Translation Quality, Quality Management and Agency: Principles and Practice in the European Union Institutions

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Abstract Translation quality and translation quality management are key concerns for the European Commission's Directorate-General for Translation (DGT), and the European Union institutions more broadly. Translated texts are often legally binding, politically sensitive, confidential or important for the image of the institutions. For legislative texts, an important principle of EU law is that there is no 'original': all language versions are equivalent and equally authentic. Consistency in translation strategies and in the approach to quality is therefore critical.

In this contribution, we first outline the context in which translation takes place in the EU institutions, focusing on challenges for quality. We illustrate how translation quality is managed in practice, identifying two guiding principles: consistency of approach, and consistency of quality. We explain how DGT's quality management policy defines quality and how it should be managed, then demonstrate why achieving 'equivalent' quality across all language versions, translators, and institutions is hard. We examine how translated texts are dealt with in the attempt to achieve this goal. Last, we widen the focus to consider what these challenges and the EU approach mean for translators and their status and agency. Issues of translation quality are also issues of ethics, power relations and professional values.

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1   Introduction

Translation at the EU institutions has been widely documented and discussed by
scholars and leading EU practitioners (Dollerup 2001; Šarčević 2001; Wagner et al.
2002; Correia 2003; Tosi 2003; Koskinen 2008; Robertson 2012, 2016). This is true
at both macro and micro levels, with some studies taking a broad-brush approach
to translation across multiple institutions, while others have narrowed the focus to
specific aspects (e.g. revision and editing; cf. Martin 2007). Some attention has also
been paid to translation quality in the EU (Wagner 2000; Xanthaki 2001; Strandvik
2012, 2014b; Drugan 2013). However, the issue of translation quality *management*
(or translation quality *assurance*)[1] has become increasingly important recently. This
is true both inside the EU institutions and in the translation industry more broadly,
associated with the development of international standards (Corpas Pastor 2009).
Translation quality management is as yet comparatively unexplored by translation
studies academics, however, in contrast to more specific features such as quality
assessment (QA)[2] or quality control (QC).[3] In this chapter, we seek to contribute to
bridging this gap in understanding via a collaboration between EU experts and an
academic specialist in professional translation quality management.

2   Why Is Translation Quality Important for the EU?

Translation quality[4] and quality management are highly significant concerns for the
EU and for the European Commission as one of its key institutions. Why?

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[1]In this contribution, we use 'quality management' to refer to the totality of policies, methods,
processes and procedures designed and implemented to achieve the product and service quality
objectives set. 'Quality assurance', which is part of quality management, refers, in a wide sense, to
operations taking place before, during and after translation (and involving both source and target
texts) to ensure the desired quality of the product. We use the term 'quality assurance' in full
to avoid possible confusion with 'quality assessment', as both may be abbreviated to QA in the
literature.

[2]Methods and procedures used to judge whether, and to what extent, a translation product meets
the established quality requirements. In the EU context, quality assessment is mostly, but not
exclusively, performed on outsourced translations.

[3]The DGT definition of 'quality control' (QC) is "making sure that a translation complies with
the required quality standards for the intended use and the text type concerned". QC relies on
revision (systematic comparison of the original and the translation) and *review* (target-text-focused
checking of the translation to ensure its suitability for the agreed purpose); see DGT's tender
specifications for the OMNIBUS-15 outsourcing call for tender, Sect. 5.1 below; see also the ISO
17100:2015 standard – Requirements for translation services).

[4]In the *DGT Quality Management Framework,* 'quality' is defined, drawing on ISO standards
for quality management, as "the degree to which a set of characteristics fulfils stated or implied
needs or expectations". Hence, DGT's notion of quality is customer-focused. Defined in this way,
translation quality is never absolute but depends on both context and situation. It is the sum of
various quality aspects that may need to be prioritised and it concerns both products and services,
as well the processes involved.

There are two main underlying reasons: efficiency and efficacy. First, it goes without saying that optimising the efficiency of processes is a must and a continuous concern in a context where thousands of in-house translators interact with each other and with hundreds of different internal and external stakeholders in complex work-flows. Second, in terms of efficacy, translation is a key instrument in communicating the entire EU project to the European citizens. In 23 out of the EU's 24 official languages, communication takes place through translations. Translation is therefore a fundamental element in putting the EU's multilingualism policy[5] into practice; as Koskinen (2008) points out, the institutions both carry out translation and depend on translation in order to function. Poor-quality translation would seriously undermine not only the multilingualism policy, but also the institutions themselves. Efficacy matters particularly in the EU context because translated EU legal acts have a legal effect: they create rights, obligations and legitimate expectations. All language versions, once they are adopted, are equally authentic. They are expected to convey the same meaning and produce the same legal effect in all languages and all legal orders. Those using, applying and interpreting the legal acts, be they national authorities, businesses, courts of law, experts or citizens, need to be able to have full confidence in the correctness of the language versions, first of all because, for most EU legislative texts, national courts must be able to "interpret and smoothly apply [them] even when the EU text is the only source of relevant law available to national judges" (Xanthaki 2001). Second, individuals, companies and other parties are now directly affected by, and must comply with, "complex EU legislation affecting a huge chunk of their lives and ranging from equal employment rights to sex equality and from the determination of technical standards for products sold within the EU to the accountancy obligations of EU companies" (*ibid.*). High-quality translations are essential if the stakeholders are expected to do this. Moreover, in the legislative process, the EU institutions are interdependent and rely on the quality of each other's translations. For instance, in the ordinary legislative procedure,[6] the European Parliament and the Council of the European Union have to be able to trust that the Commission's proposal has been translated reliably; and later, when the two institutions try to reach a mutual agreement, they must be able to trust the quality of any additional translation or revision work done by one of them (Strandvik 2014b). Once adopted, EU legislation must also be enforced effectively. This involves reporting, correspondence, infringement handling, etc. which all require good-quality translation.

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[5]See Communication from the Commission to the Council, the European Parliament, the European Economic and Social committee and the Committee of the Regions – A New Framework Strategy for Multilingualism. COM(2005) 596 final. http://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1512987626500&uri=CELEX:52005DC0596

[6]This is the main decision-making procedure used for adopting EU legislation. It mainly involves the European Commission, the European Parliament and the Council of the European Union. For a more detailed illustration of the procedure, see e.g. http://www.europarl.europa.eu/external/html/legislativeprocedure/default_en.htm

In all this and more, the EU's image is at stake. The European project also needs to be communicated effectively. As Gouadec puts it, a defining feature of any institutional translation is that some of the translation carried out will be "*for the benefit of* institutions" (2010; our emphasis). In addition to regulating, the EU must 'sell' its idea – through information materials, press releases, leaflets, brochures, websites, etc. – in order to gain or retain legitimacy and acceptance. This selling is largely done through translations.

Consistency in both the approach to translation quality and in the quality of the different language versions is therefore critical. This means that effective translation quality management has become a central concern for the EU.

3   The EU Translation Context

European Union translation is unusual in several key ways. First, it does not take place in one location, in one central translation service, but separately in different EU institutions. Second, it happens on a very large scale and across an unusually wide, and stable, range of language pairs.[7] Third, EU translation is embedded in an ongoing cycle, with a long history, a huge mass of pre-existing translated texts, and a far-reaching impact in legal and political terms. Of course, on a day-to-day basis, translation is experienced as a multitude of one-off requests or stand-alone jobs, but the institutions and their substantial translation resources are ever present as the background context. Fourth, all the above factors mean that translation *policy* receives unusual attention in the EU. Decades of experience in organising translation has resulted in substantial internal understanding, resources, and attention paid to translation quality. Furthermore, there is a requirement to obtain consistent levels of quality as well as value for money in publicly funded bodies. Policy makers therefore have an interest in and impact on translation quality and its assurance.

