



Educational Partnerships Delivery & Assessment in Another Language Framework

1. Context and Introduction

a) Introduction

1.1 This framework is designed to provide a set of conditions and expectations with regards to the delivery and/or assessment of Keele University provision and/or awards through an educational partnership in a language other than English. Whilst this framework applies predominately to taught undergraduate and postgraduate provision, it may also apply to PGR provision, particularly in circumstances in which some elements of a student's PhD study is undertaken in a language other than English, and in particular, as it relates to the Keele award.

1.2 Delivery and assessment of Keele's provision through an educational partnership in a language other than English will only be considered in exceptional circumstances, where there is a robust rationale, normally linked to localised market demand and/or need, and on the expectation that the measures set out in this framework can be supported through a costed Financial Business Case and appropriately implemented by Keele and/or proposed educational partner. In all cases in which delivery and assessment of Keele's provision through an educational partnership in a language other than English is to be considered, it should be recognised there will be considerable demands placed on both Keele and educational partner to effectively manage and oversee the quality and standards of Keele's provision and therefore, such arrangements should not be considered as replacing normal expectations with regards to language of delivery and assessment in English.

b) Scope

1.3 This framework applies to all partnerships and partnership activities as defined in the [Educational Partnerships Code of Practice](#) and to any partnership arrangement leading to credit or an award of Keele, in which Keele must take ultimate responsibility for the academic standards and the quality of learning opportunities. It should be read in conjunction with the Principles for Engaging with and Delivering Keele Programmes through Educational Partnerships, as set out in the Educational Partnerships Code of Practice and Keele's wider [academic regulatory and policy framework](#).

2. Conditions for Delivery of Keele Provision in a Language other than English

2.1 As set out in the Principles for Engaging with and Delivering Keele Programmes through Educational Partnerships, Keele normally expects that the primary language of instruction and assessment of any Keele provision delivered through an educational partnership be in English, unless in exceptional circumstances, for which there is a clear academic and strategic rationale, with robust frameworks established for maintaining academic quality and standards.

2.2 All new educational partnerships in which the delivery and assessment of Keele provision is to be considered in a language other than English, or bilingually, should be explored through the partnership development and approval stages of new educational partnership approval set out in the Educational Partnerships Code of Practice, with the delivery, assessment and operational framework adhering to the following set of conditions and expectations:

- a) New partnership proposals must demonstrate through evidenced networks and established precedent that it will be possible for Keele to secure the services of bilingual academic staff with the relevant subject specialism and/or experience of applying UK higher education marking and moderation practices, to act as internal moderators and external examiners for Keele assessment delivered by staff and undertaken by students at an educational partner. The scale and scope of the appointment of suitable bilingual staff to act as internal moderators and external examiners should be considered against the number and type of assessment components within a module, the number of students enrolled on a module, and the number of modules an internal moderator is appointed to oversee, alongside the hourly rate and total number of hours allocated to complete the necessary responsibilities, with associated costs factored into the Financial Business Case of any new educational partnership proposal.
- b) Regardless as to whether there is evidence to demonstrate confidence in appointing suitable bilingual staff to act as internal moderators and external examiners, a robust contingency plan must be established as a requisite for partnership approval, setting out clearly how Keele can continue to maintain oversight of quality, standards and the application of Keele's academic regulations, particularly marking and feedback as set out in the Keele [Marking and Moderation Policy](#) and [Assessment and Feedback Code of Practice](#), with or without the appointment of bilingual staff, with the minimum expectation in the event suitable bilingual staff cannot be appointed, there is sufficient and suitable translation of marked student assessment to enable Keele to moderate it internally in English. For the benefit of doubt, without a suitable contingency plan and sufficient evidence to demonstrate confidence in appointing suitable bilingual staff an educational partnership will not be considered for approval.
- c) All Keele provision delivered and assessed in a language other than English must be based on Keele provision developed initially in English by Keele academic staff, which

must not be deviated from unless localised contextualisation has been agreed by the relevant Keele Module Leader, and in any event, must be reflected in English via the relevant Keele Module Specification, setting out clearly in English the module's learning outcomes, assessment structure and learning and teaching activities. All supplementary documentation related to Keele regulations and policies issued to students must also be based on the original English versions of the same documentation produced by Keele, with it expected that whilst for example a Programme Handbook may be translated from the original English version produced by Keele, any and all reference to specific regulatory and policy content relevant to students remain in English. Keele's regulations and policies as they appear on the Keele website will take ultimate precedence over all translated information produced by a partner and issued to students.

