Managing Language Policy Formulation
at a German University of Applied Sciences

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Abstract

Existing literature (Erling & Hingeldorf, 2006; Earls, 2014) indicates that there is a lack of formal policies at the macro- or meso-level governing the use of English in German higher education. This has led to a situation in which higher education institutions (HEIs) are required to formulate and implement their own policies and guidelines regarding English-medium instruction (EMI). As a growing number of HEIs adopt EMI (Wächter & Maiworm, 2014; Macaro et al., 2018) without access to policy guidelines, there is an urgent need to scrutinize the policy formulation and implementation processes at the institutional level. Such investigation is crucial to understand the complexities that come with tailoring EMI to unique institutional contexts, objectives, and stakeholder needs. We believe that this will enable more effective and equitable implementations, while also providing insights that could inform future policy recommendations. In this article, we analyze the motivations for drafting a language policy at a medium-sized German university of applied sciences[1] (UAS) and investigate the attitudes and opinions towards EMI of three stakeholder groups: faculty members, administrative staff, and the student body. We were especially interested in exploring the rationales for implementing Bilingual Degree Programs (BDPs), as a variant of EMI, and how each stakeholder group influenced the formulation and implementation of the policy. To get an initial overview, we read institutional policy documents outlining the proposed language policy. We then complemented the documentary analysis by conducting a survey investigating the attitudes and opinions of the stakeholder groups using a questionnaire format (n=207). Finally, to gain deeper insights and triangulate data from the questionnaire, we conducted semi-structured interviews (n=18). Analysis of the data indicates that the primary motivation for implementing BDPs is to attract greater numbers of international as well as domestic applicants to make up for an ongoing decline in student numbers. We also discovered that stakeholder groups hold different beliefs about BDPs, impacting their level of support for their implementation. We argue this is due to some groups within the institution being more influential in policy formulation, leading to feelings of disempowerment in individuals tasked with implementing BDPs, but not being consulted in the policy formulation process. Finally, it also seems that the institutional policy is driven by experience in implementation, resulting in policy enhancement over time. We assume this approach is a direct outcome of the lack of policy guidelines and consider the issues that arise from such an approach and share implications of the current practice.

Key terms: English-Medium Instruction (EMI); language policy formulation; internationalization in Higher Education

Abstract

Die vorhandene Literatur (Erling & Hingeldorf, 2006; Earls, 2014) zeigt, dass es weder auf der Makro- noch auf der Mesoebene formale Richtlinien gibt, die den Gebrauch des Englischen in der deutschen Hochschullandschaft regeln. Dies hat dazu geführt, dass Hochschulen eigene Richtlinien und Leitlinien für die Verwendung des Englischen an Hochschulen formulieren und umsetzen müssen. Da eine wachsende Zahl von Hochschulen English-Medium Instruction (EMI) ohne Zugang zu Richtlinien

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[1]   *Hochschule für Angewandte Wissenschaften (HAW)*