The EU institutions producing translations include the European Commission, the Council of the European Union, the European Parliament, the Court of Justice of the European Union, the European Court of Auditors, the European Economic and Social Committee and the European Committee of the Regions, and the European Central Bank. They all have their own translation services (the two Committees

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[7]Theoretically, as far as the EU's official languages are concerned, there are 552 (i.e. 24 × 23) potential language pairs to deal with. In practice, the number of language combinations is considerably smaller, as English is now the overwhelmingly dominant source-language: In the Commission, in 2016, more than 80% of all documents were translated from English. Translation agencies on the market also deal with high numbers of language pairs, of course, but their dependence on client demand and market developments leads to significant fluctuations, with agencies regularly obliged to source new suppliers for previously unheard-of languages at very short notice.

share a joint one), located in either Brussels, Luxembourg or Frankfurt. In the EU legislative process some of these institutions are in closer contact than others. This is particularly true for the Commission, the Parliament and the Council. These three must base their work on each other's translations. In the legislative process, the Commission drafts and translates a proposal, thereby doing the groundwork, not least for terminology. The proposal is then transferred to the Parliament and the Council, the actual legislators, for discussion, negotiation and adoption, and the Commission's translation serves as the basis on which the translation services of the two institutions build their respective translation work, as they translate proposed amendments, modifications or additions. The need for a consistent approach to quality in this endeavour is evident, both within each language and across languages.

The translation volumes are massive. In 2016, for instance, DGT alone received some 73,000 language service requests and produced 2.2 million pages of translations in 24 languages. In total, approximately 1,600 in-house translators and 700 other staff were needed to do the job. Over the years, millions of pages have been translated into every official language, and even the more recently joined member states now have hundreds of thousands of pages of translated documents. This also means that practically all new documents assigned for translation are based on or related to pre-existing documents and texts, and often to multiple different ones. Complex intertextual relations emerge, particularly in the case of legislation. Existing texts set various, and tight, constraints on new ones, in terms of aspects such as consistent formulations, terminology, and definitions of terms. A further important feature in this context is that, with the exception of the Council, the translation services of the EU institutions outsource a considerable share of their production. In 2016, for instance, DGT sent out more than 650,000 pages, i.e. almost 30% of its translation volume, to be translated by freelancers. Under current plans, the proportion of translations outsourced could increase to as much as 40% of the total volume.

As a result of earlier translation work, a very large common central translation memory database, Euramis, with a total of more than one billion memory segments in the EU's official languages, is in place. New translation tasks retrieve information from Euramis so there is an inherent need to ensure the database is fit for purpose and reliable. Each new translation memory segment exported into Euramis should fulfil agreed quality requirements, so as to avoid 'contamination' of future translation memories retrieved from the database. Due to the sheer volume of the database, it is a challenging task to ensure that its design and maintenance are managed efficiently. The need for quality content is arguably more important than ever as the database continues to grow at a rapid pace (as memory tools are used extensively and are expected to produce productivity gains), and in a context of increased outsourcing (since outsourced translations are subject to standard industry practices such as paying translators lower rates for fuzzy matches). Euramis also serves as the basis for MT engines, which are now widely and increasingly used as support tools by EU translators.

4 Consistency of Approach

How can a consistent approach to quality be ensured in such a complex setting? First of all, there has to be a shared understanding of how EU legislative and other documents should be translated and what constitutes good quality in the EU context. Secondly, this idea has to be operationalised in a coordinated manner, both interinstitutionally and within the individual institutions, translation departments, and units. For legislative documents in particular, there must also be sufficient common ground on what quality means between the translators in the translation units and the lawyer-linguists in the institutions' legal services.[8] The common ground must cover notions of both drafting quality and translation quality, since according to Regulation 1/58 "Regulations and other documents shall be *drafted* in the official languages" (our emphasis) and in 23 languages this drafting takes place via translation. In practice, this means that the drafting-through-translation of legislative documents is in effect shared by two groups of people who typically have different educational and professional backgrounds and, arguably, different statuses within the organisation (Strandvik 2014a). This is also a setting where power relations come into play. Namely, in the interinstitutional legislative process, the lawyer-linguists have the final word on the translations and can overrule the translators' choices. Likewise, the lawyer-linguists have traditionally played and are playing a dominant role in setting the norms and conventions for EU legal translation.

Interinstitutionally, the shared understanding of quality finds its expression in a number of common EU norm sources and guidelines. These include:

- the *Interinstitutional style guide* (drafted and translated jointly by the institutions);
- the *Joint Handbook for the Presentation and Drafting of Acts subject to the Ordinary Legislative Procedure* (drafted and translated jointly by the legal services of the European Parliament, the Council and the Commission);

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[8]In the EU institutions, the legal services constitute independent organisational entities, separate from the translation and other services. One of the principal tasks of an EU lawyer-linguist is to ensure that all EU legislation has the same legal meaning in every official language. Lawyer-linguists must therefore be able to discern precisely the intention of EU legislation and make sure that this intention is accurately conveyed in their native language. A degree in law is a prerequisite for the job. In addition, sound linguistic abilities and experience in drafting or translating, checking or revising legal texts are emphasised as professional skills, but no formal degree in languages, linguistics or translation is required (Correia 2003; Strandvik 2014a). However, today this description applies particularly to the European Parliament and Council lawyer-linguists. The role of the Commission's lawyer-linguists, now called legal revisers, has changed over the years. While still doing some translation revision, mostly of translations of the Commission's autonomous acts, they now concentrate mainly on the legislative quality of the original documents, and much less on the quality of translations. As for the European Court of Justice, the translators, who are all lawyers, are titled lawyer-linguists.

- the *Joint Practical Guide of the European Parliament, the Council and the Commission for persons involved in the drafting of European Union legislation* (drafted and translated jointly by the legal services of the European Parliament, the Council and the Commission, and now also annexed to the Joint Handbook listed above); and
- the *Manual of Precedents for Acts Established within the Council of the European Union* (the Council's own set of guidelines, but also used as reference by other institutions; the manual largely overlaps with the *Joint Handbook* referred to above).

These guides and handbooks are *drafting* guidelines, but through their translations into the EU's official languages, and the fact that they contain explicit references to translation, they also become normative *translation* guidelines. They express the institutional intent, how the institutions want to draft legislation in the different languages. They contain both general principles and (partly language-specific) detailed drafting rules and formulae and are meant to serve as reference tools for legislative drafting and other written works for the EU institutions, bodies, and organisations. For instance, the *Joint Practical Guide* (JPG) was drawn up as a result of Declaration No. 39 on the quality of the drafting of Community legislation (1993), annexed to the final act of the Amsterdam Treaty, and the subsequent common guidelines adopted by the European Parliament, the Council, and the Commission in their 1998 Interinstitutional Agreement. According to the JPG (2015),

> In order for Community legislation to be better understood and correctly implemented, it is essential to ensure that it is well drafted. Acts adopted by the Community institutions must be drawn up in an intelligible and consistent manner, in accordance with uniform principles of presentation and legislative drafting, so that citizens and economic operators can identify their rights and obligations and the courts can enforce them, and so that, where necessary, the Member States can correctly transpose those acts in due time.

In fact, for every new EU translator, professional and institutional socialisation is largely a process of learning and internalising the rules and practices enshrined in the common norm sources, and the – largely juridical – way of thinking underlying them (Strandvik 2014a).

In addition to the common norm sources, the shared understanding of quality is maintained and reproduced interinstitutionally through the EU's technological resources and tools. Euramis, the central translation memory database, suggests memory segments – including normative ones – retrieved from earlier translations to be used in new ones. Similarly, the EU's terminology database IATE (InterActive Terminology for Europe) contains (normative) terminology fed and validated by the institutions' translation services. Further cooperation channels and fora include the European Institutions Linguistic Information Storage and Exchange[9] (ELISE) database, which supports rapid exchange of information on individual translations

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[9]http://ec.europa.eu/dpo-register/details.htm?id=35571

or translation packages amongst translators working on the same file, and the more formal Interinstitutional Committee for Translation and Interpretation (ICTI) which deals with more general issues of common interest to the various translation and interpretation services, including quality.

A significant driver of interinstitutional knowledge-sharing and cooperation on translation quality is increased contact between the different institutions. Since the entry into force of the Lisbon Treaty in 2009, the translation services and legal services of the European Parliament and the Council have worked in closer contact with each other in the context of the ordinary legislative procedure, coordinating the translation, revision, and finalisation work related to legislative proposals received from the Commission (Directorate-General for Translation 2010). Interinstitutional cooperation, and thereby negotiation and reproduction of common quality norms, also takes place through personal contacts and more or less formal language-specific groups. For example, soon after Finland joined the EU in 1995, Finnish translators and lawyer-linguists formed an informal Finnish language group to discuss problematic language- and terminology-related questions of common interest and to issue recommendations on jointly agreed solutions, preferences, and practices. The group, which consists of members from all Finnish translation units and legal services in the Institutions plus the EU Publications Office, still exists, though it now convenes less frequently (usually once a year) than during the early days of Finland's EU membership. Today, such networks are common practice in the EU language communities.