- d) All translated materials must be based on the original materials produced in English by Keele, with it expected that translation will be completed by the partner, or a suitably sourced translation service. In all cases in which Keele materials have been translated, the partner will be contractually responsible for ensuring their accuracy, with Keele reserving the right to place an expectation on the partner they re-translate any materials thought to be inaccurate, at the partner's expense, and in extreme cases, via a translation service nominated by Keele.

- e) All students recruited to a Keele programme or Keele provision delivered through an educational partner, regardless of its language of delivery and assessment, must meet the agreed entry criteria set between Keele and the partner, and must hold sufficient English language ability to be able to engage with the Keele regulatory and policy framework in English, and where relevant, learning materials, particularly those published externally, not available in the proposed language of delivery and assessment. Prospective students' English language ability should be thoroughly explored, in consultation with the Keele Language Centre, during the new partnership development and approval stages with the partner, including consideration as to how English language ability will be tested through entry criteria, with the minimum English language requirements published alongside marketing and promotional materials for the programme/provision to be delivered and assessed in a language other than English. It is normally expected that students must hold a minimum proficiency in English equivalent to B2 on the Common European Framework (CEFR). Where through the new partnership development and approval stages it is determined additional English language testing and/or support may be required, the Keele Language Centre will advise on the model of testing and/or provision to be delivered at the partner to enable students to engage with Keele's regulatory and policy framework in English. Any additional input provided by the Keele Language Centre in support of partnership delivery should be costed into the Financial Business Case.

- f) Module reading materials will be linked in English via the Keele Learning Environment, however, subject to approval by Keele Module Leaders, the partner will be permitted

to link to and refer to the same reading materials produced in the language of delivery and assessment provided they have been published in the language of delivery and assessment, or suitably translated, for which the partner will be contractually responsible for ensuring their accuracy. Where reading materials are not available digitally in the language of delivery and assessment, the partner should ensure that their library is sufficiently stocked with these materials, or that the materials are available and accessible to students via local library facilities. It is expected the availability of locally sourced reading list materials is considered during the partnership approval stages with any significant challenges in securing and/or accessing reading list materials clearly set out alongside a proposed contingency plan.

- g) Those appointed to deliver Keele's provision at the partner must continue to be approved by the relevant Keele School and must hold sufficient levels of English language ability to effectively engage with their Keele counterparts including the Keele Module Leader, Link Tutor/Programme Director and relevant Faculty Operations Team. All meetings formal or informal between Keele staff and those at an educational partner at programme level will be conducted in English.
- h) The core language of delivery and assessment must be the same where it relates to Keele provision, with the exception of placement activities in which case the language of delivery may differ, provided the conditions set out above can be implemented. Where Keele provision is delivered as part of a joint programme (and/or leading to a dual award), or part of a double award (or equivalent), a partner may wish to offer their own provision in the language of the host country, although it is normally expected in this scenario the Keele provision will be delivered and assessed in English.
- i) In any case, and on exception, in which it is proposed a change to the language of delivery and assessment for Keele provision be considered with an existing partner, the conditions above will continue to apply. Any proposal to change the language of delivery and assessment from English to another language must be considered in full by Keele via the educational partnership expansion process as set out in the Educational Partnerships Code of Practice, and where relevant, the programme modification process, on advice from the Educational Partnerships Team and Quality Assurance Team in Academic Registry. It is expected that any changes to the language of delivery and assessment of Keele provision will require a fully costed Financial Business Case for the partnership, updated to reflect the increased costs, as well as an updated partnership Risk Assessment.
- j) Any proposal to deliver and assess Keele's provision in another language must be considered against Professional, Statutory and Regulatory Body (PSRB) requirements (where relevant), recognising some PSRB's will prohibit delivery and assessment in another language within their accreditation requirements. Regardless of whether Keele's provision to be delivered through an educational partner is to be accredited, PSRB requirements must be considered to ensure there is no impact on the provision delivered at Keele.