implementiert (Wächter & Maiworm, 2014; Macaro et al., 2018), besteht ein dringender Bedarf, die Prozesse der Richtlinienbildung und -implementierung auf institutioneller Ebene genauer zu untersuchen. Eine solche Untersuchung ist entscheidend, um die Komplexität zu verstehen, die mit der Anpassung von EMIs an einzigartige institutionelle Kontexte, Ziele und Stakeholderbedürfnisse verbunden ist. Wir glauben, dass dies zu effektiveren und gerechteren Implementierungen führen wird und gleichzeitig Erkenntnisse liefern kann, die zukünftige politische Entscheidungen beeinflussen können. In diesem Artikel analysieren wir die Beweggründe für die Entwicklung einer Sprachenpolitik an einer deutschen Hochschule für angewandte Wissenschaften (HAW) und untersuchen die Einstellungen und Meinungen von drei Stakeholdergruppen zu EMI: Lehrende, Verwaltungspersonal und Studierende. Wir waren besonders daran interessiert, die Gründe für die Einführung *Bilingual Degree Programs* (BDP) als eine Variante von EMI zu erforschen und herauszufinden, wie jede Stakeholder-Gruppe die Formulierung und Umsetzung der Strategie beeinflusst hat. Um uns einen ersten Überblick zu verschaffen, haben wir die institutionellen Strategiepapiere gelesen, in denen die vorgeschlagene Sprachenpolitik umrissen wird. Diese Dokumentenanalyse haben wir durch eine Umfrage ergänzt, die die Einstellungen und Meinungen der Stakeholder-Gruppen in Form eines Fragebogens (n=207) untersucht hat. Schließlich wurden Interviews durchgeführt (n=18), um die Erkenntnisse zu vertiefen und die Daten aus der Umfrage zu triangulieren. Die Analyse der Daten zeigt, dass die Hauptmotivation für die Einführung von BDPs darin besteht, mehr internationale und nationale Bewerber anzuziehen, um den anhaltenden Rückgang der Studentenzahlen auszugleichen. Wir haben auch festgestellt, dass die Stakeholdergruppen unterschiedliche Überzeugungen bezüglich der BDPs haben, was sich auf ihre Unterstützung für deren Umsetzung auswirkt. Wir argumentieren, dass dies darauf zurückzuführen ist, dass einige Gruppen innerhalb der Institution einen größeren Einfluss auf die Politikformulierung haben, was zu einem Gefühl der Machtlosigkeit bei denjenigen führt, die für die Umsetzung der BDPs verantwortlich sind, aber nicht in den Prozess der Formulierung der Strategie eingebunden waren. Schließlich scheint die institutionelle Strategie auch von den Erfahrungen bei der Umsetzung vorangetrieben zu werden. Dies führt zu einer kontinuierlichen Verbesserung der Strategie im Laufe der Zeit. Wir gehen davon aus, dass dieser Ansatz ein direktes Ergebnis des Mangels an Richtlinien ist, und untersuchen die Probleme, die sich aus einem solchen Ansatz ergeben, sowie die Implikationen der aktuellen Praxis.

Schlüsselbegriffe: English-Medium Instruction (EMI); Formulierung einer Sprachpolitik; Internationalisierung im Hochschulwesen

1. Introduction

As the internationalization of higher education continues, English-medium instruction (EMI) – defined by Dearden (2015, p. 2) as "The use of the English language to teach academic subjects in countries or jurisdictions where the first language (L1) of the majority of the population is not English" – has become a crucial element within higher education institutions (HEIs) worldwide (Dearden, 2015; Macaro et al., 2018). This trend is particularly significant in Europe, where HEIs have experienced a rapid expansion of EMI, as evidenced by a staggering 239 % increase in English-taught programs from 2,389 to 8,089 between 2007 and 2014 (Wächter & Maiworm, 2014). This surge in EMI can be attributed to a number of factors: programs taught partially or completely in English meet the educational aspirations of international students seeking high-quality education in non-English-speaking countries; they equip domestic students with essential skills to succeed in a globalized workforce; and they enable institutions to raise their international profile, thereby strengthening their competitive edge in the global higher education arena.

German higher education mirrors this international trend. Recent numbers on English-taught programs indicate a rise from 2,115 in 2021 (MyGermanUniversity, 2021; as cited in Hunter & Lanvers, 2021) to 2,599 in 2023 (MyGermanUniversity, 2023), demonstrating continued growth in EMI. However, while absolute numbers seem significant, the proportion of these programs presents a more balanced view. Data from the German Rectors' Conference[2] in 2021 indicates that merely 14 % of Master's and 2.7 % of Bachelor's programs are conducted exclusively in English (DAAD, 2021; as cited in Hunter & Lanvers, 2021). This highlights the considerable potential for broadening the scope of EMI in the German higher education landscape. Faced with a demographic shift towards an ageing population, German HEIs are focusing on attracting international students and researchers to make up for the shortfall in domestic students, while, at the same time, government authorities are beginning to view international students as potential contributors to the national labor force (Earls, 2014). This convergence of institutional and governmental interests could catalyze the expansion of EMI, making programs taught partially or wholly in English a key component of Germany's strategy for maintaining and expanding its academic and workforce capacity.

Much of the research on EMI to date has focused on its impact on teaching and learning, though recent studies have started to explore policy-related aspects, placing EMI in a broader socio-political context. This new line of research is crucial, as it can uncover underlying ideologies and potential disadvantages resulting from the implementation of EMI programs (Dimova et al., 2015). As German HEIs will undoubtedly continue to expand their EMI offerings, it is therefore increasingly important to examine how institutional policies on EMI are articulated, who contributes to their formulation, and ultimately who is responsible for their implementation at the institutional level. Such research can shed light on potential inequalities, examine their impact on the implementation of EMI policies, and suggest ways to anticipate and address these issues.