At the **intrainstitutional** level (i.e. internally within a single institution), the framework for ensuring a common and consistent approach to quality assurance is more detailed and complex.

Unlike the Council's *Manual of Precedents* mentioned above, there is no set of general multilingual guidelines at the Commission. There is, however, a common set of drafting rules, namely the *Drafters' Assistance Package* (DAP) developed by the Commission's Legal Service on the basis of the JPG and used as an electronic drafting aid. This internal tool offers step-by-step guidance on how to draft legal acts and provides useful links and suggested wordings but exists only in English and French. Several of the Commission's individual Directorates-General have their own drafting guidelines, such as DG Communication's *Guidelines for Press Material* and DG Trade's *DG Trade Communications Manual.* In these guidelines, the institution explains how it wants to communicate through different types of text. Besides the drafting language, the principles expressed in such guidelines also apply to translations (of press releases, competition documents, and so on).

Another Commission-wide quality effort is the Clear Writing Campaign launched in 2010 as a joint initiative by five Commission departments: the Secretariat-General, the Legal Service, DG Human Resources, DG Communication and DGT. The campaign features training and clear writing awards for drafters, among other measures. In 2011, it published a booklet entitled *How to write clearly* (European Commission 2015) to serve as a quick guide for administrative drafting in general. The guide has been translated and adapted into 22 official languages, so it has become a language-specific reference document for good writing.

The various guidelines mentioned above serve, above all, as technical reference materials: they define the textual and linguistic norms and conventions to be applied for legislative documents in particular, in order to write correctly and meet the EU standard. But they leave many quality-related questions unanswered, especially with regard to what good quality means in practice for text types/genres other than legislation, how good quality can be achieved and ensured, how quality should be monitored and assessed, and how efforts to guarantee quality should be reflected in the operations of the whole organisation (Strandvik 2014a).

4.1 DGT's Quality Management Model

In 2006, DGT launched a large-scale quality management project to address the challenges listed above. The project focused on processes relevant for the quality of translation services. More than 20 quality-related topics were identified and analysed, including pre-processing of texts for translation; translation briefs and feedback for freelancers; standards for the evaluation of freelance translations (including training, error quantification, and tools for evaluation); increased awareness about the nature and purpose of the texts to be translated; mapping of subject matter competence; contacts with experts within and outside the Commission; improvement of workflow tools for better capacity monitoring; collecting and soliciting feedback; and more structured approaches to quality management in each language department. Following this initiative, DGT launched a more comprehensive Total Quality Management project in 2008, during which all the relevant workflow processes of the organisation, not just those directly related to translation, were assessed by applying the Common Assessment Framework (CAF), a European quality management methodology for public sector organisations.[10] After several years of work, DGT presented a comprehensive three-layer quality management model (as shown in Fig. 1) consisting of:

1. An overall *DGT Quality Management Framework* (Directorate-General for Translation 2014). This document defines the key concepts and principles for quality management and outlines the structure of quality management-related work, including the main contributors and processes involved.
2. Two sets of Guidelines, which operationalise the DGT Quality Management Framework:

    (a) *DGT Translation Quality Guidelines* (Directorate-General for Translation 2015): a document providing guidance on translation, quality control and risk assessment; and

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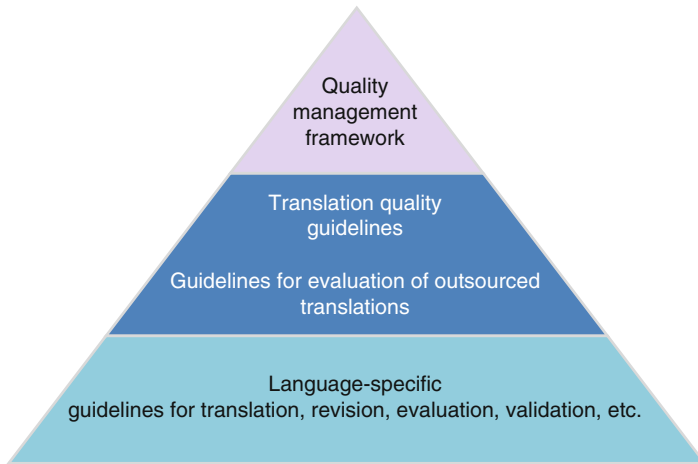[10]See http://www.eipa.eu/en/topic/show/&tid=191

Fig. 1 DGT's three-layer reference model for quality management

    (b) *Guidelines for evaluation of freelance translations* (Directorate-General for Translation 2016a): a document describing the process of evaluation, marking, and quality control of outsourced translations.

3. Various language-specific guidelines, drafted and maintained by the individual language departments, for translation, revision, evaluation, and so on.

The DGT Quality Management Framework builds on the EN 15038:2006 standard for translation services and adopts a clearly functionalist approach to translation quality. According to the Framework document:

> As regards delivery of products and services, the key quality concept at operational level is fitness for purpose ('suitability for purpose' as expressed in the standard of the translation service provision).
>
> A translation is fit for purpose when it is suitable for its intended communicative use and satisfies the expressed or implied needs and expectations of our direct customers (requesting DGs), our partners in the other EU institutions, the end-users and any other relevant stakeholders.

In this definition, translation is seen as a purpose-oriented activity which serves the needs and objectives of the Commission and its Directorates-General and, ultimately, the end users. Hence, the products of translation, the translations, are not independent objects with independent quality attributes but their quality is ultimately determined by how successfully they can be used to fulfil the requirements set by the processes and goals of the Commission and the EU at large.

The DGT Translation Quality Guidelines are an attempt at operationalising the functionalist approach defined in the DGT Quality Management Framework. They classify the EU documents typically submitted for translation into four main categories according to their use and purpose:

(a) legal documents;
(b) policy and administrative documents;
(c) information for the public;
(d) input for EU legislation, policy formulation and administration.

Based on the classification, each text category (divided into further sub-categories, as appropriate) is described, focusing on the purposes, legal statuses, and other characteristic features of these texts and the ensuing requirements for translation, the risks involved in cases of poor quality, aspects and issues that should receive particular attention in the translation process, and the recommended minimum level of quality control. The document categorisation and the descriptions are also used as part of the translation briefs provided to freelance translators.[11]

The Guidelines for evaluation of freelance translations aim to operationalise the principles defined in the DGT Quality Management Framework and the DGT Translation Quality Guidelines to ensure efficient, fair and consistent handling and evaluation of outsourced translations. They include practical instructions on quality requirements, error types, marking principles, quality marks and their distinctions, as well as on text samples to be evaluated and feedback to be given, to help in-house translators in their decisions when they act as evaluators. Outside the reference model for quality management, but closely linked to the evaluation guidelines, DGT also has a more comprehensive *Outsourcing framework* (Directorate-General for Translation 2016b). The Framework, which consists of several modules, addresses, among other things, key quality assurance aspects for outsourcing, such as ensuring quality through communication, more specifically through specifications, translation briefs, and feedback.

Finally, the language-specific guidelines include various documents and instruction materials produced and maintained at the language department level to establish standard linguistic practices in a specific language, to give guidance on recurring linguistic problems and to define preferred (and non-preferred) usages. Such specific guidelines are needed, because the aim of ensuring DGT-wide consistency of approach necessarily has its limits. Since languages differ in their structures and text type conventions and the challenges faced by translators (e.g. gender and cases), each language department must also provide guidelines and instructions according to the individual needs of their respective language: it would not make sense for English translators to use the same guidance on these issues as Italian translators. Moreover, since the overwhelming majority of Commission documents are now drafted in English as the source-language, DGT's English translators have an inverted document flow compared to the other languages. They translate most of the incoming documents that are used as input for the Commission's administrative, legislative, and monitoring work. The guidelines and instructions are hence not uniform across DGT's language departments.

