TRANSLATION AND EDITING POLICY GUIDELINES:
A SOUTH AFRICAN EXPERIENCE

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Abstract

Although translation policy is crucial in language policy, it is however, understudied in many countries. This understudy unfortunately is an international phenomenon, touching many cultures and countries including the Republic of South Africa. To further support this argument, scholars such as Sandrini (2016) contend that it is only recently that research on translation policy has pricked the interest of researchers in the niche of translation policies - hence this study. Studying language and translation policies is important to understand their role in the creation and impact of democratic citizenship particularly in multilingual environments. Following the prescripts of the South African Constitution (Section 6, Act 108 of 1996), translation policy guidelines were developed by the National Language Service, a chief directorate under the Department of Arts and Culture. The purpose of this paper was to analyse these Policy Guidelines, to examine their chances of success in attaining what the Department of Arts and Culture as the custodian of diverse cultural, artistic, and linguistic heritage in South Africa, set out to achieve. From the analysis done and in the light of Sandrini's model (2016), it became evident that the translation policy guidelines understudy needed to be revised to meet the current developments and future technological advancement in the Republic of South Africa. It is therefore hoped that once the revision of the translation policy guidelines has been undertaken, a better product and a smooth working relationship amongst all the stakeholders involved in the translation services in South Africa would be enhanced.

Keywords: African languages; government; policy, translation, South Africa, translation policy

1. INTRODUCTION

The South African society expeditiously transitioned from racial segregation to a democratic dispensation in 1996. The South African Constitution, 1996 (Act 108 of 1996) proclaimed 11 languages as official, Sepedi, Sesotho, siSwati, Setswana, Tshivenda, Xitsonga, Afrikaans, English, isiNdebele, isiXhosa, and isiZulu - and now recently, South African Sign Language has joined to be the twelfth official language. Before 1994, only two languages, English and Afrikaans were regarded as official languages, while the other nine were restricted to the former homelands or national states, that were defined in terms of these languages, for example, the then Republic of Bophuthatswana for the Tswana people, KwaZulu for the Zulu people, KwaNdebele for the Ndebele people, Republic of Venda for the Venda people, and so forth. The new dispensation unleashed in 1996 necessitated that these nine previously marginalised languages had to share the same spotlight with English and Afrikaans, as official languages. This development created a sharp increase and the demand for translation, mostly in these historically disadvantaged languages. This

was accelerated by the government trying to comply with the Constitution, 1996 (Act 108 of 1996) which declared that the 11 (and now 12) official languages should be treated equally and equitably.

This state of things led to a hive of activities amongst language practitioners, both in the public as well as the private sector to fulfil this demand and need by the African masses who were having their first real taste of democracy in South Africa. Dlamini (2021: 13) argues that the number of language practitioners greatly escalated because of the increase in the required translations. There is no doubt then that the more government needed this kind of service in translation, a scramble for delivery was ignited. Some, who wanted to have a piece of the cake in this service were not well trained, companies that did not have the relevant background in language practice were haphazardly assembled, fly-by-night companies and individuals, and so forth, were rampant. There was therefore a need for the government to come up with a system of regulating and controlling this through some form of public policy or guidelines. Munday (2016: 19) argues that Holmes defines this field, 'translation policy' as advising on the place of translation in society. This is emphasised in the words of Molefe and Marais (2013: 75) where they argue that 'In the South African context, there is thus a need to draft and implement a translation policy.' On the other hand, Cloete and De Coning (2011: 60) define a public policy as a programme of action taken by the government to improve a current situation that is found unacceptable. Hence the need for government action to try and normalise what could lead to unsavoury outcomes as far as service delivery is concerned because of the lack of a translation policy.

1.1. Problem Statement

Fox and Bayat (2012: 13) argue that research problem involves limiting a general interest in a research topic and paying close attention to a specific problem that is small enough to be investigated. In this section, the problem statement from the South African linguistic context will be examined. The South African government declared 11 languages (now 12) as official in the country and by doing so, kickstarted a process that has seen translation gaining momentum. In the process, more people have taken a particular interest in translation. While South Africa did not or perhaps, currently does not have a system of regulating the work of language practitioners, it was necessary for the Department of Arts and Culture as the custodian of languages, through its chief directorate the National Language Service to come up with a policy or policy guidelines.