This paper explores the formulation and implementation of a language policy at a German university of applied sciences, shedding light on the key actors involved in policy formulation and implementation. The investigation proceeds on two levels: the institutional level and the individual level, embodied by different stakeholder groups at the institution and focuses on a medium-sized university of applied sciences (UAS) in south-west Germany. We examine the institution's decision to introduce Bilingual Degree Programs (BDPs), taught in English and German, aimed at fostering fluency in both and explore the dynamics of institutional policy making and implementation.

The data indicates that within the three stakeholder groups examined at this UAS – faculty, administrative staff, and students – faculty members, having contributed to policy formation within their faculties, are the most informed about the language policy. Conversely, administrative staff, particularly those in central services, are less informed about the implementation of BDPs, and consequently, express less support for the initiative. We discuss the implications of these disparities for the implementation of BDPs and language policies more broadly, and propose strategies to foster inclusivity in policy formation, thereby enhancing stakeholder acceptance and support and ensuring the efficient implementation of institutional policies.

This article presents and discusses findings related to the implementation of Bilingual Degree Programs at a German university of applied sciences, which have emerged from the corresponding author's (McDouall, in progress) broader doctoral research which investigates the rationales behind implementing a policy of partial EMI, stakeholder attitudes towards EMI, as well as administrative issues arising from the implementation of partial EMI in the context of a university of applied sciences.

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[2] *Hochschulrektorenkonferenz*

2. Background

In his article on the role of English and German in a multilingual English-medium degree program, Earls (2014) points out that language policies at German higher education institutions (HEIs) emerge without clearly defined, written planning activities. Instead, these policies are characteristically developed through an examination of the prevailing language practices and beliefs within their academic communities. This phenomenon is exemplified by the introduction of English-taught programs in Germany, which Earls (2014) refers to as English-Medium Degree Programs (EMDP). The lack of an explicit language education policy at the national level has led to a wide range of interpretations and implementations of these programs, with institutions shaping these policies according to their individual contexts and needs.

The HEI where this study took place exemplifies the aforementioned issue identified by Earls (2014). Starting in 2018, discussions about the implementation of bilingual degree programs emerged without a policy framework to guide this transformative process. Once the desire to internationalize the university was expressed by the university's leadership, and Bilingual Degree Programs (BDPs) were seen as the way to achieve this, the architecture of these programs was discussed, defined, and iteratively refined. The task was assigned by the Vice President for Internationalization to their staff, who liaised with upper administration and faculty members, to outline and define what BDPs look like. This approach considered not only the requirements of the institution, but also the needs of individual faculties. This case study therefore offers a vantage point from which to analyze the concrete dynamics of language policy formation and its ramifications within a single institution, and, in doing so, provides insights into the broader discussion of English-medium instruction (EMI) in higher education contexts.

3. Methods

Data collection for this exploratory study was conducted via an online questionnaire distributed to all members of the university community through the institution's learning management system. The questionnaire, which was completed by 207 participants, consisted of both Likert scale questions and open-ended items, and was followed by 17 semi-structured interviews with selected members of the university community.

The one-to-one interviews were conducted with members of the university rectorate, faculty members, administrative staff and students and served to qualify the data obtained from the questionnaire. Data from the interviews provided an in-depth and highly nuanced understanding of the perspectives and experiences of key individuals.

The data referred to in this article was gathered during the corresponding author's doctoral research (McDouall, in progress), which examined the motivations behind the implementation of English-medium instruction (EMI) and Bilingual Degree Programs (BDPs) from the perspective of university administrators. For the purposes of this article, the focus is specifically on policy formulation and implementation.

4. Findings and Discussion

4.1 Rationales

A central research question of this study is to explore the rationales driving the institution's implementation of Bilingual Degree Programs (BDPs). Analyzing open-ended responses from participants, 30 % identified the primary motivation as an effort to increase enrolments to counter a

27 % decline in the institution's student numbers between 2017 and 2023. BDPs, which offer more opportunities to study in English, were perceived as a strategy to increase the institution's attractiveness to both domestic and international students. Faculty member P88 summed up this sentiment by stating, "[BDPs are being implemented] in order to have enough students despite the declining number of students due to the lower birth rate in Germany[3]."

