Rather than considering translation as an administrative burden which slows down work and is often considered expensive, creating a language or translation policy can go hand in hand with considering methods to better assess or measure the positive contribution that translation makes to an INGO's work. INGOs do not generally collect data on these issues, so a first important step would be to collect data on staff and communities' language needs, skills and preferences. Next to informing policy choices, this data can help demonstrate the value of spending money on language provision to donors. The data can also help position an INGO as an innovative learning organisation which takes inclusiveness seriously by considering its linguistic dimension.

Finally, written policy documents are better considered as only one potential tool to enhance linguistic inclusion. This will come as no surprise to language policy researchers but is nevertheless an important point. Staff from the internal translation services in Oxfam GB and Tearfund commented on the necessity to provide guidance and training to 'educate staff on the importance of translation and about the time, effort and resources it requires' (Sanz Martins 2018: 115). Such events included workshops for new staff and risk assessments that demonstrate the advantages of using professional translation.

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With this article I have aimed to respond to Mark Fettes' (2015) call for more research on the practical challenges of linguistic inclusion by focusing on language provision in the work of INGOs as key deliverers of the UN's sustainable development agenda. The article makes a contribution to the field of LPP by using the case of NGOs as an illustration of language problems on a global scale. It shows that global structural issues tied in with a colonial history and unequal power relationships are also reflected in NGOs linguistic policies, which, despite efforts to work according to principles of inclusiveness and equity, still favour former colonial languages. The article has uncovered some of the key challenges that INGOs experience in balancing limited resources and ensuring linguistically inclusive and equitable working practices.

For both Translation Studies and LPP, the case study has exemplified what the difference is or can be between a language and a translation policy. As argued by Meylaerts and González Núñez (2018), the two types of policies are interrelated, and the current article has provided an example of how the two concepts are interpreted by INGOs in their policy documents.

Finally, the case study has also drawn attention to how the use of new technologies is changing the nature of language problems and solutions. While these new technologies open new possibilities for ensuring access and inclusion, they also raise various ethical questions on quality, data protection, establishing trust and demonstrating respect to others. Thus, there is more ground to be covered by scholars working in LPP and in Translation Studies in their efforts to contribute to current global development challenges.

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