The policy guidelines were developed by the Department of Arts and Culture as a crucial document to ensure that service delivery is rendered at a consistently high quality - to satisfy the clients' expectations and to raise the professional image and status of all language practitioners in the Republic of South Africa. Von Doorslaer (2013: 62) contends that in situations where many languages exist and are being used, interests collide and power relationships develop, often on the bases of the struggles between the so-called, majority and minority languages. It is therefore important that a document that seeks to regulate the operations of language practitioners in the context of multilingualism be scrutinised to achieve equality and equity amongst official languages as espoused by the South African Constitution, 1996 (Act 108 of 1996).

If the policy guidelines fail in the task set, official languages in the Republic of South Africa would not be treated equally and equitably. This will also create confusion amongst the language practitioners, who will not find it necessary to produce quality work consistently, for the Department of Arts and Culture and other related departments or organisations. The Department could also find itself faced with litigations that could emanate from the many language practitioners or companies who are vying to render the language practice service to the government, and the government that seeks to be on the side of its citizens like South Africa, will face a serious level of embarrassment. Hence the importance of looking at these policy guidelines to point out and address inherent challenges.

1.2. Research Paradigm

The practices and theories followed in this study, viz. the research paradigm, is the transformative paradigm. The transformative paradigm is adopted in this study because it captures well the experiences of marginalised communities like the Africans in the Republic of South Africa. After 1994, the need for translation services was normally from English and/ or Afrikaans into either Sepedi, Sesotho, siSwati, Setswana, Tshivenda, Xitsonga, isiNdebele, isiXhosa, isiZulu, and recently South African Sign Language. The historically marginalized languages were in themselves not equal, for example, isiZulu is a real giant compared to the isiNdebele language. Therefore, the transformative paradigm takes into consideration that there are disparities in different community relationships that must be acknowledged and addressed. Social justice, which aims at treating these languages equally and equitably is therefore a solution in the Republic of South Africa. If these languages are treated equally and equitably as the Constitution, 1996 (Act 108 of 1996) stipulates, the transformation will be attained, hence the full support behind the transformative

paradigm, in this study.

1.3. Methodology

Babbie (2007: 319) identifies unobtrusive research which comprises content analysis, analysis of existing statistics, as well as comparative and historical research. Unobtrusive research methods can take a qualitative or a quantitative approach. For this study, content analysis was selected for its significance and relevance to achieve the intended purposes. Content analysis is defined by Babbie (2007: 320) as recorded human communications, such as books, magazines, poems, newspapers, and so forth. This article is, a review study, and an analysis was done on the policy guidelines. Content analysis on the policy guidelines was done on the policy guidelines per se, to summarise the current state of understanding regarding the translation policy guidelines in the Republic of South Africa. This nonreactive (unobtrusive) study is also qualitative as it looks at non-numerical data to gain an understanding of this social reality, in this case, the translation policy guidelines.

2. LITERATURE REVIEW

The literature review is seen by Fox and Bayat (2012: 14) as delimiting scientific boundaries and assisting in securing a space where research projects should be contextualised. In this section, the following relevant aspects will be discussed:

2.1. Translation policy

Van Doorslaer (2013: 60) makes an interesting comment that in most instances scholars rarely discuss about translation policy and prefer talking about language policy instead when the reality of every language policy finds expression in the translation policy. Therefore, in the case of South Africa, to have a translation policy or translation policy guidelines is a breakthrough of some sort, where many other countries fall short. Van Doorslaer (2013: 13) further contends that the reasons why translation policy seems to be overlooked in favour of language policy is that first, translation is seen erroneously as interlingual transfer only and therefore part of linguistics, when it is much more than that. To regard translation just as a tool to be used is misleading and incorrect. Translation can implement political or cultural values, for example. Second, translation is often restricted to a level where it is defined in terms of languages only, for example, in the Afrikaans language (translation is *vertaling*), where the 'carry over' function (translation) of the message is lost. Sandrini (2016) defines translation policy as the regulation of translation in official institutions, and it applies to linguistic minorities and their relation to majority languages.