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[11]https://ec.europa.eu/info/files/translation-resources-translation-quality-info-sheets-contractors_en

4.2   Practical Quality Management at DGT Level

Alongside the above guidelines provided to operationalise the principles expressed in the more abstract DGT Quality Management Framework, practical implementation of DGT's quality assurance takes place through human action, interaction, and processes at different organisational levels.[12] There are many contributors beyond the translators, both before texts reach the translators, and after they leave their hands (as shown in Fig. 2). The main ones include, first of all, management levels: **senior management** (Director-General, Deputy Director-General and Directors) sets and enables strategic objectives related to quality while **middle management** (heads of language departments and heads of translation units) has an important role to play in terms of risk assessment and allocation of resources to translation, quality control, and evaluation tasks. Other key actors are the four directorate-level **quality managers**. They coordinate, as a team, quality management actions at DGT level and deal with cross-cutting quality management initiatives, such as monitoring the implementation of the corporate quality management system and promoting a common understanding of quality-related issues. They also analyse individual departments' project reports and report on findings, advise senior management in quality matters, draft policy papers dealing with quality, maintain a web forum for quality-related matters, test quality assurance tools, and more. The quality managers work in a matrix structure together with the **quality officers** (see also Sect. 4.3), one per language department, who coordinate quality matters within their respective departments and cooperate with their counterparts in the other language departments, following up on incidents, ensuring that relevant knowledge sharing takes place, and carrying out joint projects, such as ex-post quality analyses[13] of translation samples (see also Castilho et al. and Lommel in this volume).

DGT's horizontal (non-translating) units and sectors also have a role to play in practical quality management. The **Editing Unit**, which edits some of the Commission's documents and texts at the drafting stage, helps to improve linguistic quality before texts are sent for translation. The **Demand Management Unit**, and its **Planning Sector** in particular, which acts as the interface between DGT's clients (i.e. the Commission Directorates-General requesting translations) and the language departments, has a key role in negotiating sustainable translation deadlines, assuring the technical quality of source documents, and acquiring relevant background information related to translation requests – all prerequisites for high-quality translations. **DGT's Corrigenda Sector**, also placed under the Demand

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[12]See DGT's organisation chart at https://ec.europa.eu/info/departments/translation_en

[13]'Ex-post quality analysis' refers to post-production analyses of translations after they have left DGT. Typically, a sample of translations is collected, and a certain number of pages are analysed to examine various aspects of quality. Different quality aspects may be focused on from one analysis to another.
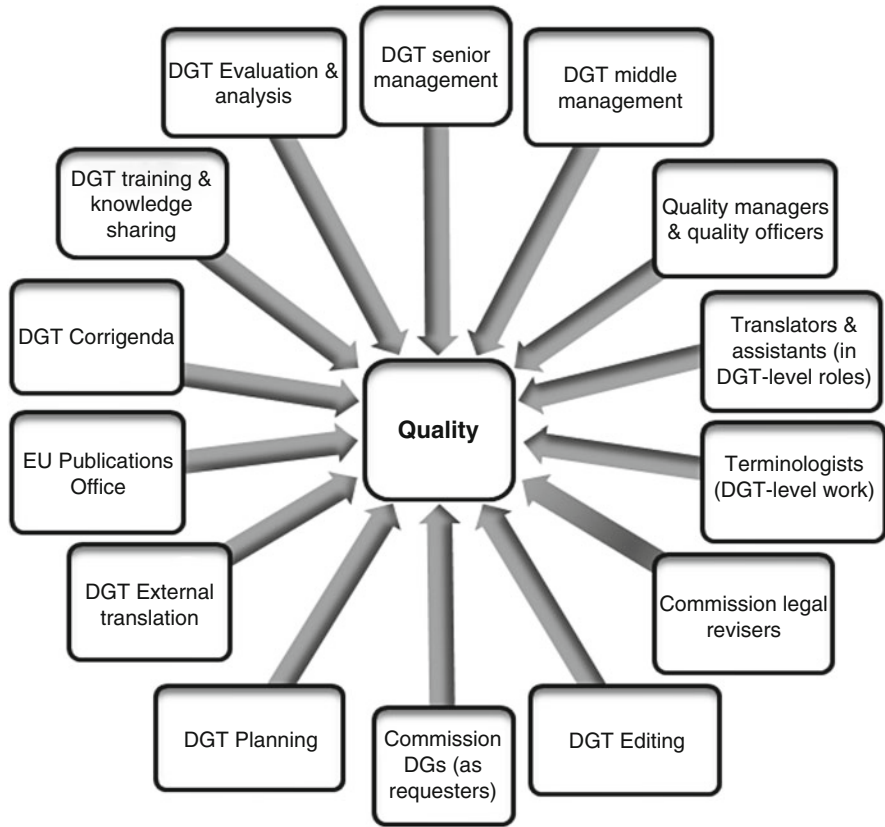
Fig. 2 Quality management at DGT level: potential contributors

Management Unit, has responsibility for corrigenda and correcting acts.[14] In addition to handling corrigenda requests, it drafts regular reports on the corrigenda cases and their numbers, organises meetings with the language departments' corrigenda correspondents and may bring up recurrent quality issues and give recommendations. The **External Translation Unit** deals with external contractors, also in matters related to (non-optimal) quality. The **Evaluation and Analysis Unit** conducts business process analyses and suggests areas for improvement. The unit runs regular customer satisfaction surveys among DGT's clients and also collects

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[14]A *corrigendum* is a formal document (a list of errors and their corrections), used to correct a legal act or other official document or their translations, when the errors detected do not affect the essential substance of the adopted act or document (in other words when they are non-substantive, e.g. because they are obvious). When the errors detected *do* affect the substance of an act (i.e. are substantive), a *correcting act* must usually be drafted. In such cases, an adoption procedure similar to that applied when the act was initially adopted must be followed.

data on so-called unsolicited general feedback, i.e. feedback on DGT's translations sent by stakeholders, such as national authorities, other EU institutions, businesses or private citizens on their own initiative, without any specific request by DGT or the Commission as part of the standard drafting/legislative process. DGT **staff in charge of training and knowledge sharing**, including DGT Library, help organise training events and, more generally, provide for knowledge resources and *domain competence management*, in collaboration with senior and middle management and the translation departments. Domain competence, in this context, includes both knowledge of the Commission's policies and EU legislation and knowledge of specific fields (such as chemistry or economics), and is considered important for translation efficiency and the avoidance of errors especially in cases of highly technical or unclear source texts (Directorate-General for Translation 2017).

The most relevant individual staff roles in relation to practical quality management are naturally linked to translation activities, but also to training and specialist skills. **Translators and assistants** act at the DGT level in quality-related tasks such as freelance correspondents, training correspondents, corrigenda correspondents, language technology correspondents, lead translators (i.e. file coordinators for important translation files), performers of joint technical quality checks, and a host of *ad hoc* activities (e.g. as members of working groups). **Terminologists**, in cooperation with DGT's **Terminology Coordination Unit**, carry out DGT-wide common terminology projects and ensure the reliability of the joint IATE terminology database. Last but certainly not least, as an external party, the **legal revisers** in the Commission's Legal Service monitor whether the 'originals' comply with the legislative drafting guidelines before translation, revise some of DGT's translations, provide translation models and templates for legislative documents, and give advice in cases of translation problems with (potential) legal implications. Finally, an external role in quality control is also played by the **requesting Directorates-General** and the by the **EU's Publications Office**. DGs may ask internal or external experts to revise the translated language versions, and the Publications Office's proof-readers check legal acts and other documents and written materials before publication, eliminating spelling errors, formatting problems and obvious linguistic errors.