Similarly, 28 % of respondents stated that the introduction of BDPs served to increase the institution's competitiveness, seeing them as a unique selling point that distinguishes the institution from other universities of applied sciences (UAS) in south-west Germany. One member of the administration confirmed this view: "I think this decision is in line with the changing times and I see it as a necessity to train and possibly retain qualified staff, especially in rural areas. Also, in terms of competitiveness with other UAS or universities, I think that bilingual study programs increase the attractiveness for students and lecturers[4]."

Another 25 % of respondents indicated that the institution's decision to offer BDPs was a response to labor market demands, either due to the need for domestic graduates with language and intercultural skills in a globalized economy, or the need to equip international graduates with sufficient German language skills to succeed in the regional or national economy. Another member of the administration put it succinctly: "If you want to work in international companies or in companies that operate internationally, you have to be able to communicate bilingually in technical language. To meet this demand, universities and colleges must offer bilingual courses[5]."

A further 17 % of respondents said that the introduction of BDPs had acted as a catalyst for the internationalization of the university. These respondents suggested that BDPs offered domestic students the opportunity for an international experience without the need to travel abroad. In addition, they mentioned that BDPs would increase the attractiveness of the university to international partners due to the expanded range of courses offered in English, potentially leading to an increased number of exchange students.

Finally, a small proportion of responses indicated that the introduction of BDPs was seen as a low-hanging fruit – an easy and practical choice given the existing conditions. For example, the already international character of the university provides a suitable basis for expanding the English language provision. In addition, the inherent flexibility of BDPs makes them attractive. The implementation of such a program does not require an immediate and wholesale shift of the entire curriculum to English. Instead, it can evolve gradually, responding organically to the pace at which students enroll in more English language courses. In essence, BDPs offer a manageable and adaptable way of increasing bilingual education.

The motivations shared by the participants are largely consistent with those identified in previous research on the initiation of English-medium instruction (EMI) policies (Cole, 2006; Wächter & Maiworm, 2014). However, some motivations for implementing BDPs, which themselves represent a

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[3]   P83: „Um trotz sinkender Studentenzahlen aufgrund der geringeren Geburtenrate in Deutschland genügend Studenten zu haben."

[4]   P118: „Ich finde, dass diese Entscheidung dem Wandel Zeit gerecht wird und sehe das als Notwendigkeit um Fachpersonal, gerade im ländlichen Raum, auszubilden und evtl. zu halten. Auch im Hinblick auf die Wettbewerbsfähigkeit mit anderen HAWs oder Universitäten steigern m.E. nach bilinguale Studiengänge die Attraktivität für Studierende und Dozenten."

[5]   P88: „Wenn man in internationalen Firmen / oder in Firmen, die international tätig sind arbeiten möchte, muss man in der Fachsprache bilingual kommunizieren können. Um diesem Anspruch gerecht zu werden, müssen die Hochschulen und Unis Bilinguale Angebote liefern um der Nachfrage gerecht zu werden."

unique adaptation of EMI policies tailored to this institution's context, diverge from those commonly cited in existing literature.

Participants referred to labor market demands driven by an ageing population and suggested that German higher education institutions (HEIs) could contribute to workforce development by producing bilingual graduates through BDPs. These graduates, proficient in both German and English, would be uniquely positioned to function in a globalized work environment. The rationales provide insight into the strategic priorities and contextual realities faced by this institution and suggest an interpretation of policy in which BDPs, and by extension EMI, are seen not only as a means of increasing student numbers, but also as a response to wider socio-economic challenges.

The reasons identified by respondents, as well as the specificity of the context, underscore previous observations by Erling & Hingeldorf (2006) and Earls (2014) regarding the lack of policy guidelines for the implementation of English language policies at German higher education institutions. The documentary data support this point by providing evidence of the ad hoc development of guidelines for BDPs. For example, faculty members working on the implementation of a bilingual program in their department indicated that they were uncertain about how to offer enough English-taught courses to meet the required credit load for a bilingual degree. In an email, one member of the university administration suggested:

> I suggest that courses should be taught in a language that is specified at the beginning of the semester - either English or German. However, students should have the option of submitting assessments (assignments, presentations, and examinations) in the language of their choice. If a student chooses to submit in English, the course should be considered to have been taught in English. Similarly, if assessments are submitted in German, the course should be considered to have been taught in German.