When looking at the issue of the translation policy, even when some languages are identified for use, such languages may not be visible when looking at the actual translation practice. These languages that are at the receiving end, are usually the minority languages. In the case of the Republic of South Africa, the 'minority languages' could refer to the seven historically marginalised languages, which still lag when compared to languages such as English and to a lesser extent, Afrikaans. However, these languages are far from being 'minority languages' in terms of statistics (Figure 01). The issue of translation has no doubt - power relations undertones because in the case of South Africa for example, most translations are from English and Afrikaans, into the other official languages. This in essence means that the other official languages are still grappling with their identity and status as official languages. This fact (power undertone) may certainly be a mere pretext that could be used by those in power when they want to undermine, the so-called minority languages: for example, financial reasons, not enough employees who are well trained in that specific language, and no resources, etc. as explained by those in power when they cook up reasons to overlook transforming the *status quo*.
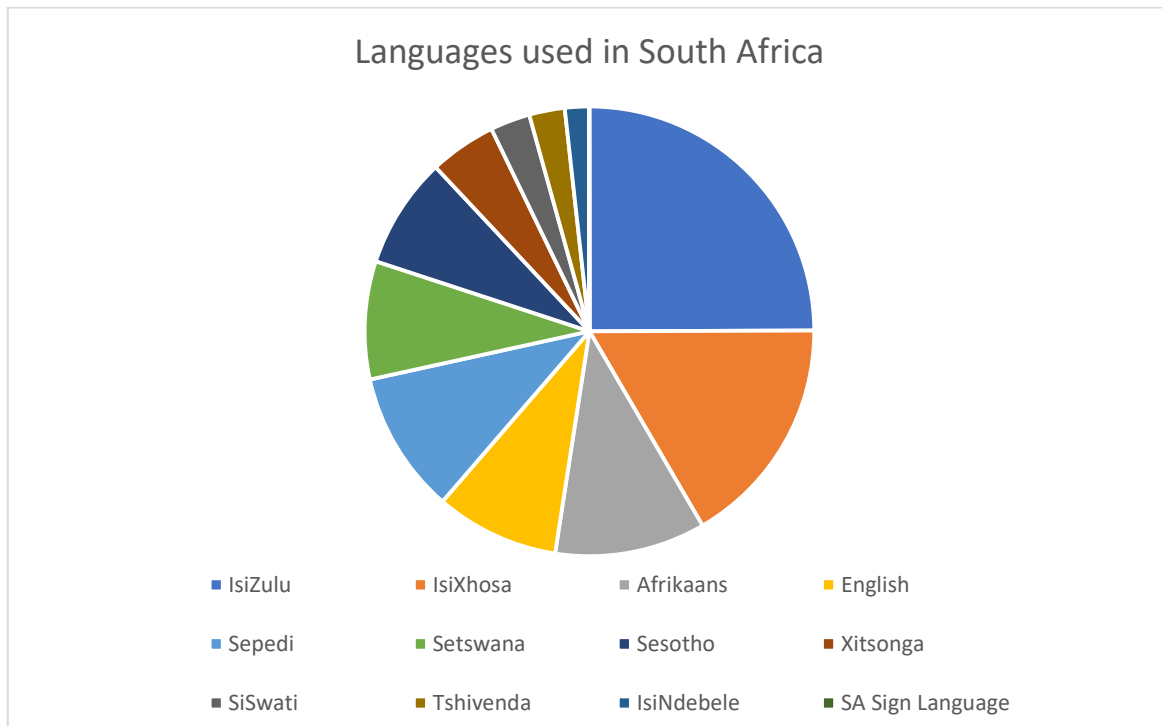
Figure 01: 2022 Census statistics

Furthermore, Van Doorslaer (2013: 68) argues that three reasons are normally cited for not producing translations in minority languages. They are financial reasons; not having enough adequately trained staff in some languages as well as sheer unwillingness by those in power to assist. These reasons may be genuine and at times mere excuses for not complying and doing what is supposed to happen. In the case of the South Africa speakers of the African languages that were marginalised in the past, they are usually not well-to-do, and this denies them opportunities of having their languages used at times because of a lack of financial muscles. Also, there are fewer people employed by the government partly because of competing financial needs such as housing, education, and welfare of those historically marginalised. Finally, staff members sometimes are arrogant and biased in certain instances, to have translation services in certain languages.

2.2. Public Policy

According to Aguinis, et al. (2023: 1), public policies come in a variety of forms, such as plans, strategies, blueprints, guidelines, programs, regulations, and reforms. The Policy Guidelines developed by the Department of Arts and Culture in South Africa, are therefore part of what could be defined as policies. These authors (Aguinis, et. al., 2023: 1) further agree that policies aim to constrain stakeholders' behaviour in specific settings. To add to this, Yalmanov (2020: 558) contends that policies are government administrative actions, including laws, regulations decisions, or orders that follow a particular purpose. The policy is meant to guide the actions of stakeholders such as employers, employees, members with vested interests, service receivers, service providers, etc. about all aspects under the jurisdiction of a specific organisation.