3. Bilingual Moderators and External Examiners

3.1 As a core condition to the delivery and assessment of Keele provision in a language other than English, bilingual internal moderators and external examiners must be appointed. The following criteria will apply to the appointment of both bilingual internal moderators and external examiners, and must be adhered to:

External Examiners

3.2 An external examiner must be appointed to oversee the delivery of Keele provision at an educational partner, in accordance with the [External Examiners Code of Practice](#). As a condition for the delivery and assessment of Keele provision in a language other than English, the external examiner/s appointed at programme level should be appointed in accordance with the standard appointment criteria set out within the External Examiners Code of Practice and hold sufficient fluency in both English and the proposed language of delivery and assessment at the partner, which must be evidenced through the external examiner nomination process. Suitable proficiency would normally be considered equivalent to C2 on the Common European Framework (CEFR). All Keele credit-bearing modules delivered at an educational partner which contribute to the award of credit and/or a Keele degree award will be expected to have oversight from a bilingual external examiner. Appointments will normally be made at programme level, but dependant on the nature of the programme and/or provision delivered at the partner, it may be necessary for multiple external examiners to be appointed to oversee the breadth of provision.

3.3 Each bilingual external examiner will be expected to act in the same capacity as any other external examiner, as set out within the External Examiners Code of Practice, and will receive in the first year they are appointed a representative sample of student assessments undertaken in English at Keele so as to enable them to make a comparison between the academic standards of the programme delivered and assessed in a language other than English at the partner and nearest equivalent programme delivered and assessed in English at Keele.

3.4 Bilingual external examiners will broadly hold as a minimum the following responsibilities:

- a) Review of teaching materials annually produced in English by Keele and translated by the partner to ensure consistency in translation and suitability.
- b) Review a sample of student assessed work.
- c) Review of sample of marking and feedback applied by the partner.
- d) Meeting with students to provide feedback on experience.
- e) Attendance at relevant Board/s of Examiners.

3.5 Consideration will be made in the Financial Business Case during the development and approval of the partnership as to whether any additional costs need to be factored in such as additional fees paid to the external examiner, although it is expected the same

principles applied to the role carried out for other Keele programmes delivered and assessed in English would apply regardless of language of delivery and assessment, and as such the workload would broadly remain comparative.

Internal Moderators

- 3.6 In addition to the appointment of a bilingual external examiner, bilingual internal moderators should also be appointed with suitable fluency in both English and the proposed language of delivery and assessment at the partner. Suitable proficiency would normally be considered equivalent to C2 on the Common European Framework (CEFR).
- 3.7 Bilingual internal moderators will normally be appointed at an hourly rate rather than on a permanent basis and will carry out moderation on all marked and second marked student assessment in accordance with the Keele [Marking and Moderation Policy](#). The number of internal moderators required will entirely depend on the number and type of assessment components within a module, the number of students enrolled on a module, and the number of modules requiring oversight across any given programme. Hourly rates of pay will be set in accordance with Keele employment and pay policies and any statutory expectations.
- 3.8 Bilingual internal moderators must be appointed on evidence they meet the following criteria:
 - a) Fluency in English and the language of delivery and assessment of the Keele provision at the partner, demonstrable in reading, writing, listening and speaking.
 - b) Experience of teaching and assessment in a UK higher education setting, desirably across the relevant subject(s).
 - c) Desirably possession of a higher degree in a related subject.
- 3.9 For undergraduate provision, it is not necessary for the bilingual internal moderator to hold subject-specific expertise, but they should be able to demonstrate they hold experience applying marking schemes within the context of UK higher education at the corresponding level of study they are being appointed to moderate.
- 3.10 For postgraduate provision, it is normally expected the bilingual internal moderator will hold subject-specific expertise, particularly for those appointed to moderate thesis, dissertation and major project-based work. In the event that an internal moderator with subject-specific expertise cannot be appointed, an internal moderator without subject-specific expertise should be appointed and the partner will be expected to translate a selected sample (as instructed by Keele) of student assessment for the thesis, dissertation and major project-based work into English so that Keele academic staff can moderate alongside the bilingual internal moderator.
- 3.11 The main role of bilingual internal moderators is to ensure the proper application of the Keele Marking and Moderation Policy and Generic Assessment Criteria in relation to marked and second marked student assessed work carried out by approved staff at the

