



Policy Fragmentation in AI-Based English Admissions Testing

A Welsh-Focused UK Policy Analysis of the Duolingo English Test (DET)

Policy Context

DET is a fully online, adaptive English proficiency test increasingly used by universities to support international recruitment. While some Welsh universities accept DET for academic admission, UK Visas and Immigration (UKVI) does not recognise DET as a Secure English Language Test (SELT) for Student Route visas. This creates a policy tension between:

- institutional admissions autonomy
- Nnational immigration regulation

Policy Issue

The rapid uptake of AI-mediated English language assessments, such as the Duolingo English Test (DET), has introduced new governance challenges in UK higher education. In Wales, the absence of unified guidance on how DET should be accepted and communicated in admissions has resulted in:

- inconsistent decision-making
- unclear expectations for applicants
- and potential inequities in access to higher education.



Analytical Framework

Aim
To examine how Welsh universities publicly position the Duolingo English Test within admissions policies and how clearly they communicate UKVI-related limitations.

Policy question
How should Welsh universities balance widening access through AI-based tests with their responsibility to provide transparent, UKVI-compliant admissions information?

Method
Desk-based policy analysis (no empirical research).

- Sources analysed**
- English language entry requirement webpages of Welsh universities
 - Admissions and international student guidance documents
 - UKVI SELT policy and visa guidance
 - UCAS principles on fairness and transparency

Analytical Framework
The analysis applies Bardach's Eightfold Path to structure policy evaluation and decision-making.
Evaluation criteria:
1. Regulatory compliance (alignment with UKVI/SELT rules)
2. Transparency (clarity and accessibility of admissions information)
3. Feasibility (operational practicality for admissions teams)
4. Equity and student protection (avoidance of unintended disadvantage)
This framework supports systematic comparison of policy options and consideration of trade-offs.

Evidence from Wales (Public Policy Documents)

University	DET Policy Status	Notes
Bangor	Accepted with score equivalencies	Clear IELTS comparison published
Wrexham	Accepted for online/selected programmes	Transparent thresholds
Cardiff	Conditional (mainly pre-sessional)	SELT priority for visa students
Swansea	Unspecified/Programme-dependent	No central statement
Aberystwyth	Unclear/Not specified	No explicit DET reference
University of South Wales (USW)	Not clearly specified	Indirect or fragmented references
University of Wales Trinity Saint David (UWTSD)	UKVI-SELT focused; no DET statement	Reliance on UKVI framework

Policy Options

1. Full Acceptance	DET allowed across all programmes	Enhances equity and widens access	Conflicts with UKVI visa rules (non-SELT)
2. Conditional Use (Recommended)	DET accepted only for online, foundation	Transparent and fully compliant with visa regulations	Limited reach (not applicable to visa-requiring programmes)
3. Non-Acceptance	DET not accepted by the institution	Clear regulatory compliance and minimal risk	Restricts access and reduces international competitiveness

Recommendations

- Adopt a conditional DET policy as a Wales-wide minimum standard, whereby:
- DET is accepted for online, distance-learning and non-visa routes;
- SELT-approved tests are clearly required for Student Route visas;
- a single central admissions webpage explains DET acceptance and UKVI limitations in plain language.
- This approach balances access, compliance and institutional risk management.

Policy Takeaway

DET adoption in Wales is not merely a technical testing issue. It represents a policy governance challenge at the intersection of digital innovation, admissions autonomy and immigration regulation. Clear, coordinated and transparent policy communication is essential to ensure fairness and protect international applicants.

References

- Bardach, E. and Patashnik, E.M. (2020) A Practical Guide for Policy Analysis. 6th edn. CQ Press.
- Isaacs, T., Hu, R., Trenkic, D. and Varga, J. (2023) 'Examining the predictive validity of the Duolingo English Test', Language Testing.
- Knoch, U. and McNamara, T. (2019) 'Language testing and social justice', Language Testing, 36(4), pp. 449–469.
- UK Visas and Immigration (2024) Secure English Language Tests (SELT): approved tests and providers.
- UCAS (2023) Fair admissions principles.