There are several advantages to having policies in an organisation such as assisting in how certain tasks need to be done, for example, how must the translation work be distributed amongst the freelancers. This creates a system of fairness that eliminates biases for both the commissioners and service providers involved. The employer in this case being government is also protected from litigations as well as being regarded as behaving unfairly. Staff members can make decisions efficiently and promptly, guided by the policy, and can give appropriate guidance to the contractors. Policies are therefore useful and necessary in making sure that things are done accordingly, provided that the policies are recorded fairly and are updated when and if necessary.

Yalmonov (2020: 559) argues that several approaches could be used to view policy-making efforts such as behavioural model, policy cycle model, rational approach, incremental model, pluralist model as well as the political system model. For this study, a policy cycle model appears relevant. This is because this model

separates the policy process into several units to show how policies are formulated, and how one view from these many choices, will ultimately be adopted. According to the South African National Policy Development Framework 2020 (2020), a policy comprises four stages (policy cycle model), viz. policy formulation, policy adoption, policy implementation as well as policy evaluation. Out of these stages, the policy evaluation is crucial for the current policy guidelines as this evaluation exercise could lead to an efficient and effective policy.

This policy evaluation or policy assessment is defined by Rabie and Cloete as involving judgments on the merits of the policy given the results of decisions on public welfare and growth (Rabie & Cloete: 2019). The two authors argue that policy evaluation has moved from being a mere sterile exercise to problem and solution-oriented, and these augers well particularly for South Africa which developed from the past authoritarian state of 'Apartheid' to a democratic one. It is also crucial to realise that policy development is political. Hence the importance of the development of an appropriate translation policy in a country like South Africa, which is respected among the leading countries that respect multiculturalism as well as multilingualism.

3. ANALYSIS OF THE POLICY GUIDELINES: TRANSLATION AND EDITING

The Chief Directorate named National Language Service (NLS) under the Department of Arts and Culture in the Republic of South Africa, produced these Policy Guidelines: Translation and Editing. These Policy Guidelines are divided into 16 sections, and several salient features from the Policy Guidelines are discussed below:

3.1. Introduction

The introduction addresses the provision for the systematic handling of documents submitted to the NLS and Language Units (LUs) for translation, editing, and checking in the 11 official languages and foreign languages requested by clients. NLS/LUs will assist in compliance with the National Language Policy Framework (NLPF). Unfortunately, the National Language Policy Framework (NLPF) does not exist, as it was rejected by the majority of the speakers of the indigenous African languages, particularly of the Nguni and Sotho languages, and was then replaced by another legislation, *Use of Official Languages Act, 2012.*

3.2. Purpose

The purpose of the Guidelines is to ensure service delivery of a high quality to satisfy clients' expectations. Also, the purpose of the Guidelines is to raise the professional image and status of all language practitioners. The Guidelines do not indicate how this will be done, particularly the crucial issue of power dynamics for the previously marginalised languages who must translate almost all their texts using English and at times Afrikaans, as source languages.

3.3. Rationale

The Guidelines acknowledge that language work is done both in the public and private space in an unregulated manner as there is no system in place to evaluate and monitor the standards and competencies of language practitioners. Regarding minimum norms and standards relating to training, accreditation, and registrations of language practitioners the document purports to deal with, it is dead silent. Also, the issue of LUs is challenging now as it seems that the LUs have a choice whether to use the Policy or not, while in the introduction, it appears mandatory to use this policy.

3.4. Guiding Principles

Guiding principles are mentioned, such as expectations from the translators, for example, competence. There is however no clear indication as to what is meant by competence in the translation context, for example.

3.5. Legal context

The legal context for the Guidelines is indicated, for example, the Constitution of the Republic of South Africa, 1996 (Act 108 of 1996, section 217). However, there is no mention of the *Use of Official Languages Act, 2012,* which (the Act) is important in the implementation of the multilingual policy in government.

3.6. Scope of Application

The Guidelines apply to all language practitioners employed by the government, all freelancers contracted by the government as well as clients who request services from the government. However, it is not clear if it applies to provincial as well as municipal employees who work as language practitioners. Also, there is no

mention of the LUs or its employees in this section.