> […] to ensure quality, it would be essential to develop clear guidelines for the linguistic assessment of submitted work. These could be developed in collaboration with the departments and the School of Languages and Cultures [...]. I have written a first draft of what these guidelines could look like and attached it[6].

The experience of this UAS highlights how institutional policies on the introduction of EMI are locally tailored to the specific needs and conditions of individual departments. This reinforces the contention that language policies are essentially created 'on the fly' as institutions make the decision to implement them.

While the absence of a one-size-fits-all policy guideline can provide flexibility, allowing higher education institutions to tailor EMI policies to their particular circumstances and strategic objectives, it results in a highly diverse policy environment. This diversity, while responding to individual institutional needs and challenges, represents an inefficient approach to language policy implementation. We conclude, therefore, each institution operating in isolation navigates the policy-

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[6]   D18: „Ich schlage vor, dass jede Lehrveranstaltung grundsätzlich in einer Sprache - entweder Deutsch oder Englisch - abgehalten wird. Die Studierenden sollten aber die Möglichkeit haben, ihre Leistungsnachweise (Hausarbeiten, Referate und auch Klausuren) in der Sprache ihrer Wahl zu erbringen. Wenn ein Studierender/eine Studierende sich dafür entscheidet, Leistungsnachweise in Englisch einzureichen, sollte der Kurs als englischsprachig gelten. Entsprechend sollte der Kurs als deutschsprachig gelten, wenn er in Deutsch eingereicht wird. Um die Qualität zu gewährleisten, wäre es jedoch unerlässlich, klare Richtlinien für die sprachliche Bewertung der eingereichten Arbeiten zu entwickeln. Diese könnten in Zusammenarbeit mit den Fachbereichen und der School of Languages and Cultures der HFU entwickelt werden. Wie diese Richtlinien aussehen könnten, habe ich in einem ersten Entwurf festgehalten und beigefügt.“

making process independently, without benefiting from the experiences of other HEI. We explore one potential issue that arises from this situation in the following section.

4.2 Challenges

While respondents were relatively consistent in their understanding of the reasons for introducing Bilingual Degree Programs (BDPs), there were marked differences between different stakeholder groups in terms of their awareness of the institution's decision to implement these programs. This disparity was particularly pronounced when respondents were asked about their awareness of the institution's internationalization strategy, which includes the implementation of BDPs. More than half (54.5 %) of administrators admitted that they were either not at all or not sufficiently informed about this strategy, with only 45.5 % of respondents claiming to be sufficiently informed. In sharp contrast, only 26.9 % of teachers said they were not informed or not informed at all, with a substantial 73.1 % saying they were adequately informed. This disparity highlights a marked difference in awareness between the two key stakeholder groups – those responsible for implementing the BDPs and those providing the necessary administrative support.
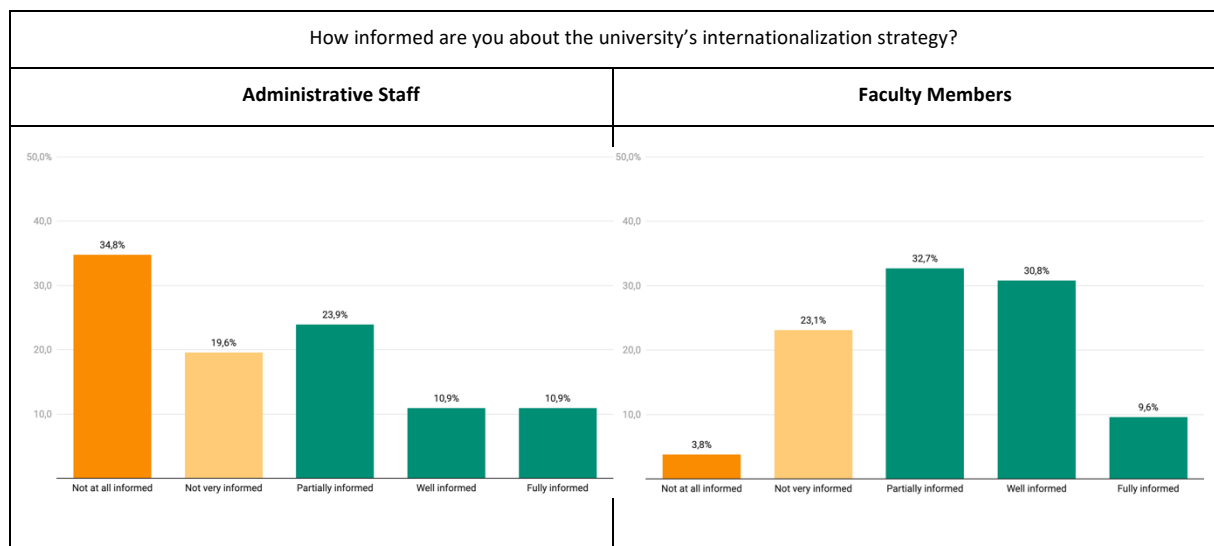