4.3 Practical Quality Management in DGT's Language Departments and Translation Units

Practical quality management involves processes as well as roles and responsibilities, as outlined in the previous section. Quality management and assurance measures at the level of individual language departments and translation units can take many forms, depending on the specific situation of each department/unit. We now outline the typical minimum procedures, shown graphically in Fig. 3. First, as would be expected, is the aspect of quality management many non-specialists
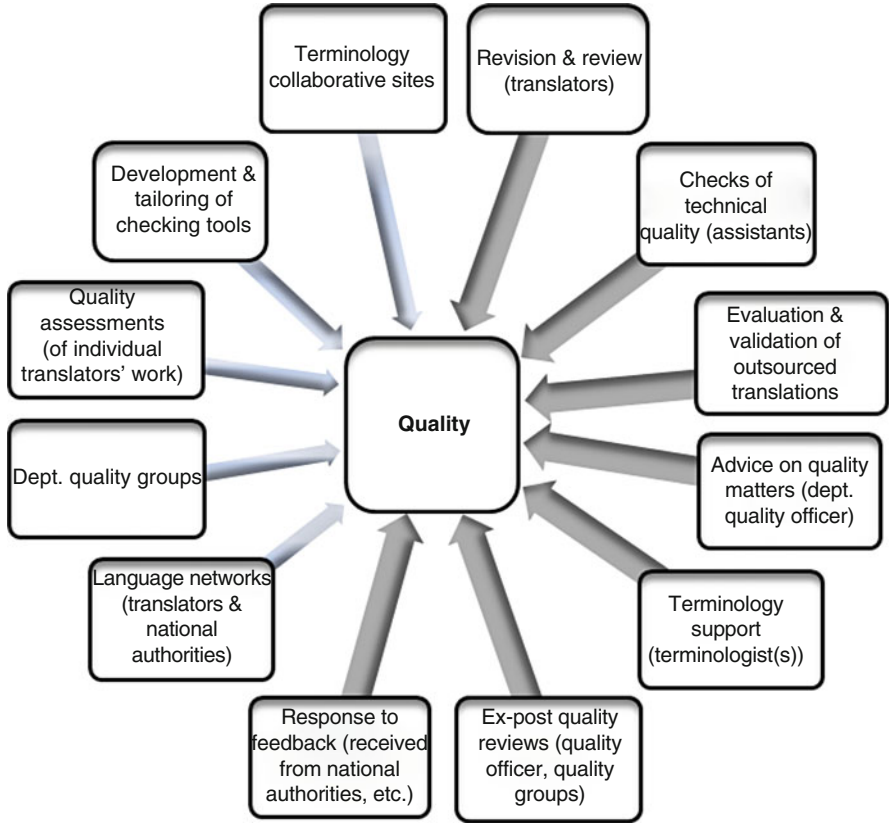
Terminology collaborative sites

Revision & review (translators)

Development & tailoring of checking tools

Checks of technical quality (assistants)

Quality assessments (of individual translators' work)

Quality

Evaluation & validation of outsourced translations

Dept. quality groups

Advice on quality matters (dept. quality officer)

Language networks (translators & national authorities)

Terminology support (terminologist(s))

Response to feedback (received from national authorities, etc.)

Ex-post quality reviews (quality officer, quality groups)

Fig. 3 Quality management in DGT's language departments and translation units: measures, processes and contributors

recognise as relevant, namely **revision and review of translations**. The translations produced are systematically quality-controlled, usually by fellow translators but in some exceptional cases also by external (national) experts. The quality control may be carried out using variable combinations of comparative revision and target-text-focused review. The decisions concerning the quality control to be applied are made on the basis of risk assessments, mainly by the heads of translation units. In cases where the risks are considered minor (e.g. where a translation is intended for internal use only, or it is largely based on earlier, quality-checked translations or model translations/templates), quality control may be done with a lighter touch. Revision and review also have a training and knowledge sharing function, especially for the benefit of new translators and trainees, as well as for those having to translate texts with unfamiliar subject matters. **Checks of the technical quality of translations** are in addition to revision and review. These are made mainly by assistants, observing specific checklists for technical details, such as formats, numbering and integrity of content, that have to be in order in the finalised translation.

Another element of quality management which might be expected to figure prominently in any organisation which outsources a significant percentage of the translation task is **evaluation and validation of outsourced translations**. A sample of every outsourced translation submitted by any external contractor is evaluated by an in-house translator to verify whether the language department has received a product that meets the quality requirements set in DGT's tender specifications.[15] In the evaluation, the translation is examined with regard to a set of quality attributes (see Sect. 5.1). The evaluation is then validated by one of the department's validators to ensure fair and consistent marking, and feedback is provided to the external contractor. The marks given are taken into account in the ranking of the contractor on the list of contractors, calculated according to a dynamic ranking system determining the order in which translation assignments are offered to the contractors. The language department's freelance correspondent monitors the average quality marks and developments in the ranking.

All language departments in DGT must nominate a quality officer who coordinates quality-related matters and, depending on the department's needs and the person's competence profile, gives **advice and support** to translators **on linguistic and quality-related matters**, analyses issues related to quality (also in cooperation with national experts), drafts language-specific recommendations and guidelines and posts and updates them on the department's intranet website, and gives or organises quality-related training within the department. Moreover, every DGT translation department must allocate at least the equivalent of two full-time members of staff in resources per year to **terminology support**, one of them by a full-time terminologist. Translators usually send terminology enquiries to the department's main terminologist who then consults sources and experts to find a solution to the problem. The results of such discussions and consultations are fed into the IATE terminology database, as appropriate, to ensure correct and uniform usage.

Ex-post quality reviews conducted within the language department are more or less regular post-production analyses of various quality aspects of samples of texts translated and revised in the translation units. The findings of the quality reviews are reported on, and training events may be organised to follow up on them; similar analyses may also be carried out as joint projects involving all DGT language departments. **Response to quality-related feedback** is distinct from such quality reviews because it is based on feedback such as corrigenda and correction requests or comments, suggestions or criticisms received from clients (requesting DGs), end users of translations (e.g. national authorities) or other stakeholders in conjunction with the translation/legislative process. The feedback is dealt with according to standard procedures and, if necessary, steps are taken to put the matter right. It also includes the so called unsolicited general feedback (see Sect. 4.2 above).

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[15]DGT's outsourcing is based on multiannual framework contracts concluded with external contractors. The contracts result from a tendering procedure in which a set of tender specifications defined by DGT are applied. In the tendering process, aspiring contractors' offers are assessed as a function of the quality of the service proposed and the price quoted, with a weighting of 70% for quality and 30% for price.

In addition to the standard measures listed above, DGT's individual language departments may carry out a number of supplementary activities aimed at assuring and maintaining quality, according to their specific situations and needs (the list here is not exhaustive). They often create **networks between EU translators and national authorities**, such as ministries, specialised agencies, academic institutions, expert bodies, or language authorities. Depending on the language and country in question, such networks may have varying degrees of formality and focus on more general cooperation in language matters or everyday exchange of information on matters of terminology, linguistic questions, or quality-related feedback. As examples of such initiatives, the Swedish and Finnish networks of cooperation and feedback may be mentioned, both having informal, non-hierarchical, but well-organised structures. In addition, language departments may have bilateral relations and contacts, e.g. in matters of terminology and quality assurance, with external experts or specialised national agencies dealing with individual policy sectors, such as aviation, food safety, safety of medicinal products, or financial supervision. Alongside these external expert links, the establishment of **departmental quality groups** supports quality internally. Such groups may exist on a permanent basis or be formed for *ad hoc* assignments. They may, for instance, conduct quality-related analyses, identify and record good practices for quality assurance, or help draft translation guidelines for certain text types or genres. They may also act as consultative bodies, for example by commenting on new linguistic recommendations, guidelines or model translations.

Language departments may also carry out **assessments of the quality of individual translators' work**. Translations produced by in-house translators may be subjected to regular quality assessment carried out by the quality officer or a head of unit or department, as part of the Commission's annual career appraisal process and in order to monitor the overall level of quality of the work done within the translation department.

Tools and resources figure at departmental level as well as at DGT, institutional or interinstitutional levels. Departments may take responsibility for tool-related training or for the **development and tailoring of checking tools**, for example applications developed to detect frequent errors in translations (e.g. deviations in certain standard expressions or dates and numbers). The development and tailoring is typically language-specific as some languages lend themselves to error checking more easily than others.

To help to achieve consistency of terminology, **departmental terminology wikis** may be set up as collaborative sites for discussing and recording terminology and references during individual translation assignments. Such terminology wikis may then be made available to the translation services of other institutions for their further work on the same document or document package and the terms may be validated and fed into the IATE terminology database.

4.4 Consistency of Approach: Challenges

As we have seen, translation and quality assurance, which at first sight might seem to be rather straightforward institutional operations, actually involve a multitude of different processes. The multi-layered quality management system described above includes a large number of different principles, guidelines, procedures, workflows, and participants contributing to the overall goal. The assumption is that when the rules, principles, and practices are adhered to, and everyone involved in the different processes works correctly and according to agreed standards, good quality will be achieved. One of the key elements in the system is therefore constant *coordination* between the processes and the participants. Without it, the required efficiency, uniformity, and consistency would inevitably be lost.