3.7. Clients, Documents, and Costs

The clients are mentioned in this section. The provincial government are indicated particularly for foreign languages. One wonders if the Department dealing with Foreign Affairs does not have a language component to assist in this.

Documents for translation, editing, and checking that are mentioned here, are for official purposes only, such as Bills, Acts, notices, etc.

Documents other than the one mentioned in this section could be facilitated by NLS/LUs but in such cases, the costs will be borne by the clients. It is not clear which are those documents.

3.8. Service Delivery

Delivery is in line with *Batho Pele* (People First) principles. The government according to this, will hold consultations with all partners and clients. It is not clear when or if any such meeting has ever been.

The Guidelines also talk about the Language Practitioners' Council, which would be responsible for regulating the training of language practitioners and controlling the accreditation and registration of such practitioners. The Council has not yet been established as of now.

The Guidelines also talk about production norms, for example, 1 500 to 1 750 words per day for translation, 2 000 to 2 500 words for checking per day, and 3 000 to 3 300 words for editing per day. How reliable are these, it is not so clear. How does one deal with the Nguni and Sotho challenge regarding word count, where Sesotho is written disjunctively while Nguni languages are written conjunctively, it is not clear.

3.9. Conditions of Acceptance

Conditions for accepting the work are detailed, for example, only documents for official purposes will be accepted. But why due dates are included in this section - to be written, is not clear. Are they perhaps a condition?

3.10. Procedure for Receiving Documents

The procedure for receiving the documents is explained, starting from the Head of the Auxiliary Services (H/Aux) or Head of the Language Unit (H/LU), who will receive the incoming work. Are the NLS Guidelines prescribing how the LUs will operate? The role of the head of translation is also minimal in this particular task.

3.11. Record Keeping

Records are done and kept by H/Aux and H/NLUs.

3.12. Outsourcing of Documents

If documents are to be outsourced because of a lack of capacity in-house, there is an appropriate procedure to be followed. In-house translators are not allowed to receive such work for translation as freelancers.

Figures as payment for freelancers are unrealistic, considering that the Guidelines aim to raise the status of the language practice. For example, not less than R40 per 100 words for translation, not less than R20 per 100 words for editing, and not less than R30 per 100 words for checking.

Also, the letter of instruction is mentioned, and eight important points are mentioned for the NLS/LUs.

3.13. Requirements for Freelancers

This section deals with expectations from freelancers, such as how they need to tackle work given to them.

3.14. Quality Control

This section explains what will be done to ensure that work done by freelancers is of good quality. A feedback form is received from the clients regarding the work done, whether in-house or outsourced. This is reported to the Programme Manager every three months.

3.15. Processing Payments

This section deals with how payments for freelancers are handled, for example, submitting work with the invoice, and so forth.

3.16. Amendments

The Policy Guidelines will be amended by the NLS if required, and according to the text, stakeholders will be informed of such an amendment. This aspect indicates that stakeholders are not going to be part and parcel of the discussions leading to whatever amendments may be required.

4. DISCUSSIONS

When looking at the above analysis, there are gaps between the policy guidelines made by the South African government as opposed to the proposal made by Sandrini (2016), for example, item (g) in 3.8. below, is almost not discussed in the policy guidelines. While the National Language Service of the South African Department of Arts and Culture did a remarkable task by producing these Policy Guidelines: Translation and Editing, a few issues emanating from the discussion under (2} above, could be identified and discussed as a way forward:

4.1. National Language Policy Framework (NLPF)

Dang & Bao (2014) argue that communication within one community is at times not enough and the language outside the community may become a barrier. The Department of Arts and Culture produced the National Language Policy Framework (NLPF) in 2003, as a way of addressing the challenges of linguistic and cultural diversity in the Republic of South Africa. While the NLPF addressed some challenges, the Nguni and the Sotho language groups were not happy with the fact that there would be language alternations in each of the two groups. In instances where government documents could not be made available in all the 11 or 12 official languages, for example, the documents would be made available in at least six languages simultaneously. The selection would be as follows: one Nguni language (choice interchangeably from isiNdebele, Siswati, isiXhosa, and isiZulu), one Sotho language (choice interchangeably from Sepedi, Sesotho, and Setswana), Tshivenda, Xitsonga, English and Afrikaans.