Table 1:   Stakeholder groups' awareness levels of institutional internationalization strategy

We suggest that this difference in awareness is mainly due to two factors. First, faculty members are more involved in the governance of the university, either because they take on a management role within their faculty, as dean of studies, for example, by taking on a leadership role within the central services, such as scientific manager[7] of the Examinations Office, or by being a voting member on a steering committee, such as the Quality Management Board. In contrast, while the heads of central services may be represented in steering committees, the staff within these services generally are not. Furthermore, while faculties are self-governed, administrative staff implement procedures and policies decided on by upper administration and the faculties. This limits their participation in decision-making and strategic planning. Secondly, the data indicates that there may be a serious communication gap between the university's senior management and the wider university community. Questionnaire responses repeatedly highlighted a lack of information concerning the universities strategic initiatives, such as internationalization and the implementation of BDPs.

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[7]   *Wissenschaftliche Leitung*

Our assertions are supported by themes emerging from responses to open-ended questions and interviews, which corroborate the questionnaire data. Several administrators expressed a sense of being ill-informed. For example, respondent P88, when asked about the reasons for implementing BDPs, commented: "My gut feeling, since I don't know the information: the university is trying to attract more students. Will these programs succeed, or will they be a flop? I don't know the university's strategy as to why exactly such degree programs should be promising[8]." This response underlines the information gaps among administrators and their sense of exclusion from the decision-making process. Similarly, when asked about the prerequisites for successful implementation of the BDPs in the institution, another member of the administration, P99, commented: "A lack of communication in the university among all staff can also be demotivating and lead to dissatisfaction. The whole university should be involved in the strategy in order to present itself to the outside world with comprehensive knowledge and to stand behind the strategy[9]". These comments clearly indicate a perceived disconnect in the communication chain within the university, particularly in relation to strategic decisions.

From the above discussion two dominant themes emerge: the disparity in awareness and involvement between faculty members and administrative staff, and the communication gap within the university. These issues have serious implications for the overall functioning of the institution and especially the successful implementation of strategic initiatives such as the BDP.

Regarding the discrepancy in awareness and involvement between faculty and administrative staff, the limited participation of administrative staff in decision-making and strategic planning processes may lead to lower job satisfaction and commitment. As key actors in policy implementation, administrators need to understand the reasons and motivations behind policies so they can implement these effectively. If they are uninformed or poorly informed about strategic initiatives, this could affect their ability to carry out their roles effectively, potentially leading to inefficiencies and, ultimately, negative outcomes for these programs. Furthermore, if administrative staff feel excluded from the decision-making process, they may also feel undervalued, which could affect their commitment and productivity.

Related to the above point, a lack of effective internal communication has far-reaching consequences. It can result in a lack of clarity and understanding of the strategic direction of the university, leading to confusion and inconsistency in policy implementation. Furthermore, if staff feel out of the loop, it can lead to dissatisfaction and low morale, as evidenced by the quotes from administrators. A poor internal communication strategy is also a missed opportunity for feedback and input from different stakeholders, which is crucial for continuous improvement and innovation.

Therefore, it is important for universities to establish clear and effective channels of communication and to involve all stakeholders in strategic planning and decision-making processes. This ensures that everyone is on the same page, increases staff engagement and satisfaction, and in the end leads to more effective policy implementation and better outcomes for strategic initiatives such as implementing EMI and BDPs.