One of the challenges for the current framework is to ensure sufficient communication and coordination between the numerous participants in the processes. To address this issue within the Commission, DGT has created a system with lead translators, who act as file coordinators or project managers for important translation files, channelling and centralising the communication between all translators and the requester. For major files, such as large translation packages with hundreds of pages, a multitude of questions may be channelled from the translators to the requesters. As an illustration, in the context of a recent package, more than 300 questions were sent to the authors. The replies received from them provided the expert clarifications the translators needed to carry out the work with a common understanding of the source text. A third of the questions led to corrections in the source text and to new document versions, while another third had to do with issues that did not warrant corrections or new versions. A major challenge is also to ensure that this information flow is not hampered when texts are outsourced.

In the interinstitutional setup, the challenges may multiply. For instance, in the ordinary legislative procedure, the following actors are typically involved as a minimum: drafters/translation requesters in the Commission Directorate-General in charge of the legislative proposal; the Commission's Legal Service; DGT Planning (which receives and transmits further the translation assignment); assistants, translators, revisers, and terminologists in DGT translation units; national experts (consulted in case of need or commenting on translations at the preparatory stage); the Commission's Secretariat General (which transfers the translated documents to other institutions); translators, terminologists, assistants and other administrators in the European Parliament and the Council; lawyer-linguists in the Parliament and the Council; Members of Parliament (in the European Parliament) and national authorities and their representatives (in the Council) negotiating the final version of the act to be adopted; and the Publications Office. If, for instance, changes that Parliament/Council lawyer-linguists working 'downstream' in the process make in translations – possibly because of demands made by national authorities – do not come to the attention of the translators/revisers further 'upstream', the same errors or non-preferred usages may be repeated over and over again. A case from one language department provides a telling example: the name of a new EU

initiative was coined by the language department in DGT after consultations with all institutions. However, when the document reached the Council and Parliament a year later, national authorities proposed another name to the lawyer-linguists. Since the proposed alternative name was fully correct and possible, it was accepted and became the formal denomination. In the meantime, though, more than 300 other documents, featuring the name which had been agreed on initially, had been translated. They were now outdated as far as the name of the initiative was concerned. All relevant information concerning the initial process of establishing the name had been duly documented in the ELISE database, which follows all interinstitutional files throughout the workflow, but because of time pressure the database was not consulted at later stages.

Secondly, documents or texts may bypass DGT and the standard quality assurance processes, if those who need translations decide to produce or outsource them themselves. In Commission Directorates-General, translations are sometimes requested from their own in-house staff with a knowledge of the target-language (but not necessarily any experience in translation), or, if speakers of the target-language are not available, MT may be used, sometimes with no subsequent quality control or post-editing. Similarly, materials to be translated may be sent to external translation service providers without DGT playing any role in the process, and the self-outsourced translations may not be subject to any quality control. The results may thus deviate considerably from the normal quality standards of the Commission. Sometimes, end products from such self-translation/outsourcing may be combined with other texts translated earlier by the institution's own translation service (for instance on websites), and the result may be patchy, inconsistent, and often difficult to correct afterwards.

In more general terms, basically any translation intervention which bypasses the standard processes and/or is unforeseen and unannounced poses a significant quality risk. This is illustrated well by cases in which, to achieve efficiency gains, those needing translations are increasingly tempted to use automatically generated translations for snippets of text that occur frequently in different documents and contexts. Such snippets may include, for instance, dates to be inserted into texts, or words, headings or labels for web pages. The 'universal' translations to be used for automatic generation may be created by either having them first translated by the institution's translation service, as ordinary translation assignments, and then storing them for future use, or by extracting them from existing translations. However, their inherent problem is, besides that of possibly extracting wrong forms in the first place, the unpredictability of their future uses: through automatic generation the translations may end up in contexts where they do not fit at all. And since the automatic generation takes place outside DGT, the end results cannot usually be checked by translators, so they are largely uncontrollable and can only be corrected afterwards, and not necessarily even then. A non-standard approach poses risks for any language, but especially for the case-rich, agglutinative, and inflectional ones, such as Hungarian, Estonian, or Finnish, which tolerate automatic generation of text elements very badly. Increasing use of MT could lead to a further escalation of this problem.

A third challenge is the tension between harmonisation and flexibility. In a workflow with so many processes, tools, participants, and large translation volumes, there is a natural and well-founded wish to harmonise processes and working methods. However, as Mossop (2007) says, translation and revision are not rule-based activities. Instead, they are activities based on principles, and principles are things you do, unless there is a reason to do something else. The interactions between the various participants take place if there is a need for them to take place. If a translator has a doubt, he or she consults the terminologist, the quality officer, the requester, the lawyer-linguists, or a colleague, depending on a number of things that may not be easily harmonised in an efficient way. What gives rise to a problem in one language might not be an issue in other languages. Competence profiles of the people involved may vary (domain competence, IT competence, etc.). Language departments may be more or less able to access experts in national administrations for terminology inquiries. Freelance markets are not the same, neither in size nor in maturity. In other words, an efficient translation workflow is not a standardised linear workflow, but one where certain processes are activated only if and when they are needed and readily available.

5   Consistency of Quality

What remains to be discussed is how translation quality is evaluated and managed in practice across DGT and its language pairs. How can consistent quality be attained across two dozen languages? To understand this, and the challenges involved, we need to have a look at DGT's translation quality assessment model.

5.1   DGT's Model for Translation Quality Assessment

According to DGT's mission statement, DGT provides the Commission with high-quality translation. The specifications of what this means in practice are laid down in the DGT Translation Quality Guidelines described above. The basic quality requirements are also presented in a compact form in the tender specifications[16] for DGT's most recent call for tenders for outsourced translations (OMNIBUS-15). According to the specifications,

> The quality of the translations must be such that they can be used as they stand upon delivery, without any further formatting, revision, review and/or correction by the contracting authority.
>
> To this end, the contractor must thoroughly revise and review the entire target text, ensuring inter alia that:

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[16]https://infoeuropa.eurocid.pt/files/database/000064001-000065000/000064078_2.pdf

		Relevance	
Error type	Code	Low	High
Mistranslation + unjustified addition	SENS		
Unjustified omission or non-translation	OM		
Wrong or inconsistent EU usage or terminology	TERM		
Reference documents/material not used; norm sources or job-specific instructions not adhered to	RD		
Clarity, register and text-type conventions	CL		
Grammar	GR		
Punctuation	PT		
Spelling	SP		

Table 1 DGT's quality grid

- it is complete (without unjustified omissions or additions);
- it is an accurate and consistent rendering of the source text;
- references to documents already published have been checked and quoted correctly;
- the terminology and lexis are consistent with any relevant reference material and internally;
- appropriate attention has been paid to the clarity and register and text-type conventions;
- it contains no syntactical, spelling, punctuation, typographical, grammatical or other errors;
- the formatting of the original has been maintained (including codes and tags if applicable);
- any specific instructions given by the authorising department are followed; and
- the agreed deadline (date and time) is scrupulously respected.

As for linguistic and textual quality, the aspects of quality listed reflect the following quality grid used by DGT (Table 1).

A distinction is made between 'low-relevance' and 'high-relevance' errors, a high-relevance error being one that seriously compromises the usability of the text for its intended purpose.

In addition to the aspects of quality listed in the table, EU translations have a further 'institutional' quality requirement, namely that of equivalence or consistency between (or equal value of) all language versions. In the EU (legislative) context, this equivalence has also been termed 'multilingual concordance' or 'multilingual consistency', in order to describe a situation where there are a number of language versions (instead of only one source text and one target text) which may have different linguistic equivalence relations vis-à-vis the source text and vis-à-vis each other, but which should still produce the same legal effect.