partner, as well as the [Assessment and Feedback Code of Practice](#) with regards to the quality of feedback issued to students by approved staff at the partner. In addition, bilingual internal moderator responsibilities may be expanded dependant on the nature of the provision, number of students enrolled, experience of the partner and longevity of the partnership and any wider quality and/or standards concerns related to the partnership. Responsibilities will include but are not limited to the following:

- a) Moderation of all marked and second marked student assessed work for every assessment component at module level for each module appointed to moderate.
- b) Checks (every semester, annually or periodically as instructed by Keele) on the quality of translation of materials produced by the partner in the language of delivery and assessment (for example, Module Specifications, teaching materials, Programme Handbook), with particular attention paid to materials produced by the partner on agreement by Keele which deviate from the original English version produced by Keele, or do not have an English original (normally in relation to contextualised teaching materials).
- c) Maintain regular contact with the relevant Keele Link Tutor/Programme Director and relevant Programme Leader at the partner ensuring any identified trends and or practices in need of enhancement are properly and timely communicated.
- d) To engage with any documentation and attend where necessary any briefings produced by Keele or the partner necessary for the bilingual internal moderator to engage appropriately with their role.
- e) Produce a report for each module, recording any observations and recommendations regarding the proper application of Keele's marking and feedback requirements, any proposed changes to marks and highlighting any concerns with regards to student engagement with the assessment as determined through moderation, to be submitted to the relevant Keele Link Tutor/Programme Director for wider consideration internally within the Faculty/School and/or with the partner.

4. Programme and Module Management

4.1 All programme and module management between Keele and an approved educational partner will be carried out in accordance with the expectations set out in the Educational Partnerships Code of Practice, the relevant legal agreement between Keele and the partner, the relevant Programme Specification/s and the Staff Operational Handbook, which will set out the necessary processes, structures and applicable regulations and policies to be applied to Keele programmes and provision delivered through the partnership, including the operational implementation and management of this framework.

4.2 All governance between Keele and the partner, including Boards of Examiners, will be conducted in English, with quality assurance mechanisms such as annual partnership review and periodic partner and partnership reviews expected to be completed and carried out in English. It is expected all written documentation produced by the partner

to be shared with Keele as it relates to student voice mechanisms as set out in the [Student Voice Code of Practice](#) will also be produced in English by the partner, for example, Student evaluation and responses, programme level surveys and responses, and minutes from Student Staff Voice Committees.

4.3 Whilst important information pertaining to the delivery of the Keele programme/s and provision may be translated by the partner from the original English, including references to applicable Keele regulations and policies, it is expected all students and staff will engage with Keele’s regulations and policies as they apply to the Keele programme/s and provision delivered at the partner in English. It is recognised however that localised student support services hosted by the partner may be provided in the local language and not English, which is acceptable insofar as they are not acting on behalf of an established Keele academic process, such as academic misconduct, appeals, Keele-related complaints or exceptional circumstances for example.

4.4 Certain documentation will remain in English and will not be permitted to be translated, this includes, alongside Keele’s regulations and policies, the Programme Specification, the official Offer Letter as part of any offer of admission and the Keele Terms and Conditions as they are issued to students studying Keele provision delivered at an educational partner.

4.5 With regards to any placement activity, it is normally expected that placements will take place in the host country of the partner and language of the host country, with placement supervisors (or equivalent) completing assessment documentation (if required) in that language. All placements should however be conducted according to Keele requirements.

4.6 All certificates and transcripts related to Keele provision and a Keele award will be produced by Keele in English, with the language of instruction and assessment noted on the student transcript.

5. REVIEW, APPROVAL & PUBLICATION

5.1 As a general principle, the framework will be reviewed after three years or where operational and/ or legislative requirements change. Approval is via University Executive Committee.

5.2 This procedure will be published on the University policy zone web pages.

6. DOCUMENT CONTROL INFORMATION

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