However, instead of going with the NLPF, the government enacted the *Use of Official Language Act, 2012* (Act no. 12 of 2012) instead. This Act regulates and monitors the use of official languages in the Republic of South Africa. It is this Act that should have been used as the basis of the Policy Guidelines: Translation and Editing, and not the NLPF. From the paragraph above, it is clear that the Nguni and Sotho language groups would be at a disadvantage in that not all these language groupings would be used at the same time, hence it would appear as if they were treated as one language for Nguni, and one for Sotho languages. Hence the *Use of Official Languages Act, 2012* addresses this challenge, and that is why this Act must be used, and not the NLPF.

4.2. Commission

The commission is a translation brief or the commissioner's instructions to the translator (Nord, 2007, 21). According to Munday (2016, 129) Vermeer, describes commission as comprising a goal as well as conditions under which that goal should be attained (including deadline and fee). In terms of the of the compelling need to ensure that the translatorial action is appropriate in a particular situation and context, the purpose of the translation must be spelled out directly or indirectly in the commission or brief as this is crucial for the translation exercise. In terms of the Policy Guidelines: Translation and Editing, this is covered lightly under what is called a 'letter of instruction and request for authorisation content.' While the Policy Guidelines talk about eight points (Department of Arts and Culture, n.d., 16), in contrast, Dlamini (2021, 48) names 19 points. The fact that in the Policy Guidelines: Translation and Editing, so few are mentioned in this aspect creates more controversies and misunderstandings amongst the stakeholders. For example, it is left to the translator to decide who is the targeted translator. When it comes to isiZulu, there are those who live in the KwaZulu Natal, and those in the Gauteng, and the language that they use should not be the same even though it is the same isiZulu language. I am reminded of a case when I worked for one of the leading banks in South Africa, where a client residing in the USA demanded that the bank communicate to him in his mother tongue, isiZulu on a particular matter. I had a dilemma of, for example, writing January as *uJanuwari* or *uMasingana,* for the month. I settled for the former, and needless to say the client was impressed with the communication. For a client in the KwaZulu Natal area, I would have probably opted for *uMasingana* instead of u*Januwari,* for the translation of January into the isiZulu language. It is the knowledge of who exactly the target text reader is and their expectation, that guides the translator optimally, and where this is not clear in the brief, the translator is likely to be found wanting, and this could create misunderstanding and unnecessary conflicts.

4.3. Rates

The Policy Guidelines: Translation and Editing indicates the following rates for remunerating the freelancers

using the English text irrespective if it is a source or target language, at a preference rate of not less than R40/ 100 words. This implies that the Translation Unit does not see itself translating, for example, a text from Sesotho into the isiZulu language. This is a question of power dynamics implying that English is forever a language of dominance. This is unfortunate, especially coming from a Unit that seeks to put all official languages on the same level.

Second, the issue of the payment rate is also challenging, to say the least. Although this is not stated exactly how much the rate is, the 'not less than R40/100 words' is reducing translation to a low rate indeed irrespective of when this policy was drawn. It is important to remember that the purpose of this policy is to lift the status of the translation professions, amongst other things. Payment rate can be associated with the status of the profession. The same argument (low remuneration rate) could be said of the translation as well as the checking rates. It is also important for such a policy to state exactly how much the freelancers would be renumerated, to avoid exploitation and corruption of these often, vulnerable freelancers. Of course, such a rate would change from time to time, but if the exact rate is fixed, and is known by all involved, so much the better.

Another important challenge is what could be the difference between checking and editing in terms of the work involved. Which one of the two is more elaborate? Is it a fair exercise to have a rate of checking more than that of editing? Also, in the case of checking, the policy document talks about using both texts' word counts (source and target), while in the editing, only the source text word count is used. This needs a clear definition of each of the two exercises, i.e., editing and checking, and the attachment of the correct rate for each.

4.4. Production Norms

The policy document mentions production norms related to translation, checking, and editing work. According to the document, 1 500 to 1 750 words per day for translation, 2 000 to 2 500 words per day for checking, and 3 000 to 3 500 words per day for editing. The policy document goes on to identify aspects that will make the production norms untenable, for example, lack of relevant dictionaries and terminology lists, degree of standardisation of terminology lists, and so forth. These are crucial challenges because they affect African languages directly. The production norms are also used when it comes to employee assessments for promotions and salary increments. Since this is affecting the previously marginalised languages more, that would mean that African language practitioners are still disadvantaged, when compared to the official languages before 1994.