5.2 Consistency of Quality: Challenges

As with the consistency of approach, the basic assumption is that if the above-mentioned linguistic and textual quality requirements are perceived and observed

in an appropriate and coherent manner by all those involved, there will be good and consistent quality. This is, of course, possible only if the translation demand and the organisation's resources match each other. If translators do not have time to read through their translations before sending them to revision and/or if quality assurance and control procedures must be skipped altogether or reduced significantly due to workload, consistency of quality is at risk. With the high translation demand in the Commission and diminishing translation resources, it is a real challenge to carry out workflow and translation processes in such a way that efficiency gains are achieved without professional working methods being distorted (Strandvik 2018). Similarly, if the domain competence required by specific translation jobs does not exist or cannot be allocated, consistency of quality may be difficult to achieve, or assess. And further, increased outsourcing may also contribute to such risks. For instance, in-house field-specific domain competence may be gradually lost if all or most of the documents dealing with a particular field are systematically outsourced. This, in turn, may entail difficulties in maintaining consistency of quality through the evaluation and revision of the outsourced translations.

The multilingual and multicultural organisation also presents certain in-built challenges. While language-specific aspects of quality (such as grammar, punctuation, and spelling) are relatively clear-cut, others are more vague (in particular clarity, sense, and omission). For instance, what is considered clear writing in one target culture may not coincide with the clarity ideals of another. Norms and conventions of good administrative language, as reflected in sentence and paragraph lengths and structures, use of rhetorical devices and such, are very different in, say, Sweden and France (Strandvik 2012). Pym (2000), trying to explain debates in the Finnish press concerning the EU and its (presumed negative) effects on the Finnish language after Finland's accession to the EU in 1995, even suggests that there is a:

> significant divide here between the north and south of Europe, and more especially along the lines of partition brought about by the sixteenth-century Reformation and Counter-Reformation. Protestant Europe has long sought to bring the word of authority close to the language of the people; it has long encouraged the individual to reason with the law alone. Catholic Europe, on the other hand, has traditionally understood sacred texts through a mediating institution; it is relatively unperturbed by the idea that priest-like experts might exist for the interpretation and application of complex language. The analogy is perhaps forced. But it does point to the depth of the traditions involved.

The fact that translators from different countries have different training backgrounds may also play a role. For instance, when Greece joined the EU in 1981, there was no translator training available in the country. As a result, many of the Greek translators recruited by the EU came from engineering backgrounds. Similarly, in some countries, Translation Studies has a long history as an independent academic discipline whereas in others it has traditionally been a sub-component of philology (Biel 2011). This may have an impact on translators' perceptions as to their role, task and room for manoeuvre as mediators and communicators (linguistics-based/source-text-oriented vs. functionalist/target-text-oriented paradigm). Different perceptions and attitudes can have an impact on multilingual consistency, as translators may approach their task with different

preconceptions and mind-sets. They may also be the source of differing views on what constitutes a high-relevance error, e.g. in terms of what translators can add to or take away from a text (cf. Pym 2000). Similarly, these differences may affect 'professional visions' of whether translators, in their translation approach and strategies, should look rather inward towards their institutions or outward towards the users and receivers of their translations (*ibid.*; see also Suojanen et al. 2014).

One factor that is challenging for the consistency of quality is that the EU's legislative translations, on the one hand, and its other translations, in particular those of more informative and persuasive texts targeted at the public, on the other, have to meet different demands. While legislative translations, aiming at the same legal effect, have to conform to strict norms with regard to form and content, translations of other texts can – and actually should (see DGT Translation Quality Guidelines) – pursue their intended effects with a more varied set of tools, particularly with regard to form but also, to some extent, to content elements (localisation). If in the case of the latter, different approaches are adopted in different language pairs, so that in some language pairs a strategic decision is made to stick very close to the source text in all its aspects, but others choose a more target-oriented and text-manipulative approach, then consistency of quality between the language versions may not be achieved. An attempt to reproduce the source text form and content as fully as possible may also result in what might be called 'synoptic equivalence'. Synoptic equivalence means that on the surface a language version may look very much the same as the source text but, exactly for this reason, it may differ considerably as to the extent that it achieves the intended communicative effect in comparison with the source text. Attempts to ensure such synoptic equivalence are then potentially counter-productive, as they may prefer formal correspondence to effective communication through translation. Related to the above, the EU's language regime also creates a somewhat tricky situation in that the same translation may have to serve more than one member state (for instance French translations serve France and Belgium). This means that some language versions can be tailored less to local needs than others, which may have an effect on multilingual consistency.

It is also worth noting that in certain situations different EU translation norms may be in conflict with each other, and this may have an effect on quality. A case in point is the so-called *sentence rule* which is applied in EU legislative translation. According to the rule, the sentence boundaries in the enacting terms (articles) of a legal act must be the same in all its language versions. This facilitates later references to the provisions of the act. But it also means that a conflict with the quality dimension 'clarity' may emerge, if the source text includes (excessively) long sentences. At the same time, as typical and recommended sentence lengths vary in different national (legal) languages, the forced reproduction of the sentence boundaries in all language versions is potentially conducive to inconsistency of quality.

Finally, technical constraints may manifest themselves in consistency of quality issues. For example, translating an EU text, such as a Commission press release, in the current XML format may effectively limit certain textual operations needed

to optimise quality in certain languages, or at least make such optimisation more difficult. As the limiting effects on different languages may vary, inconsistency of quality may ensue. Similarly, new content types and content management systems may have a 'decontextualisation effect', forcing translators to work on isolated strings of text instead of coherent wholes (see Drugan 2013). This, too, may have different consequences for different languages in terms of quality.

6 The Impact and Implications of Translation Quality Management

These issues and challenges, and the associated response by DGT (i.e. the adoption of a translation quality management policy) have effects beyond translation quality alone. In such a large diverse multilingual and multicultural workplace 'ecosystem', introducing any wide-ranging policy on management of course has significant consequences, both intended and unforeseen. The DGT translation quality management approach also raises questions relating to ethics, economics, politics, technology, professionalism, culture, and values. Significant questions include the implications for individual translators; issues relating to their agency,[17] power, and status within the EU institutions; issues relating to agency, power, and status beyond the EU in the wider translation industry; and ultimately questions of culture, values, and professionalism. Some of the most important are now briefly discussed from the bottom up, i.e. from the individual translator, to the EU institutions, to the translation industry generally, and finally to professional culture and values.

What does a consistent policy on translation quality management mean for individual translators' experiences of working for the EU institutions? Based on the discussion in the previous sections, it could be concluded that DGT's quality management policy empowers and motivates translators by giving them opportunities and responsibilities for taking action to ensure, maintain or improve quality (including through acting in different quality-related roles). The fact that most translations do not undergo any further quality control in the requesting Commission Directorates-General after they leave DGT is also likely to add to translators' ownership and responsibility. But at the same time, the comprehensive quality framework, with its strict norms, conventions, and standard procedures and processes, obviously limits translators' margin for manoeuvre.

Some likely outcomes are suggested by evidence from large-scale empirical studies of Total Quality Management approaches across a broad range of industries and sectors, though these have not thus far included the translation industry. Early research on the effects of Total Quality Management concentrated on the

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[17]Buzelin defines agency in general terms as "the ability to exert power in an intentional way" (2011). Kinnunen and Koskinen define it as "willingness and ability to act" (2010). See also Moorkens (2017) for a discussion of freelance translators' agency.

organisational level, assessing productivity, operational performance, and financial aspects (Agus and Abdullah 2000; Nair 2006). However, more recent work has shifted the focus to the individual. Studies have measured how Total Quality Management affects staff workloads, sense of belonging, stress and well-being, for example (Liu and Liu 2012). This work has found not only the improved quality and efficiency which might have been expected, but also: enhanced staff well-being, particularly where "team- and empowerment-oriented" TQM practices are chosen; an increased sense of well-being related to job satisfaction when staff have responsibility for promoting TQM practices; the creation of a "climate of communication in the workplace", due to the greater levels of interaction and feedback among workers required by TQM approaches; and at the higher level, greater "autonomy, meaningfulness and connectedness" (see Liu and Liu 2012 for a summary of these findings across multiple studies). These impacts were observed even though staff were found to work harder under TQM approaches.