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[8]   P88: „Gefühlsmäßiges Urteil, da Informationen nicht bekannt: die Hochschule versucht mehr Studierende zu gewinnen, ob dies mit diesen Studiengängen gelingt, oder ob es ein Flop wird? Die Strategie der Hochschule, warum genau solche Studiengänge erfolgsversprechend sein sollen, ist mir nicht bekannt."

[9]   P99: „Mangelnde Kommunikation an der Hochschule unter allen Mitarbeitenden kann auch unmotivierend sein und führt zu Unmut. An einer Strategie sollte die ganze Hochschule teilhaben um mit umfassendem Wissen auch nach außen auftreten können und hinter der Strategie stehen können."

5. Recommendations

5.1 Establishing Policy Guidelines

Our research into language policy formulation in a German university of applied sciences (UAS) suggests that policy guidelines, whether from official sources or through publications, would serve to provide standards for policy planning and proposals. Guidelines would support individual institutions in their policy formulation and implementation processes, particularly as the formulation of explicit and codified language policies appears to be a relatively recent endeavor for many higher education institutions (HEIs) in Germany. To develop these guidelines, we recommend further research into the motivations, methods and key actors involved in language policy formulation and implementation in different institutions. Potential challenges identified within these guidelines can prompt proactive strategies to circumvent these issues and improve the overall efficiency of the process.

5.2 Inclusive Policy Formulation

At the institution we studied, we identified two major issues that could potentially undermine the effectiveness of policy formulation and implementation: a lack of inclusivity and inadequate communication. Administrative staff were largely excluded from the policy-making process, resulting in a knowledge gap regarding the institution's internationalization strategy and related language policies. Furthermore, the communication of these strategies and policies to the wider university community was sub-optimal and contributed to feelings of disenfranchisement.

In line with Spolsky (2004), we advocate for an inclusive approach to policy formulation that involves all stakeholders. This inclusivity aligns institutional language policies with the language ideologies and practices of the community, and equally important, it ensures the widespread understanding of the policy rationale. Furthermore, it provides opportunities for stakeholders to express their concerns, fosters a sense of value and respect and, consequently, secures the long-term commitment of everyone charged with implementing a particular policy. We believe that such an inclusive approach would enhance the efficiency and effectiveness of language policy formulation and implementation, thereby facilitating the successful introduction of English-medium instruction (EMI), or, as in our case, Bilingual Degree Programs.

Finally, we suggest that institutions develop plans to communicate their strategies and language policies to the wider community. Such a communication plan should use different channels, such as newsletters, official emails, or senior management briefings, to ensure that information reaches all stakeholders. Given the potential anxiety associated with language policies among those who are less confident in their language skills, we also recommend offering supportive training opportunities. For example, our institution held an EMI workshop for faculty and staff to introduce the concept and discuss the potential impact on individuals and the institution as a whole. It was our experience that proactive communication and support measures were appreciated and contributed to a growing acceptance of the institution's language policies.

6. Conclusion

By shedding light on the policy-making process at one particular institution, our study aims to raise awareness of processes that have remained largely opaque and informally managed within German higher education institutions. By scrutinizing the mechanisms of policy formation, we highlighted potential challenges that can arise at the policy formulation stage. We identified two issues: the

perceived exclusion of certain members of the university community from the policy-making process and poor communication of the policy from the upper administration into the university community.

We recognize, of course, that policies should be contextual and allow universities the flexibility to respond to their particular circumstances, however, we argue that there is value in the development and implementation of language policy guidelines. These set standards and identify best practices in language policymaking, thereby promoting more effective policy implementation. Indeed, policy guidelines should be seen as a resource, enabling institutions to avoid the need to discover and negotiate the pitfalls of language policy implementation through a trial-and-error approach.

While our research provides valuable insights into the language policy formation process and potential hurdles to their implementation, it's essential to note the limitations of this exploratory investigation. Firstly, the study focuses on a single university of applied sciences (UAS), which restricts the broader applicability of our findings. Moreover, policy formation is a dynamic and iterative process, continuously adapting to internal and external influences. This means that the study is contextually and temporally bound, reflecting the efforts of one institution adapting to its unique set of challenges. To mitigate these limitations, we recommend further studies involving higher education institutions in varying contexts. Such research could help identify common themes that transcend the confines of individual institutions, enriching the proposed guidelines and enhancing the understanding of language policy formation in a range of settings.

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