

POLICY FRAGMENTATION IN AI-BASED ENGLISH ADMISSIONS TESTING

A Welsh Policy Analysis of the Duolingo English Test

AKRAM BARATI

AIM & CONTEXT

Aim
To analyse a policy coordination problem in UK higher education admissions.

Context

- Increasing use of AI-based English tests (e.g. DET)
- Institutional autonomy in admissions
- Centralised visa regulation (UKVI)

Tension between innovation and regulation

POLICY PROBLEM

Universities may accept AI-based tests such as the Duolingo English Test (DET), but these are not recognised by UK Visas and Immigration (UKVI) as Secure English Language Tests (SELTs).

This creates a misalignment between:

- Institutional admissions decisions
- Visa eligibility requirements

Impact:

- Student confusion
- Inefficiency
- Potential unfairness

EVIDENCE BASE

- 1.University policy documents (Wales)
- 2.UKVI regulatory framework
- 3.Academic literature on language testing
- 4.Emerging research on DET

Key Insight:
Validity of DET is supported in some studies
But regulatory recognition is absent

CONCEPTUAL FRAMEWORK

- alidity → Does the test measure language ability?
- Fairness → Equal treatment of applicants
- Policy Interpretation → Institutional decision-making (Lipsky)

Focus: how policy is enacted in practice

INSTITUTIONAL MAPPING

Findings show variation across Welsh universities:

- 1.Some accept DET
- 2.Some do not mention it
- 3.Some apply programme-specific rules

No consistent sector-wide policy

KEY POLICY GAP

The issue is not absence of policy, but lack of coordination.

Missing:

- Clear guidance
- Shared framework
- Consistent communication

Responsibility shifts to applicants

POLICY OPTIONS

- Option 1: Full acceptance
- Option 2: Conditional acceptance
- Option 3: Full rejection

Evaluation Criteria:

- Fairness
- Feasibility
- Regulatory compliance



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RECOMMENDATIO

- Conditional acceptance (preferred)
- Align with UKVI requirements
 - Maintain flexibility for institutions
 - Improve transparency for students

IMPLEMENTATION

- Clear institutional guidance
 - Alignment with visa regulations
 - Improved applicant communication
- Focus on coordination, not structural change

CONCLUSION

AI-based assessment is advancing faster than policy coordination.

Without alignment between institutions and regulators:

Innovation may create inequality
Effective governance is essential

REFERENCES

Bardach & Patashnik (2020)
Lipsky (1980)
Bachman & Palmer (2010)
Isaacs et al. (2023)
UKVI (2024)
Cardiff University (2024)