However, the various studies which Liu and Liu assessed to identify these broad findings focused on *employees*. As we note above, a significant and growing proportion of translation work in the EU institutions is outsourced and thus performed by freelance workers, who may have no direct connection to the institutions if the work is further subcontracted by an external translation service provider, the standard industry model. In a context where management of translation quality is formalised and operationalised as outlined above, there is asymmetric access to understanding of the quality management policy among freelance and in-house, or novice and experienced translators. What is each individual's place in the quality management ecosystem and do they always understand this? Or even, in the case of freelance providers, know that the quality management policy exists? What access do freelance translators have to quality management processes and policy? An important feature of TQM approaches is the feedback loop, so that the policy evolves based on learning from practice and as practice itself changes; but this depends here on the inclusion of a large cohort of freelance translators, who may be well-placed to provide relevant feedback (for example, translators working for the EU on a freelance basis may have decades of high-level experience working for the institutions or even be former in-house translators). What do elements such as consistency of approach mean in practice for those who deliver it via their individual translations? Who makes decisions where conflicts arise? For instance, when questions of cost or efficiency come into conflict with translators' concerns around time or translation quality, does the common approach to quality management help in adjudicating or have a role in protecting quality standards? Empirical studies of TQM approaches have also repeatedly emphasised the importance of co-worker support for effective implementation (e.g. Joiner 2007), but freelance translators typically work remotely and with little if any contact with their peers or in-house staff: how can they access such 'co-worker' support? In a discussion of general freelance translation contexts, Moorkens (2017) links freelance translators' general lack of supportive co-workers to lowered social capital, and hence lower job and life satisfaction, and subjective well-being. It is not clear whether TQM approaches can or do make an impact on this less positive broader setting. These questions

do not have clear or uniform answers but highlight areas for further research and development of TQM approaches in evolving work contexts.

Moving up a level from the individual translator to consider the broader context within the institutions, questions of status, power and agency are present in relation to the translation quality management policy. An empirical study by Dam and Korning Zethsen (2008) singled out EU translators as those who may have an "assumed higher status" in a profession which was more generally considered low-status, including by translators themselves. Translator power and influence were assessed by asking in-house translators and other employees in Denmark to state whether they had, or might be expected to attain, "an executive office or managerial position" (*ibid.*). The EU institutions' development of more powerful roles in quality management might support the hypothesis of "assumed higher status" in these terms. However, power and influence at the EU must also be seen in the broader context of the status of translators and quality managers in relation to multiple other (powerful) actors such as lawyer-linguists, elected representatives, or officials in national administrations. As outlined above, translators' choices and decisions are subject to review and can be overridden by lawyer-linguists, among others. Not only this, but the strong institutional history and existence of approved prior translations and reference documents mean that translators must accept recognised translations that are not necessarily their own preferred version. Of course, this is no different to most other professional translation contexts; but it can clearly come into conflict with a strong emphasis on translation quality. Here we see a good illustration of how translation quality is not absolute, but can be viewed differently at the level of the individual and of the system. For instance, in a given individual translation situation, it may be fully justified to accept a choice or solution which is not ideal in terms of quality, because doing something else, and thereby deviating from earlier usage or practice, could eventually lead to a more serious quality issue. Strandvik (2014b) describes how different actors in the workflow have different needs and expectations, and hence different views on what translation quality is. Dollerup (2001) highlights a further question of status which is relevant for quality at the institutional level: the different statuses of EU languages, with 'official', 'working', and 'other' languages and, arguably, English as an exceptional case. How do the different internal statuses of EU languages play out in practice in relation to the 'no original' and 'equivalent value' principles for legislative texts, and how can a broad translation quality management policy handle any conflicts which arise here?

Moving up one step further, to the level of the translation industry more generally, other questions of status, power and agency arise, particularly in relation to outsourcing. In common with many other sectors, translation is increasingly subject to the drive to outsource provision of services, and the EU institutions too are sending out a large and growing proportion of translation work. The logic of such changes may seem apparent, for maintaining large in-house divisions is expensive whereas outsourced models pass substantial costs (e.g. equipment, holiday pay) on to the providers. The outsourcing model can have undesirable and hard-to-predict effects for quality, however, and can thus come into conflict with the quality management approach. As an example, it makes sense for organisations to outsource

translation provision in terms of cost and, to some extent, administration upstream; but this has consequences downstream for assessment and control of translation quality. In-house staff must spend increasing time away from producing their own translations to monitor and check other providers' work, among other effects. This means internal expertise and motivation (and hence, quality) can be placed at risk in the longer term, making it all the more important that attention continues to be focused on quality management at the strategic level so that unforeseen side-effects or new issues can be spotted and addressed as they transpire.

What impact does quality management have at the more abstract level of professional culture and values? Although there is little research in relation to quality management in the translation industry, several decades of research into the effects of TQM in management and business studies contexts indicate some potentially relevant findings here (e.g. Adam et al. 1997; Kaynak 2003). A leading empirical evaluation of the effects of TQM across multiple sectors and organisations concluded that the three TQM practices which have direct effects on operating performance were supplier quality management, product/service design, and process management (Kaynak 2003).[18] Performance was also affected by management leadership, training, employee relations, and quality data and reporting, and by 'top-down' approaches, with researchers stressing that "Quality should not be directed from the outside the individual and the organisational unit, but inside both of them" (Lee and Lazarus 2007).

In DGT, processes and their actors are critical in achieving this 'insider' direction. As Strandvik has argued (2014a), "roles might be clear-cut in theory but overlap in practice", so "the different actors quite heavily depend on each other for the end product to be of high quality". The very fact of formally paying attention to quality management, and having dedicated quality managers and quality officers whose role and responsibility it is, sends a clear signal of high-level encouragement of a professional culture, developing and supporting a strong community of practice. There is space to discuss strategic challenges and review the effects of responding to them; for instance, do measures work as intended, and if not, what might work better? This speaks to debates in Translation Studies around the need for greater professionalisation or even regulation of the sector (e.g. Gouadec 2010), and provides hope that the isolated freelance translator may be better integrated in a coherent community, including resources, support, feedback loops with associated opportunities for ongoing self-development, and recognition of their contribution. Agency in this view is not the preserve of the translator, but shared by other important parties including drafters of legislative texts, quality managers who see the bigger picture across the institutions, and ultimately translation users (cf. work by Suojanen et al. (2014) on User-Centred Translation), particularly appropriate in the democratic EU context.

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[18]In DGT terms, this would mean translation supplier management, translation/translation service design, and translation process management.

The EU has a leading role to play at this higher level of professional values and ethics. In a context of increased outsourcing, an emphasis on translation quality management offers a way to balance rational deployment of limited resources, quality, and professionalism. One indication of the EU institutions' values is that, in their outsourcing tenders, they emphasise quality over price, as witnessed by the Commission's (DGT's) quality/price weighting of 70/30 (see footnote 15). A quality management strategy can also deliberately address some negative effects of the way the industry is increasingly structured. For example, in a situation where public sector contracts are being dominated by a very small number of huge Language Service Providers, the European Court of Justice explicitly offers opportunities for individual freelancers, in addition to larger LSPs. Currently, 80% of their external providers are in fact individual translators, without intermediaries. Another case in point, outside the EU, is translation tenders published by the Swiss Federal Chancellery which have for many years observed a minimum price level. Any bids below this stipulated price level are excluded as ineligible. TQM approaches also emphasise the importance of communication between suppliers, clients, employees, and managers, and so they may offer effective ways to introduce greater peer (if not directly 'co-worker') support for freelance translators as feedback loops develop over time. Achieving this would be directly in line with TQM goals and likely to have positive effects on translation quality, as Kayak concludes (2003) (translations being the relevant 'material' here):

> Establishing an effective system for collecting and disseminating quality data throughout the organisation in a timely manner is necessary to realise improvements in supplier quality management, product/service design, and process management. Then, firms can focus on developing cooperative relationships with their suppliers to improve the quality of incoming materials and to involve them in the buyer firms' product/service design and process management activities. Coordination and cooperation among employees who participate in product/service design and process management are essential to improving quality performance of firms.

One recent example of such good practices is the VW Language service which was awarded the German Hieronymus Prize in 2014, precisely in recognition of its supplier management model.[19]

Last, but not least, in a context of competing online sources of (dis)information, political opposition to the very idea of the EU, and populist media with an anti-EU agenda and deep pockets, there is a greater need than ever to communicate the EU project to citizens as effectively as possible. This will of course have to be achieved through quality translations.

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[19]See   http://bdue.de/de/fuer-presse-medien/presseinformationen/pm-detail/auszeichnung-vw-erhaelt-bdue-hieronymus-preis-2014/

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