4.5. Sphere of Application of the Policy

These Policy Guidelines have been developed by the NLS, and here and there, there is mention of Language Units. Are the Language Units expected to use the Policy Guidelines: Translation and Editing? It should be clear in the text itself, and not as it is where in some cases Language Units are mentioned, and in some cases, they are not, or is written that they may use the Policy Guidelines. Under 6, there is mention that the 'policy applies to all language practitioners employed by the government, including the Department of Arts and Culture.' What is the position of Language Units here? What about language practitioners employed at the provincial and local levels of the public service in South Africa? There should be clarity on where the policy applies, or enough discussion needs to take place regarding the sphere of application of the policy.

4.6. Technology

Currently, in the global age, Sandrini (2016) argues correctly that there is no translation policy without a digital translation policy. The translation technology is not used maximally in the operations of the NLS. There is no mention for example, of translation memory regarding the translated texts. There is no use of translation software that would assist in managing term banks, for consistency's sake in the translated documents, the reuse of translations, and so forth. Related to the translation policy according to Sandrini (2016), is Computer Aided Translation (CAT) policy, machine translation policy, and translation data policy.

4.7. Meaning of Official Documents

According to the Policy Guidelines: Translation and Editing, official documents will be prioritised, and other documents that need translation could be facilitated by NLS with the understanding that those Departments will pay for the costs of such a service. Meylaerts (2011: 165) contends that there needs to be a discussion regarding what works, for example, needs to be translated. The issue of what is official, needs to be unpacked, as various texts could assist in the development of the languages as well as the communities. Meylaerts (2011), for example, brings in the systems theory of Even-Zohar, where he proposes a translation

policy based on the primary and secondary position of the translated literature, in terms of the receiving culture. In other words, the translated text could take a primary position, as a result of a young literature, weak literature or a vacuum in the literature. Most of the African languages in the Republic will naturally accept most translated literature in the primary position because of the historical disadvantages these languages experienced during the apartheid period. The question of official as well as the primary position of translated texts therefore needs to be discussed so that in the end, an agreement is reached regarding which texts need to be translated over above what the government may regard as its priority.

4.8. Amendments

Amendments of the Policy Guidelines: Translation and Editing need to be prioritised as it is crucial. A bottom-up rather than a top-down approach needs to be adopted. Stakeholders such as translators from the government, freelancers, language units, senior managers in government, provincial language units as well as municipal language units, etc. need to be involved in the policy amendment to avoid many inconsistencies and uncertainties in this important document. Inconsistencies such as differences between checking and editing should be thoroughly dissected, a proper payment rate be arrived at, and so forth.

In complementing the above analysis (2.3.1. to 2.3.16), Sandrini (2016: 23) argues that to clarify the concept of translation policy, a set of standard W-questions could be applied. These questions are: who, what, when, why, in what way, by what means. In other words, a complete translation policy should be able to answer these seven questions, and if any question is not answered, the translation policy will not be efficient.

The questions could be seen in the following light:

a. Who?: Who is going to translate? Freelancer or in-house staff?

b. What?: What will be translated? What kind of texts? What is excluded in translation and why?

c. When?: Is text translation required urgently or later?

d. Where?: Where is the translation coordinated, are there in-house translators or freelancers involved? Common guidelines and regulations for translation tenders?

e. Why?: The reason for the translation. Could be political, minority rights, accessibility of official documents, etc.

f. In what way?: Talks about translation strategies and methodologies, translation management, quality assurance, etc.

g. By what means?: Translation is produced by what technology, automatic machine translation systems, translation memory systems, terminology support systems, etc.

5. RECOMMENDATIONS AND CONCLUSION

The Policy Guidelines: Translations and Editing are a crucial document that handles an important function in the productive interaction between government and citizens in the Republic of South Africa. Service delivery is seriously hampered unless all the 12 official languages are optimally used, as Thiong'o (2018) argues that the struggles amongst languages reflect essentially the underlying struggles amongst communities for economic and political power and dominance. Also, interaction with the global community could be negatively affected if the policy is not revisited and challenges thoroughly addressed. Meylaerts and D'hulst (2016) contend with many other authors as indicated in the abstract above, that the historical study of translation policy is still in its infancy. It is in this light that it is highly recommended that the Policy Guidelines: Translations and Editing is evaluated and accordingly amended or revised as a way forward, not only for South Africa but as an eye-opener for a greater part of the world.

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